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<td>Land to the north of the A146, Beccles Road, Lowestoft</td>
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<td>114</td>
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<td>115</td>
<td>Land to the west of Halesworth (Block 1)</td>
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Introduction

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Introduction

Comment ID 1117

Comment The Waveney Core Strategy (adopted January 2009) was prepared prior to the publication of the National Planning Policy Framework (NPPF) and covers the plan period to 2021. Support is given to Waveney District Council for seeking to prepare an up-to-date Local Plan in accordance with the core principles for planning as stated at Paragraph 17 of the NPPF.

Attached documents
Gooch

Section  Introduction

Comment ID  108

Comment  I would like to congratulate everyone involved in the research and preparation of the new Waveney Local Plan. This appears to be a well informed document which should have a significant and positive impact on the development of the area and it's occupants in the near future.
J Clutten

Section: Introduction

Comment ID: 905

Comment: My main objection to the plan is the use of agricultural land for additional development, currently there are many brownfield sites in the area, while this remains the case, building on farmland is unjustified and unacceptable on environmental grounds. It should be made clear to developers that Waveney will only allow housebuilding/industrial development on greenfield sites once brownfield areas are used. The last thing the residents of Waveney want to see is large greenfield developments completed, while the 'blots on the landscape' remain. We all know where they are (Zephyr Cams, Jeld Wen, Sanyo and sites in Oulton Broad). Why would a developer even consider building on a brownfield site when a local council is offering flat, greenfield sites on land currently owned by them.

At this point, I would like to remind the Council of the saying, supposedly of Native American Origin, which says

"We do not inherit the land from our ancestors; we borrow it from our children". Once development on greenfield sites takes place, they will never return to agricultural use. With the British public wanting home grown food and the consideration being given to reducing food miles it should be the Council's aim to avoid building on agricultural land, not actively encouraging it.

Extracts from National Planning Policy Framework 2012 say

"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; Page 4

encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; page 5"

The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans.

June 7, 2016 [http://www.brandonlewis.co/national-issue/green-belt-development/]

Brandon Lewis [http://www.brandonlewis.co/author/brandon/] Green belt development

"Many people contact me about development on the Green Belt, particularly when it on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development. National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development."

"Latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989.

I further welcome plans to ensure that planning permission is in place on 90 per cent of suitable brownfield sites by 2020. This will ensure that development is prioritised on brownfield sites rather than at the expense of our countryside"

http://www.brandonlewis.co/national-issue/green-belt-development/

The documents mention predictions of increase in jobs in the area, these seem to be very optimistic, especially as there appears to be some question over Cefas remaining in Lowestoft. To attract companies there needs to be good transport links, Lowestoft is essentially at the end of the line. While the Power Park might attract energy related companies, others may well decide the extra few miles along the A47/A12 is not attractive, more roundabouts and speed restrictions on the final few miles of the A47 will not help. Even one of the most recently constructed junctions is already proving inadequate (Somerleyton Road/ Millenium Way), this is on what will be one of the main routes to the new bridge.

Attached documents
Paul Cope

Section  Introduction

Comment ID  789

Comment  The problem with this plan is that the larger strategic thinking isn’t there. Infrastructure is being left to the vagaries of the market and the possible donations of developers. The impact on hospitals and larger institutions are not considered. The impact of increased motor traffic across the whole of Waveney is not considered to any great extent. The plan is not an integrated one at all but a series of peicemeal proposals which may, or may not, join up. Where everyone will work who live in all of these houses you propose is a pretty moot point. What industry will they work in? If you are hoping that they will work in tourism then this is really where the plan gets in its own way. By building all of these houses and developments and bringing in all of the cars and lorries that go with that and changing views and expanding towns you will change the character of the area completely and this will impact on tourism in the area. Why come on holiday to somewhere quiet and peaceful when it isn't quiet and peaceful anymore, in fact, when it’s a lot like everywhere else? People won't bother and you will have killed the goose that lays the golden egg. It won't be an over night thing but this plan will change the character of the area irrevocably.

Attached documents
R G Meadows & Son - Savills (UK) Ltd (Jonathan Dixon)

Section Introduction

Comment ID 1435

Comment The Waveney Core Strategy (adopted January 2009) was prepared prior to the publication of the National Planning Policy Framework (NPPF) and covers the plan period to 2021.

Support is given to Waveney District Council for seeking to prepare an up-to-date Local Plan in accordance with the core principles for planning as outlined in the NPPF.

Attached documents
What is the Local Plan?

Sally Anfilogoff

Proposed Merger of Local Authorities

Firstly, I am surprised that the draft Local Plan makes no reference to the proposed merger of WDC with Suffolk Coastal District Council (SCDC) which is expected to complete in 2019, i.e., one year after the WDC Local Plan is expected to be adopted.

I am aware that SCDC is currently consulting on its own revised local plan. It is a bizarre situation where two adjoining local authorities are in the process of merging but nonetheless each is preparing its own long-term local plan (to 2036) in the knowledge that each authority is expected to cease to exist in two years’ time.

It is difficult to see how residents of WDC can be expected to take the consultation process seriously when WDC itself fails to do so.

At the very least I would have expected the draft Plan or a supporting document to set out how the Plan might change following the merger. For example, is it expected that the two plans will be merged (with inevitable amendment where they do not dovetail)? Is it expected that one of the two plans will largely supersede the other?

I suggest that it would be sensible for preparation of the Plan to be paused so that a combined plan can be prepared with SCDC for the new combined authority. Any other approach will surely lead to confusion and a considerable waste of resources.

All of my remaining comments should be read in the light of this fundamental caveat.
Attached documents
South Norfolk District Council Adam Nicholls

Section What is the Local Plan?

Comment ID 1580

Comment Overall South Norfolk Council is very supportive of the Waveney Local Plan. In general, it is a very well laid out and well-presented document, with good use of visuals. In our view this makes the plan easy to understand and more accessible to a wide audience.

It is noted that there are several pieces of work to be finalised before the plan is submitted for examination including viability assessment of proposals and policies, infrastructure delivery and impact on internationally protected species. It will be of particular importance that these are concluded before the final Plan is submitted for examination.

Attached documents
Consultation

Anonymous

Section Consultation

Comment ID 371

Comment I see very little point in consulting and writing policies regarding planning when at the drop of a hat they can be ignored when Councillors choose.

I know there is a plan at present but too many of the current planning policies are so readily ignored despite a large number of community objections.

Attached documents
<table>
<thead>
<tr>
<th>Section</th>
<th>Consultation</th>
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<tbody>
<tr>
<td><strong>Comment ID</strong></td>
<td>310</td>
</tr>
<tr>
<td><strong>Comment</strong></td>
<td>It is good to have these show &amp; tell session but the time frame allocated is very brief ie 2 hrs in Bungay does not allow for many working people to attend. I would suggest in St Mary’s church on a Saturday morning – plus better advertising of the event.</td>
</tr>
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**Attached documents**
**Anonymous**

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<th>Section</th>
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<tr>
<td>Comment ID</td>
<td>287</td>
</tr>
<tr>
<td>Comment</td>
<td>Meeting notes. The representatives were ill-informed. The displays were enlarged maps from the paper. The map of Ringsfield was missing. Not impressed.</td>
</tr>
<tr>
<td>Attached documents</td>
<td></td>
</tr>
</tbody>
</table>
Bramfield and Thorington Parish Council Anne Thomas

Section | Consultation

Comment ID | 301

Comment | A useful and helpful display of info, staff also very helpful.

As chair / vice chair of 2 Parish Councils in SCDC area (Bramfield and Thorington / Cookley and Walpole), I'd be pleased if more information could be made available to the Parishes surrounding / south of Halesworth. Perhaps a mobile display in village halls?

Attached documents
Gaius Hawes

Section Consultation

Comment ID 29

Comment My Twitter account was alive today with the first so called draft of planning development to the East of the A12 towards Corton. If I were to exspress my concern it would I feel fall on deaf ears. So as an intial comment i wonder why bad news is released when local people are on holiday and are unable to attend meeting arranged bat short notice through August. Odd that?

Attached documents
Irene Thomas

Section Consultation

Comment ID 624

Comment The timing of the meeting – when people are on holiday with a narrow timeband when people are coming home from work or getting children to bed isn’t a good idea.

Why only 1 poster for Halesworth and everyone is crowding round trying to read? Each area will have more interest in their town than others. Plans on table have no context – difficult to understand.

Attached documents
<table>
<thead>
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<th>Judith Condon</th>
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<td><strong>Comment ID</strong></td>
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<td><strong>Comment</strong></td>
</tr>
<tr>
<td><strong>Attached documents</strong></td>
</tr>
<tr>
<td>Mr &amp; Mrs Gil Sawyer</td>
</tr>
<tr>
<td>---------------------</td>
</tr>
<tr>
<td>Section</td>
</tr>
<tr>
<td>Comment ID</td>
</tr>
</tbody>
</table>
| Comment | Your plan in the exhibition states the road north of the bascule bridge as the A12. It is now the A47.  
Your Section says "Location – Peto Square" Is this correct? |
| Attached documents | |
| **P L Hyden** |
|---|---|
| **Section** | Consultation |
| **Comment ID** | 623 |
| **Comment** | Incidentally we thought exhibition was poorly set out and difficult to understand. |
| **Attached documents** |
Rachel Shaw

Section Consultation

Comment ID 38

Comment Why isn't there a meeting on the purposed development at cotton, bundleton or hopton when these are the areas which would be most affected by it

Attached documents
## Rosemary and Alan Corcoran

<table>
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<tr>
<th>Section</th>
<th>Consultation</th>
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| Comment ID | 922 |

### Comment

These bullet points highlight our concerns about the development proposed [see WLP7.19] but we have other concerns about the undemocratic and biased process and the way that Waveney have conducted the consultation process.

The inclusion of the site was brought to our attention and all residents of Woodfield Close by the good services of the local parish councillor. We do not receive "The Advertiser" where we were told the information had been posted and to our knowledge no one in the close was aware that the site had been included as acceptable for development.

Surely this against the principles of natural justice and opens the whole process to legal challenge.

Equally concerning is the "call for sites" initiative, which we have been advised by planning officers, was restricted to land owners and developers. How outrageous is that? Unsurprisingly developers and land owners were falling over themselves to recommend their, vested interest, sites as appropriate for inclusion.

We attended a Parish Council meeting in March where a working party was formed to determine what local residents would like included in the Local Plan. Waveney posted the notices on the sites "approved for inclusion" before that group had produced any suggestions, hardly a democratic and fair process.

### Attached documents
Rosemary Hewlett

Section       Consultation

Comment ID   744

Comment       I feel I must also say that the public consultation that took place on 8th August was woefully inadequate. Not enough literature for the number of people looking and only two people to talk to which I couldn’t get anywhere near. Why did you have literature on the other areas? This took up more room than was necessary and would have been far better to have just had what related to Beccles and Worthingham as it was aimed at Beccles/Worthingham inhabitants. The timing wasn’t brilliant for those at work and I see in the Local Plan Key Issues you do state that most people work out of town.

"At present most working people in Beccles and Worthingham do not work in the town (or in the Ellough employment area). A third of people commute to other local authority areas including South Norfolk, Norwich and Great Yarmouth. 10% travel to Lowestoft. Traffic congestion is an issue for some parts of the town, such as around Ingate, and in this location there is a risk it could contribute to air quality problems."

The second meeting held on 29th August at the Blyburgate Hall, although a bit later, was poorly advertised and the first 55 minutes were taken up with two WDC representatives talking about things we already knew. Someone interrupted and asked that questions be put to the floor as it was meant to be a public meeting. Our questions were not really answered. It was simply a case of telling us what we had to have.

Most of the questions related to infrastructure which is my main concern. We do not have enough police to cope with the issues we have at the moment. We cannot cope with another 1,500 homes. Crime is on the increase here.
Susan Doherty

Section Consultation

Comment ID 798

Comment I would mention the so called public consultation on this very important issue and something which will effect the people of Beccles for years to come, which was held at the Public Hall in the town on 8th August 2017. The afforded time of two hours, 5.30pm to 7.30pm, is a time when people are arriving home from work, getting meals etc. This should have been an all day spread, not a miserly two hours which did bring many complaints.

The second meeting held on 29th August 2017 at Blyburgate Hall Beccles, was supposed to be a question and answer session with two representatives from WDC. It was not advertised clearly and a member of the public had to alert the press, hence a great many inhabitants missed out. The time again was only two hours with one hour of this taken up by a talk from council planners about how lucky we are that these new houses are going to be built, also claiming that these will bring more council tax payers which will equate to more money being available for more police. I understand from the Police and Crime Commissioner Mr Tim Passmore that this is completely untrue. I suggest therefore that W.D.C. is misleading the public with this false statement and is deceiving the electorate.

Attached documents
Tony Neale

Section          Consultation

Comment ID      286

Comment          No details/plan available at exhibition for the proposed Ringsfield
development [waste of time attending]

Attached documents
How to use this consultation document

Norman Castleton

Section

Comment ID

Comment

How to use this consultation document: Context & strategy for growth

1. Overall strategy for growth. The growth is not defined. What is the growth, whatever it is, supposed to achieve? More emphasis on the environmental implications although mentioned as a sustainability issue it amounts to more than this. What will be the environmental implications of this growth? Will human habitation be sustainable in the longer term given the detrimental effect of economic, physical and pollution growth.

2. Strategy for growth Lowestoft. "A big part of the plan is providing a regeneration strategy for Central & coastal Lowestoft to continue the success of the Lake Lothing & Outer Harbour action plan". Since nothing has actually happened this so called action plan can hardly be called a success.

Attached documents
Duty to Cooperate

Broads Authority Natalie Beal

<table>
<thead>
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<th>Duty to Cooperate</th>
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</thead>
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<tr>
<td>Comment ID</td>
<td>457</td>
</tr>
<tr>
<td>Comment</td>
<td>Broads OAN is 57 from 2015 to 2036 according to the 2017 CNSHMA.</td>
</tr>
</tbody>
</table>

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section Duty to Cooperate

Comment ID 1164

Comment The Borough Council recognises the hard work that has gone into preparing the document, which acknowledges the cooperation with partners including the Borough Council. There are many areas of mutual interest, such as growth within the offshore energy industry, coastal change, and protecting and enhancing our rich natural environments (such as the recently completed Landscape Sensitivity Study across our areas). The Borough Council looks forward to further cooperation in future, and on the evidence of the Draft Plan is satisfied that Waveney District Council has met the 'Duty to Cooperate' on strategic planning matters in so far as Great Yarmouth Borough Council is concerned.

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section  
Duty to Cooperate

Comment ID  
1165

Comment  
Update on Great Yarmouth Borough plans progress

The Borough Council is nearing completion of its Draft Local Plan Part 2: Detailed Policies and Site Allocations and anticipates consulting on this in the coming few months. Note also that Hopton-on-Sea Parish Council is in the early stages of preparing a Neighbourhood Plan for the parish (the Neighbourhood Area was designated on 7 March 2017).

Attached documents
Home Builders Federation Mark Behrendt

Section Duty to Cooperate

Comment ID 898

Comment Thank you for consulting the Home Builders Federation (HBF) on the Waveney Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan.

Duty to Co-operate

The Council consider Waveney to be its own Housing Market Area (HMA) due to the relatively high self-containment in terms of both migration and commuting. Whilst there are clearly links to both the Norwich HMA and Ipswich HMA the Borough does have a high degree of self-containment in relation its housing market. However, would like to stress that this should not absolve the Council from co-operating with its neighbours should there be unmet housing needs in either of the adjoining HMAs. There are clear links and overlap between the HMAs and that delivery within Waveney could meet the needs of other authorities. The Council will need to work closely with its neighbouring authorities to ensure that these housing needs are addressed in full. If there are unmet needs in these Borough's the Council should make a commitment to review its Local Plan and consider whether further sustainable allocations could be made to support neighbouring HMAs.

Attached documents
South Norfolk District Council Adam Nicholls

Section | Duty to Cooperate

Comment ID | 1581

Comment | The Plan includes a section on Duty to Cooperate and states that Waveney has engaged constructively with its partners, including South Norfolk Council, in the preparation of the new Local Plan. As a neighbouring local authority, South Norfolk Council is keen to continue working with Waveney through the Duty to Cooperate on cross boundary strategic matters and in particular any issues that might affect the Waveney Valley. The regular "Norfolk-Suffolk" meetings that the border councils have is proving very useful in this regard.

This South Norfolk Council response does not provide comments on all sections/policies in the plan, only those where it is felt there is a direct potential impact on South Norfolk or where particular issues/comments have been noted.

Attached documents
Watts

Section  
Duty to Cooperate

Comment ID  
196

Comment  
Does Waveney District Council also have a strategic relationship with the Suffolk Coast and Heaths Area Of Outstanding Natural Beauty (AONB) organisation, and if not, why not?

Attached documents
## Waveney Context

**Broads Authority Natalie Beal**

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**Comment**

Page 7, para 2 – the River is navigable to near to Bungay which might be of relevance to this access paragraph.
Society Key Issues

James Servaes

Section Society Key Issues

Comment ID 33

Comment Poor diet adds to health problems not "Issues". Much of it is caused by eating fast food and comfort food, which is expensive per calory, thus adding to the perceived deprivation.

Attached documents
Norman Castleton

Section  
Society Key Issues

Comment ID  382

Comment  
District wide issues

House prices in Lowestoft are lowest in the area because the town is not seen as being a particularly attractive place to live. There is a lack of aspiration both at Council level and amongst a large proportion of the population. Education availability and attainments needs improving and so do all the other factors indicated above except the stated good sense of community which I would question. The policy of austerity has acerbated all these factors and at the moment we seem to be heading for a social housing and Motability scooter led flight to the bottom of the economic and social ladder.
Norman Castleton

Section  
Society Key Issues

Comment ID  
112

Comment  
Society key issues, health.

No more burger bars and junk food take-away establishments or drive through coffee bars.

Attached documents
**Norman Castleton**

<table>
<thead>
<tr>
<th>Section</th>
<th>Society Key Issues</th>
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**Comment**

Society key issues:

Overall this is a sorry picture. Perhaps rather than emphasizing growth and thereby increasing the demands on services we should be improving the quality of what already exists. The run down in health services both treatment and advisory is a disgrace and in a similar vein the educational effort in the area also requires improvement.
Southwold Town Council Lesley Beevor

Section Society Key Issues

Comment ID 1562

Comment The draft Plan, correctly identifies high house prices throughout Waveney and the impact of this on affordability, given the mismatch between wages and house prices.

A significant driver of high house prices, that is not mentioned in the Plan, is Waveney's attractiveness as a second home destination because of the beauty of the area and the charm of its rural communities. This omission should be rectified since the phenomenon is not simply a Southwold problem.
Watts

Section  Society Key Issues

Comment ID 197

Comment How is the increase of 13,000 extra residents calculated (surely it can only be a 'best guess'). After Brexit the amount of net migration into the U.K. (and presumably into the District) should decrease and maybe even reverse. Has any allowance been made for this?

Why is it assumed that households will decrease in size? With the large increase in house prices, more children are staying at home longer with their parents. This trend should mean that households increase in size.

Attached documents
Environment Key Issues

Broads Authority Natalie Beal

Section Environment Key Issues

Comment ID 459

Comment The Broads is also equivalent to a National Park. This could be mentioned in this infographic.

Attached documents
James Servaes

Section Environment Key Issues

Comment ID 34

Comment To say that water quality in rivers is decreasing and is mainly due to run off from arable land is inaccurate and a dangerously broad generalisation. The results from work done by Catchment Sensitive groups on the River Waveney show that water quality has improved considerably as a result of mitigating actions taken by farmers.
Peter Eyres

Section          Environment Key Issues

Comment ID      818

Comment          Grade 1 and 2 agricultural land and preferably also the best Grade 3 land must be identified on the policies map so that it can be protected, especially as most of it is near the towns. If it is not on a map, it is out of sight, out of mind: the populace cannot defend what they do not know about and planning officers can easily forget about it. We need to protect our best agricultural land at this time of Brexit and associated uncertainties, growing population and changing climate.

Attached documents
The River Waveney Trust was formed in order to enhance and protect the River Waveney corridor, tributaries and catchment, its ecology, water quality and environment; it also has an educational role and promotes public access to the river.

The Trust welcomes the draft Waveney Local Plan's recognition of decreasing water quality as one of four key environmental issues. It is also glad to see that the problems of agricultural run-off, the District's location in a water-stressed region and the sensitivity of rural river valleys and tributary farmland to change, are acknowledged. However, The Trust is disappointed that this recognition of water and river-related issues is not always reflected in policies. We recognize that the Broads Authority is the planning authority for the river itself within the District, but development in the catchment beyond the Broads Authority area has a direct bearing on the river's health.

Overall, we think the draft Plan should take a more positive attitude to enhancing water and drainage issues, and to promoting biodiversity. Consideration should be given to including policies 'SWM4 – Water Quality Improvements' and 'ECO1 – Biodiversity Enhancement' suggested in AECOM’s Water Cycle Study, into the Local Plan. (Relevant Water Cycle Study policies are referenced at the end of the email.)

WATER CYCLE STUDY

Recommended policies referred to in the text:

SWM2 – SuDs and Green Infrastructure

Where possible, developers should ensure linkage of SuDS to green infrastructure to provide environmental enhancement and amenity, social and recreational value. SuDS design should maximise opportunities to create amenity, enhance biodiversity, and contribute to a network of green
(and blue) open space.

SWM3 – SuDs and Water Efficiency

Developers should ensure linkage of SuDS to water efficiency measures where possible, including rainwater harvesting.

SWM4 – Water Quality Improvements

Developers should ensure, where possible, that discharges of surface water are designed to deliver water quality improvements in the receiving watercourse or aquifer where possible to help meet the objectives of the WFD.

ECO1 – Biodiversity Enhancement

It is recommended that Waveney District Council include a policy within its Local Plan which commits to seeking and securing (through planning permissions etc.) enhancements to aquatic biodiversity in the District through the use of SuDS (subject to appropriate project -level studies to confirm feasibility including environmental risk and discussion with relevant authorities).

Attached documents
Watts

Section   Environment Key Issues

Comment ID  200

Comment

There are a lot of positive and accurate statements in this section of the plan, which is great. The real strengths of Suffolk (which I believe is one of the best counties in the U.K.), are

The beautiful coast and countryside

The fantastic, world famous wildlife

Its historic buildings (especially churches) and monuments

The friendliness of the residents.

However, I have one concern - why is the Broads singled out as a special case, when surely there are many, many areas within the District which are just as important from an environmental and wildlife conservation point of view? I would like to see every conservation area and biodiversity site, as well as sites of natural beauty, fully protected from any damaging developments (in fact why even consider then for development?).

Attached documents
Economy Key Issues

Dick Houghton

Section Economy Key Issues

Comment ID 1096

Comment Offshore renewables don't stop at wind. Tidal power generators are close to becoming commercially viable (see Orkney) and the Norfolk coast is a prime site for them. We should be looking to attract these companies to our unique Inner Harbour for their assembly facilities. Now is that moment. Leave it too long and the work will all go to The Humber.

Attached documents
**Norman Castleton**

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<td>Comment</td>
<td>Economy key issues</td>
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The issue regarding the decline in job opportunities has to be addressed if the area is to remain viable. There is no future in continuing with the overdevelopment of the service sector and its Burger bars and takeaways. The biggest growth at the moment seems to be in social housing and mobility scooters! In this respect areas such as the south key of Lowestoft will be so important in the development of meaningful economic activities. The building of the third crossing will be an opportunity which should not be wasted to develop an adjacent business park. Regarding the offshore opportunity there has been a lot of talk but very little in Lowestoft although thank goodness for SLP. Gt. Yarmouth seems to be making greater strides in the area of economic activity.

**Attached documents**
Peter Mackay

Section | Economy Key Issues

Comment ID | 87

Comment | The statement "Lowestoft has higher vacancy rates (although these are on the edge of the town centre)" is not very informative.

Does this refer to hotels, retail units, commercial units, jobs..... etc.?

Attached documents
Watts

Section Economy Key Issues

Comment ID 203

Comment Four things which I think could help the local economy ;-)

Reduce or even reverse the massive and ridiculous increase in small business rates. Surely it would be more logical and fair to link business rates to the annual turnover of a business and not the property value? This would really help start-up businesses as well.

Improve broadband speeds across the whole District, particularly rural areas.

Improve access and parking in the main Lowestoft shopping precinct. Also redevelop the whole of the shopping precinct into a true 'shopping mall'. At the moment the shopping experience is dire - we would much prefer to travel three times the distance into Norwich instead of using the Lowestoft high street.

Offer all-day free parking at car parks close to the main retail centres.
Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Bourne Leisure Ltd (Lichfields) - Lichfields (Sian Davies)

Section
Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID
1485

Comment
Bourne Leisure notes that the 'Settlement Specific Key Issues – Key issues in Lowestoft, Carlton Coleville, Oulton and Oulton Broad' (page 14) states 'the Council is working with partners to ensure the delivery of strategic flood protection measures to mitigate these risks. It is anticipated that these measures will be complete by 2021'. The Company supports the Council's commitment to protecting key assets of the District; it is also considered that the Council should seek to ensure that smaller settlements such as Corton and other seaside locations are also protected. This suggested revised approach would align with national policy (NPPF para 105), which states that local planning authorities to apply "Integrated Coastal Zone Management' across the local authority (para 105).

Attached documents
Broads Authority Natalie Beal

Section
Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID
460

Comment
The Broads is not a National Park for planning purposes. It has a status equivalent to a National Park.

Attached documents
Colin Butler

Section  Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID  1104

Comment  Before building new developments on green field sites, there are vast swathes of sub-standard housing in central Lowestoft that should be replaced. It is appreciated that slum clearance became a dirty phrase in the 1960's, but a programme of phased replacement would do much to improve the housing stock in the town.

In particular, the Lowestoft Journal today (22-09-2017) headlines a proposal for a Heritage Action Zone around the High Street. Why? Just run a bulldozer through the whole lot and build modern dwellings suitable for 21st century living.

Attached documents
Environment Agency

Section

Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID

856

Comment

We welcome the recognition of the importance of protected landscapes and habitats around Lowestoft and the risk posed to these through development. We also welcome that the section identifies flooding as a major issue for parts of Lowestoft, this is commented upon later in our response.

Attached documents
Historic England

Section Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID 1362

Comment We welcome the identification by settlement grouping of the key issues affecting each area. However, the identification and use of the historic environment and its issues in these sections could be improved. In particular, recognition of the historic Scores in Lowestoft and the issues facing the historic High Street would be relevant for your spatial consideration, as would reference to its assessment under the conservation areas at risk methodology (the outcome of which will be published later this year by Historic England).

Attached documents
Kevin Sullivan

Section

Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID

610

Comment

I have noticed that planning permission for dwellings is in place but appear to only proceed with ground clearance work the land then used for other purpose ie storage units car repairers sorned vehicle parking fly tipping non emptied council bins etc. the west end of Lake Lothing is quite frankly a mess. this area should be developed before allocating New housing sites on green areas.The third crossing and flood barrier should be completed first and foremost before more housing puts increased pressure on the current infrastructure . It's not good to just demolish and clear areas only to be left to return to the wild, take a look at the once caravan/mobile site on saltwater way, ground work done, now an overgrown wild area no housing developed .It will become a fly-tip area as is happening in South Elmham Terrace area.It's no good setting out plans that are not carried through by investors what looks good on local plans is not the real deal..

Attached documents
Lowestoft Town Council Shona Bendix

Section

Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID

1312

Comment

Settlement Specific Key Issues – pages 14-15- a There is no mention of medical assets/resources e.g. need for more medical centres, better blood testing arrangements e.g. Beccles and James Paget hospitals offer drop in tests but Lowestoft has appointment only system for north of the town and only some drop in appointments in the south of the town.

The LTC believes the provision of blood tests and other therapy are inadequate for the northern areas of the town and that there should be provision for future development for a comprehensive surgery in the north end of town much like the Kirkley Mill complex in the south end of town.

The LTC supports a full 24/7 minor emergency clinic in Lowestoft.

Attached documents
Norman Castleton

Section  
Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID  
114

Comment  
Settlement specific key issues:

The so called historic assets of Lowestoft have not been well cared for over the years. Historic buildings have been pulled down in 1960s style and re-siting the Council offices on the South quay away from the town centre was a big mistake. Developments on the perimeter such as the Zephyr Cams site and the North Quay will not help the town centre. The historic high street is a in a sorry state and the scores especially the Mariner’s & the Crown scores require immediate remedial attention. The much talked about third crossing may have a beneficial effect but adversely unless the Lowestoft town centre is improved it could mean that all casual traffic will simply bypass the town. This will require careful managing. The East Coast park development will be a waste and the resources should be used to develop the town centre.
R G Meadows & Son - Savills (UK) Ltd (Jonathan Dixon)

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<tr>
<td>Comment ID</td>
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| Comment | On page 15 of the Local Plan, it is noted that: "Carlton Colville Primary School has a large catchment area and is located some distance from the main built up area of Carlton Colville. As such many parents drive their children to school which creates local congestion and road safety issues."

It is considered that the allocation of site WLP2.15 (Land South of The Street, Carlton Colville/Gisleham) can help address this issue.

Attached documents
Suffolk County Council Robert Feakes

Section  
Key issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Comment ID  1617

Comment  
General reference is given to the historic nature of places, but the County Council suggests that additional short references to highlight further historic distinctiveness could enhance the text and help ensure that the Plan meets the NPPF requirement to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. This context helps identify the relevant historic characteristics to be conserved, enhanced and enjoyed.

• Page 14 – For Lowestoft, the characteristic Scores could be mentioned, and early origins/fishing heritage/historic port.

The County Council would be pleased to advise on additional text, if the District Council is minded to make such an amendment.

Attached documents
Key issues in Beccles and Worlingham

Historic England

Section | Key issues in Beccles and Worlingham

Comment ID | 1363

Comment | We welcome the identification by settlement grouping of the key issues affecting each area. However, the identification and use of the historic environment and its issues in these sections could be improved. We also would expect more detail on the historic environment in Beccles and Worlingham and Southwold and Reydon.

Attached documents
South Norfolk District Council Adam Nicholls

Section Key issues in Beccles and Worlingham

Comment ID 1582

Comment • Could the second paragraph mention the cross-boundary influence of the town and the fact that Beccles acts as a service centre for a number of rural settlements in South Norfolk? Suggest amending the second sentence to read:

'The town provides a good range of services to meet everyday needs and acts as a service centre for the surrounding rural community, both in Waveney and across the district boundary into South Norfolk'.

• It is interesting to note the level of out-commuting to other districts, including South Norfolk.

Attached documents
Suffolk County Council Robert Feakes

Section: Key issues in Beccles and Worlingham

Comment ID: 1618

Comment: General reference is given to the historic nature of places, but the County Council suggests that additional short references to highlight further historic distinctiveness could enhance the text and help ensure that the Plan meets the NPPF requirement to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. This context helps identify the relevant historic characteristics to be conserved, enhanced and enjoyed.

- Page 16 – Beccles – historic river port, hints of Anglo-Scandinavian settlement in -gate place names.

The County Council would be pleased to advise on additional text, if the District Council is minded to make such an amendment.

Attached documents
Key issues in Bungay

Dick Houghton

Section  | Key issues in Bungay
Comment ID | 1097

Comment  | Lowestoft and Waveney do not emphasise the proximity of the Broads sufficiently in my opinion. We have wonderful access to this well-loved area. We could provide better facilities and better tourist information for it.

Attached documents
South Norfolk District Council Adam Nicholls

Section: Key issues in Bungay

Comment ID: 1583

Comment:
• Support the mention of cross boundary links and the recognition that Bungay acts as a local service and employment centre for the villages of Earsham and Ditchingham in South Norfolk.

• Again, it is interesting to note the level of cross boundary out-commuting to other districts including South Norfolk.
Suffolk County Council Robert Feakes

Section  
Key issues in Bungay

Comment ID  
1619

Comment  
General reference is given to the historic nature of places, but the County Council suggests that additional short references to highlight further historic distinctiveness could enhance the text and help ensure that the Plan meets the NPPF requirement to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. This context helps identify the relevant historic characteristics to be conserved, enhanced and enjoyed.

• Page 17 – Bungay – defined by river and marsh, Saxon/Medieval church and priory

The County Council would be pleased to advise on additional text, if the District Council is minded to make such an amendment.

Attached documents
Key issues in Halesworth and Holton

Andrew Stewart

Section

Key issues in Halesworth and Holton

Comment ID

839

Comment

A secondary school is important if the town is to grow and attract younger families. I have heard of proposals for a new supermarket but the existing provision seems adequate and the high street will suffer from further erosion of trade. There is not much distinction between Holton and Halesworth any more so seeking to somehow preserve some sort of separation seems rather pointless.

Attached documents
Historic England

Section          Key issues in Halesworth and Holton

Comment ID      1367

Comment          We welcome the identification by settlement grouping of the key issues affecting each area. However, the identification and use of the historic environment and its issues in these sections could be improved. Halesworth and Holton are noticeable from the absence of reference to the historic environment.

Attached documents
J Janes

Section  Key issues in Halesworth and Holton

Comment ID  1208

Comment  This suggests that it would be good for more people to both live and work in the town. This is not necessarily the case for such a small town, (even if it increases in size as much as proposed). In such a small town, everyone knows each other, news spreads quickly and everyone knows everyone else's business. It is, therefore, healthier for people to travel out of town to work.

Conversely, it is better for children to attend school in their own neighbourhood. Halesworth is forever blighted by having no secondary school provision. It will be difficult to attract families with children to the proposed new housing because of this.

Attached documents
Suffolk County Council Robert Feakes

Section Key issues in Halesworth and Holton

Comment ID 1620

Comment General reference is given to the historic nature of places, but the County Council suggests that additional short references to highlight further historic distinctiveness could enhance the text and help ensure that the Plan meets the NPPF requirement to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. This context helps identify the relevant historic characteristics to be conserved, enhanced and enjoyed.

• Page 18 – Halesworth – historic town on crossing point of the River Blyth

The County Council would be pleased to advise on additional text, if the District Council is minded to make such an amendment.

Attached documents
**Key issues in Southwold and Reydon**

**beavan**

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**Comment**

We should not be building any new holiday homes. Much more than 35% of Southwold is holiday homes now. In fact they are in the majority.

Locals are being priced out of homes, shops and pubs. Southwold is becoming a toy town and will lose its attraction as a genuine seaside community.

**Attached documents**
**Historic England**

**Section**  
Key issues in Southwold and Reydon

**Comment ID**  
1364

**Comment**  
We welcome the identification by settlement grouping of the key issues affecting each area. However, the identification and use of the historic environment and its issues in these sections could be improved. We also would expect more detail on the historic environment in Beccles and Worlingham and Southwold and Reydon.

**Attached documents**
Norman Castleton

Section  Key issues in Southwold and Reydon

Comment ID  391

Comment  Key Issues in Southwold & Reydon

The number of second homes at 37% is disturbing as it is in other areas of East Anglia. What is the point of building more homes presumably for people who do not have one come from the area and then find that they are purchased as holiday homes for rental or for second homes. The exclusivity and unique character of Southwold is a major part of its attraction and it should be maintained. If this means that property priority goes to people who live in the town and need a home and second home purchases are limited then so be it. The same reasoning goes into restricting the inroads made by national retailers. Like most of the area within Waveney the District Council has not served Southwold and Reydon very well.

Attached documents
**Southwold Town Council Lesley Beevor**

**Section**  
Key issues in Southwold and Reydon

**Comment ID**  
1556

**Comment**

This is not an accurate statement, partly because it relies on 2011 census data. Decline in population in Southwold has been dramatic, due to an increase in the number of second homes and an ageing population. Whereas Southwold has seen a decline across almost all age groups, both the district and the region have seen net growth across equivalent age-groups. Since 2001, the population of the parish has fallen by 35%; the number of voters on the Electoral Roll, as of September 2017, was 799.

Southwold has a significantly higher proportion of people of retirement age than Waveney District and the East of England region; 50% of its population was 65, or older, compared to 22% in Waveney and 16% in the region. The Coastal Communities Economic Strategy (Southwold CCT Economic Plan, p.5.) states:

Although it is a highly regarded tourist destination, and an attractive place both to live and work, Southwold has a number of sustainability issues:

* a declining and ageing population;

* fewer young people and families;

* very high property values and a lack of affordable housing;

* high commercial rents and an imminent dramatic increase in business rates (April 2017);

* a majority of jobs and a local economy that is dependent on tourism;

* the majority of its housing stock is comprised of second homes and holiday lets;

* a risk to community facilities such as the library and its primary school.
Suffolk County Council Robert Feakes

Section  Key issues in Southwold and Reydon

Comment ID  1621

Comment  General reference is given to the historic nature of places, but the County Council suggests that additional short references to highlight further historic distinctiveness could enhance the text and help ensure that the Plan meets the NPPF requirement to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. This context helps identify the relevant historic characteristics to be conserved, enhanced and enjoyed.

• Page 19 -Southwold medieval origins

The County Council would be pleased to advise on additional text, if the District Council is minded to make such an amendment.

Attached documents
Key issues in rural areas

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Key issues in rural areas

Comment ID 1118

Comment On page 20 of the Consultation document the Council acknowledge that Wrentham is one of the largest villages with a reasonable provision of everyday services and facilities. Consequently it has an important role to play in terms of the Council's strategy of locating new growth in locations which have the necessary access to services and facilities. Whilst it is accepted that Wrentham has no primary school that should not be the sole determinant to define the village's place in the settlement hierarchy and particularly when there is an existing bus service to deliver children to the primary school.

We fully support the acknowledgement that Wrentham can play a significant role in accommodating new development with in the plan period.

Attached documents
Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section: Key issues in rural areas

Comment ID: 1474

Comment: Bourne Leisure requests that the employment evidence is also used to inform paragraph 5 on page 20 (Key Issues in Rural Areas, Waveney Context) which states that there are 'limited employment opportunities in rural areas'. As drafted, the text does not recognise the employment contribution from established tourism facilities, such as Corton and Gunton Hall Coastal Villages, in rural areas, nor the importance of planning policy continuing to support such important assets to the rural economy (para. 28 NPPF). The Company therefore requests the following addition to the end of the paragraph: "There are limited employment opportunities in the rural areas and most residents depend on nearby towns for employment. However, there is some evidence of reverse commuting where people employed in rural industries are living in towns, Established tourism businesses provide important employment opportunities for rural communities; these should continue to be supported."

Attached documents
Chris Greenhill

Section  Key issues in rural areas

Comment ID  757

Comment  I am concerned that the new sites identified in villages in the local plan are inconsistent with sustainability objectives. Few villages in Waveney have many facilities or job opportunities, so most residents, existing and new, will need to travel to surrounding towns for shopping, work, education, recreation etc. There may be social benefits in expanding village populations, but this is countered by the additional number of car or motorcycle journeys which will arise from this pattern of development.

Attached documents
Historic England

Section  Key issues in rural areas

Comment ID  1368

Comment  We welcome the identification by settlement grouping of the key issues affecting each area. However, the identification and use of the historic environment and its issues in these sections could be improved. For the rural areas an outline of the historic character of these settlements, the settlement pattern and any notable common features or pressures on the historic environment would be welcomed.

Attached documents
Jenny Sheahan

Section | Key issues in rural areas

Comment ID | 666

Comment | In addition to access to fast broadband, mobile reception is also important. There are several 'black spots' around Mutford, where no signal is available regardless of provider. Providers should be required to work together to install better/ more transmitters in order to ensure 100% coverage in rural areas.

Attached documents
South Norfolk District Council Adam Nicholls

Section  
Key issues in rural areas

Comment ID  
1584

Comment  
• The importance of broadband for economic development in rural areas is noted and supported. As a similarly rural district, South Norfolk Council would be keen to work with Waveney to improve broadband speeds in rural areas.

Attached documents
Vision

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Vision

Comment ID 1119

Comment Support is given to the draft 2036 Vision for Waveney. The vision sets out the aspirations for the District which would be attractive for both existing and new residents. The Vision also makes reference to employment, retail, and the natural environment.

Specific support is expressed for the following references on pages 22 -24 within the Vision section of the Plan, including the vision for rural areas such as Wrentham:

* "There will be sufficient housing of the right types and tenures to meet the needs of the population and people moving to the District";

* "Through allowing more growth than in recent years, settlements in the rural areas will become more sustainable and vibrant".

The Benacre Company believe that the delivery of the proposed site allocations in Wrentham will contribute towards the level of housing growth necessary to meet the objectively assessed need over the plan period in accordance with Paragraph 47 of the NPPF. In such a context, it is entirely appropriate that the Council look to a number of settlements to accommodate growth.

Attached documents
Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

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**Comment**

Bourne Leisure supports the recognition in the 'Economic Key Issues' infographic at page 12/13 of the Draft Local Plan (Waveney Context) which states that tourism is 'an important sector to the economy' and that 'jobs in the accommodation sector have been increasing and are projected to increase further". The Company also supports the following statement at paragraph 1.1 of the Draft Local Plan which forms part of the 'Vision' for the District:

'Tourism will remain an important year-round part of the District's economy and visitor numbers and overnight stays will have increased.'

The statements align with national planning policy which states that local planning policy should recognise and support sustainable rural tourism and leisure developments that benefit businesses in rural areas, including the 'the provision and expansion of tourist and visitor facilities in appropriate locations...' (NPPF, para. 28).

Bourne Leisure also supports the Council's use of employment land needs evidence to support the preparation of the Draft Local Plan (para. 1.11). The Company particularly endorses the statement identifying how the tourism sector will be one of the most likely sectors for employment growth in the District.

**Attached documents**
Broads Authority Natalie Beal

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**Comment ID**
461

**Comment**
The Broads is not a National Park for planning purposes. It has a status equivalent to a National Park.

**Attached documents**
David Hurren

Section Vision

Comment ID 852

Comment Rural Areas.

Mutford has none of the infrastructure or facilities mentioned in the above vision; like shops, local transport, pubs etc. It is therefore unable to support retired older people and young families, which is the kind of groups that 1 and 2 bedroom small and low cost properties will attract. It is explained in the narrative that larger properties are required in the smaller hamlets as these properties attract families that are older and more able to manage without support. Mutford also already has a good percentage of small low cost properties as there are many terraced properties that are original. A group of larger properties would serve the village better as these people would be more self sufficient.

Attached documents
David Rogers

Section
Vision

Comment ID
1089

Comment
Whilst the local first-draft plan has much to commend in terms of re-generation of Lowestoft in particular, other central issues are much more questionable.

The Vision (1.1, page 22) is extremely optimistic and is based on a combination of best scenario hopes – not, I suggest, facts and realities.

Attached documents
Environment Agency

Section Vision

Comment ID 857

Comment We generally agree with the vision included in the local plan, in particular we welcome the inclusion of a desire to protect, maintain and enhance the protected landscapes of the Broads national park and areas of outstanding natural beauty. We also support the vision in regards to protecting more properties from flooding and the effects of coastal change. The vision indicates a desire to ensure water quality does not worsen. We would prefer a vision that sought to maintain and improve water quality.

Attached documents
Forcecore Limited (Wheatman Planning Ltd) A Darling  
Wheatman Planning Ltd. (Deirdre Linehan)

Section Vision

Comment ID 1198

Comment Overall Spatial Strategy

On behalf of our client Forcecore Limited we object to the First Draft Plan as we do not consider that the proposed housing allocations within the First Draft Plan will enable the objectives of the overall spatial strategy to be achieved.

Under the heading "Lowestoft, Carlton Colville, Oulton and Oulton Broad" paragraph two it is stated "...The town will have accommodated the majority of the District’s growth and will have expanded in size with well designed, sustainable extensions to the urban area which have their own identity."

It is assumed the ".. sustainable extensions to the urban area..." refers to the two large proposed allocations in North Lowestoft (WLP2.12) and Carlton Colville (WLP2.15). These two sites combined extend over 133.4 hectares and are expected to deliver 2200 homes in addition to employment land, new primary school, country park and retail facilities to serve local needs.

The text accompanying the allocation in North Lowestoft however states that the development of area is a longer term ambition and development is not likely to start until 2026. It is also expected that only a little over half of the proposed housing will be delivered during the current local plan period, 740 homes, with the remainder being delivered between 2036 and 2044.

The accompanying text to these proposed allocations acknowledges that both sites are beset by issues that have the potential to delay development and the delivery of housing including but not exclusively, access to the sites, flood risk, archaeological significance and landscape impact. There is also the likelihood that the development of these sites will require co-operation between different developers that can also often result in delays. The final
numbers delivered therefore could be less than what is expected given the level of "unknowns" that can be applied to both sites

It is considered therefore the Council are being overly optimistic in their expectations of these sites and the level of development that can be expected of them during the plan period that will allow them to contribute to the vision and objectives identified in the overall spatial strategy.

G Youlden  
Wheatman Planning Ltd. (Deirdre Linehan)

**Section**  
Vision

**Comment ID**  
1192

**Comment**  
Overall Spatial Strategy

On behalf of our clients Mr & Mrs Youlden we object to the First Draft Plan as we do not consider that the proposed housing allocations within the First Draft Plan will enable the objectives of the overall spatial strategy to be achieved.

Under the heading "Lowestoft, Carlton Colville, Oulton and Oulton Broad" paragraph two it is stated "...The town will have accommodated the majority of the District’s growth and will have expanded in size with well designed, sustainable extensions to the urban area which have their own identity."

It is assumed the ".. sustainable extensions to the urban area..." refers to the two large proposed allocations in North Lowestoft (WLP2.12) and Carlton Colville (WLP2.15). These two sites combined extend over 133.4 hectares and are expected to deliver 2200 homes in addition to employment land, new primary school, country park and retail facilities to serve local needs.

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The accompanying text to these proposed allocations acknowledges that both sites are beset by issues that have the potential to delay development and the delivery of housing including but not exclusively, access to the sites, flood risk, archaeological significance and landscape impact. There is also the likelihood that the development of these sites will require cooperation between different developers that can also often result in delays. The final
numbers delivered therefore could be less than what is expected given the level of "unknowns" that can be applied to both sites

It is considered therefore the Council are being overly optimistic in their expectations of these sites and the level of development that can be expected of them during the plan period that will allow them to contribute to the vision and objectives identified in the overall spatial strategy.

Attached documents
Historic England

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<tr>
<th>Comment ID</th>
<th>Vision</th>
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<tr>
<td>1369</td>
<td>We would recommend some small amendments to the fourth paragraph of the overall vision to anchor the historic environment in your strategic vision:</td>
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<tr>
<td></td>
<td>&quot;Waveney’s valuable built, historic and natural environment will have been protected, maintained and enhanced.&quot;</td>
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<td></td>
<td>&quot;...new development will have respected the rich historic environment of the District including XXXXXX&quot;</td>
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<td></td>
<td>We have deliberately not completed the sentence as it is for the Local Planning Authority to determine what heritage assets they would wish to use to illustrate their distinctiveness.</td>
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<tr>
<td>Lowestoft, Carlton Colville, Oulton and Oulton Broad p23</td>
<td>We are surprised to see that the vision for the historic High Street is not embedded at this level. The role the historic environment in shaping Lowestoft in particular is not reflected in this high-level vision.</td>
</tr>
<tr>
<td>Beccles and Worlingham p23</td>
<td>We welcome the commitment to maintaining the two separate identities of the settlements. Again, we are surprised that the historic environment does not form part of the vision for the future of these historic settlements.</td>
</tr>
<tr>
<td>Bungay p24</td>
<td>We welcome the identification of the open areas within the town and the landscapes surrounding the town, however, the role the historic environment has in shaping the future of Bungay is not clear.</td>
</tr>
<tr>
<td>Halesworth and Holton p24</td>
<td>We welcome the identification of the historic town centre, which is absent from the key issues section. We welcome the identification of the</td>
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importance of the separate identities of the settlements and the landscape surrounding them, however, it is unclear what role the historic environment has in the proposals for Halesworth to become a more significant service centre.

Southwold and Reydon p24

We welcome the identification of Southwold as an historic town. The historic environment in Southwold is key to its current and future role and this should be explored in its vision. In addition, we would recommend a small amendment: "The sensitive built, historic and natural environment..."

Rural areas p24

We would welcome further clarification on how the proposed growth will work with the historic character of the settlements to ensure the long-term sustainability of the historic environment in those rural locations.

Attached documents
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**Attached documents**
James Servaes

Section Vision

Comment ID 49

Comment Up to this point in the Draft Plan there has been no mention of policy for use of BROWNFIELD SITES. This makes the vision sound somewhat hollow particularly around Bungay where all zoned development is shown on environmentally important and sustainable farm land, which in the past had contained many hedges, ditches, copses of value. It also just happens to belong to one landowner, no doubt the same who is "surrendering" his greenfield sites in Rumburgh and Ilketshall St Lawrence. This may lead to further investigation.

Attached documents
Larkfleet Homes -
Seth Williams

Section
Vision

Comment ID 1477

Comment
The Draft Local Plan sets out a vision for the District and objectives of the Plan to deliver this. Whilst we welcome the aspirational nature of the Plan’s vision in most regards we note that the approach to housing growth is more guarded and reserved. However, in order to deliver economic growth to the District, address social deprivation and enhance the availability and quality of community facilities and infrastructure, it is our view that it is essential for the Plan to positively address both currently identified housing needs and to allow for aspirational growth to support these aims.

It is clear from our involvement with the area that local residents have many reasons to value their towns, villages and the District in general but it is equally clear that there are numerous concerns and reservations that they would wish to see addressed.

Many residents’ primary concerns tend to focus around issues of availability of both jobs and homes, of issues of social deprivation and the lack of community facilities and infrastructure.

In respect of homes, particular concerns exist for ‘first time buyers’, young families and elderly residents seeking to ‘downsize’. The ability to own a home remains an unachievable aspiration for many due to issues of affordability and the availability of the correct type of housing stock.

The District continues to suffer from a high rate of unemployment, with a rate higher than that of both the County and the national. The average annual wage is also below both the regional and national averages.

It is clear therefore that the vision for the Local Plan must seek to support a substantial level of new housing growth to both address existing issues and to support and encourage future economic growth and prosperity in the area.
With respect to Beccles, the aspiration must be to maintain the vitality and character of the historic market town which is highly valued by its residents and visitors alike.

Through the course of our client’s public engagement to date, it is evident that the concerns regarding lack of availability of housing and jobs are as relevant to Beccles as the wider Waveney. In particular, at Beccles, with respect to homes, there is apparently a demand locally for ‘starter homes’ and homes for the elderly including bungalows or a retirement community.

Other issues arising which are specific to Beccles concern the perceived inadequacy or lack of community facilities; in particular healthcare provision, a community centre/indoor sports hall, primary school, bus services, local shops, useable green open space, playing fields and allotments.

We submit that the vision for Waveney’s new local plan should be seeking to address these issues by seizing on the opportunities the District offers and maintaining its special and distinctive character and A fundamental component of the emerging Plan, and one of its key visions must be to meet the full identified need for new housing, and infrastructure to support, over the period to 2036.

With specific reference to the vision for Beccles and Worlingham, we note the aspiration that the "separate identities of the two settlements will also have been preserved". Whilst this would in many cases be a laudable objective, it is our view that the specific circumstances of Beccles and Worlingham are such that there is nothing in the way of physical distinction between the two settlements. Notwithstanding their separate parish areas, the two settlements form part of a continuous urban area having coalesced many years previously. Services and facilities are shared equally between the two administrative areas without distinction. It is therefore apparent that an aspiration to maintain separation is unfounded and unachievable.

Notwithstanding the absence of physical separation, we appreciate that the character and local distinctiveness of the existing urban area - and character areas within it – are important qualities which are valued. We would therefore suggest the vision should be amended to reflect an aspiration to respect local character and distinctiveness rather than seek to preserve a separation which does not exist.

**Attached documents**
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section
Vision

Comment ID 923

Comment We object to the statement, in relation to Lowestoft, at page 23 that: 'The town will have accommodated the majority of the District's growth and will have expanded in size with well designed, sustainable extensions to the urban area which have their own identity.' The Council is over-relying on the delivery of large-scale development during the plan period. Such developments are notoriously slow to deliver, and the infrastructure in and around Lowestoft will need to be upgraded to support such large-scale development.

Attached documents
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section Vision

Comment ID 925

Comment We support the statement, in relation to rural areas, at page 24:

'Through allowing more growth than in recent years, settlements in the rural areas will become more sustainable and more vibrant. Through the provision of a wide range of types and tenures of housing, new homes will be more affordable in the rural areas, allowing people with a local connection or those who work in the rural areas to live in the rural areas. New housing will also help support existing services and facilities in the rural areas such as small rural schools and pubs. New development in rural villages will have increased the coverage of high-speed broadband.'

Attached documents
Michael North  
Artisan PPS Ltd (Leslie Short)

Section  Vision

Comment ID  1490

Comment  Whilst we have no fundamental objection to the adopted spatial strategy in the First Draft Plan we are concerned that the overall level of housing need as identified and to be accommodated within housing allocations proposed within the Plan is insufficient to meet a full objectively assessed need. This is particularly the case in respect of the recently published DCLG document 'Planning for the Right Homes in the Right Places: Consultation proposals.' Within that consultation paper there is a proposed standardised approach to the calculation of local housing need. If this adopted, which seems highly likely, this means that the housing need methodology underpinning and underlying the evidence base of the proposed First Draft Plan, ought to be reviewed immediately on the basis that the plan will no longer cater for full objectively assessed housing need in accordance with the National Planning Policy Framework.

We subscribe to the Government's approach (as first identified in the Housing White Paper) to a standardised methodology of assessment of local housing need. We respectfully suggest to the Council that the method set within the Government’s proposed approach be adopted for the purpose of calculating the housing need for the new Plan. Whilst with the plan is well advanced compared to others, it is nowhere near formal adoption and will be subject to challenge and is at a pivotal point where allocations are first being considered. In our opinion, it would be a highly appropriate time to consider the underlying methodology upon which the major allocations in the plan are based. To do otherwise would not be sound.

Even the recently published PBA 2017 Report of the Strategic Housing Market Assessment in all probability, does not reflect the full objectively assessed need for housing and economic development as outlined in the Framework but now to be overtaken by the standardised methodology.
comprised within the consultation paper.

Attached documents
Norman Castleton

Section Vision

Comment ID 1201

Comment Waveney plan overall strategic thinking for the area

The problems with this plan are that it is fragmented and based on out of date planning ideas, in this case mainly from the 1960s. The plan lacks holistic and larger overall strategic thinking with piecemeal developments without thought about the consequences concerning the environment and services plus employment. The development concerning roads and transport are dependent upon factors occurring at the time of implementation or the beneficence of speculative builders. As it stands in its disjointed form it is a speculative builders charter without regard to the overall effect in Waveney. What does houses built to the highest architectural standards mean? If the estate housed built in recent times are anything to go by then they are not of any standard at all. The likely environmental consequences or influences of all this development is not considered but it should be. Where is the employment coming from? If part of the answer is tourism then why should holiday makers then what attracts holiday makers and the answer will be not another over developed area full of drab estate houses. What will be the effect of rising seas levels and what efforts will be required to offset this. Where are the medical & educational facilities to treat all these extra people? So little linked up thinking is in this plan and it needs a complete revision.

R G Meadows & Son - Savills (UK) Ltd (Jonathan Dixon)

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**Comment**

We support the Vision for the Local Plan which is considered aspirational yet realistic, and seeks to promote significant levels of growth within environmental limits. New growth and investment is important in the District to help tackle social deprivation which is most apparent in the Lowestoft area.

Specific support is expressed for the following references of the Vision:

* "There will be sufficient housing of the right housing types and tenures to meet the needs of the population and people moving to the District."

* "The town [Lowestoft] will have accommodated the majority of the District's growth and will have expanded in size with well designed, sustainable extensions to the urban area which have their own identity."

**Attached documents**
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Vision

Comment ID 1321

Comment We support the overarching vision (page 22) of the draft Local Plan, with particular reference to the need to sustainably improve the quality of life for everyone living in, working in or visiting Waveney.

With reference to the section of the 'Vision' relating to Halesworth and Holton (Page 24), we would strongly support the significant role that Halesworth plays in being a service centre on the southern edge of the District. In particular, we would emphasise the role it has in servicing villages in both Waveney and the adjoining Suffolk Coastal District. In addition to the provision of much needed housing, there is a need to re-vitalise the sports & leisure, health and employment opportunities in the town that has been lacking in the recent past.

Attached documents
Robert Gill

Section Vision

Comment ID 580

Comment We are seriously concerned about the way in which new housing is planned to be distributed across the Waveney area. More new developments should be built in the Lowestoft area, with the allocation in Beccles/Worlingham/Ellough reduced accordingly. Our reasoning is that Lowestoft is a town which has immense potential, especially with the burgeoning off shore wind industry and the third bridge. Lowestoft would greatly benefit from the improved retail and leisure opportunities that new developments will bring, and this should bring about the regeneration of the sea front and the High Street/shopping area. Conversely, Beccles is a vibrant and self-sufficient market town and does not need additional population, apart perhaps, from a smaller number of affordable houses to help young people stay in the immediate area. More housing and therefore population will have a detrimental impact on Beccles in terms of increased traffic and parking difficulties. It will spoil the pleasant ambience of the town and may lead to reduced footfall in the shops and restaurants/pubs, due to people being reluctant to come into the town if they cannot park.

Attached documents
Simon Phillips

Section  Vision

Comment ID  1043

Comment  I agree with this spatial strategy

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section | Vision

Comment ID | 988

Comment | 2.0 Comments on Section 1 Overall Spatial Strategy

Vision – Rural Areas

2.1 The consultation document sets out the future Vision for the district over the plan period.

2.2 The Somerleyton Estate support the Rural Vision because it recognises the need to facilitate higher levels of growth in rural areas to redress the trend over previous plan periods which have also seen the loss of community facilities and services such as school places, bus services, village pubs etc.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Vision

Comment ID 1420

Comment The consultation document sets out the future Vision for the district over the plan period.

The Sotterley Estate support the Rural Vision because it recognises the need to facilitate higher levels of growth in rural areas than has been the trend over previous local plans; plan periods which have also seen the loss of community facilities and services such as school places, bus services, village pubs etc.

Attached documents
South Norfolk District Council Adam Nicholls

Section Vision

Comment ID 1585

Comment • Overall South Norfolk Council is supportive of the proposed Vision, particularly the cross-boundary references to villages in South Norfolk in relation to the sections on Beccles and Bungay. The Council supports the structure of the vision, with a general section and then more detailed visions for individual settlements.

Attached documents
Southwold Town Council Lesley Beevor

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| Comment ID | 1565 |

| Comment | Although the draft Local Plan identifies that most of the economic growth is coming from small companies, the Vision sees growth as coming, only, from the energy sector in Lowestoft. The Vision should recognise the role of small businesses and entrepreneurs to support a policy that provides facilities for them within towns, and not just within industrial/business parks. Creative businesses, whether artisan or digital, prefer to be in town centres because of the vibrancy and availability of cafes and meeting places, for example. Town Centre employment is attractive for families, too, because it tends to be close to creches, nurseries and schools. |

| Attached documents |   |
Southwold Town Council Lesley Beevor

Section  Vision

Comment ID  1557

Comment  The section on the vision (page 24) for the future of Southwold and Reydon needs to be adjusted to reflect the sustainability issues identified in our NP and the outcomes it is seeking – stopping demographic decline, the hollowing out of the community and rebuilding community through housing that is affordable to a wide range of people. And, further, housing that is for people to live in full time, employment space within the town, and adequate community facilities for changing community needs. Southwold's vision for itself is to be a living community witnessing a growth in micro and small business employment, as an alternative to an over reliance on tourism. This is reflected in the Coastal Community's strategy.

There is nothing in the Vision about lowering car use although this is within certain policies. It should be remembered that Southwold has acute and chronic parking problems.

Attached documents
Suffolk County Council Robert Feakes

Section Vision

Comment ID 1659

Comment

As noted on Page 8 of the draft Plan, Waveney has low levels of participation in physical exercise. Data from the County Council’s Public Health Team highlights the significant health challenges which Waveney faces, to which low levels of exercise can be attributed.

The NPPF, in paragraph 171, states that local planning authorities should take account of the health status and needs of the local population. Plans should set out strategic priorities for transport and health (paragraph 156). Paragraph 75, within the chapter on health and wellbeing, requires that 'planning policies should protect and enhance public rights of way and access'.

The Plan sets out a Vision for the District which states that 'Waveney will have a healthy economy, a healthy population and a healthy environment.' Improving health is the first objective of the Plan. Public Rights of Way can contribute to health objectives. Public Rights of Way:

- Encourage travel by sustainable modes, reducing pressures on the vehicular highway network.

- By encouraging and enabling physical activity, improve physical and mental health and wellbeing.

- Give access to the local natural environment with all its attendant health benefits.

- Support the tourist economy and offer recreational opportunities for residents.

- Can help manage the impacts of development on sensitive habitats and species.

Whilst the Plan does give consideration to specific measures required to protect and enhance the walking and cycling network, and a general requirement is established in the Landscape Character policy (WLP8.33) it is...
not clear that a comprehensive approach to Public Rights of Way is set out. The District Council should give serious consideration to including policy wording and accompanying supporting text which enables and requires comprehensive consideration of the variety of benefits which Rights of Way provide. The County Council would be pleased to discuss ways of amending the Plan to include this consideration.

Attached documents
### Suffolk County Council Robert Feakes

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**Comment ID** 1622

**Comment** The County Council suggests that the historic environment could be integrated further into aspects of the Vision:

- Page 23: The vision for a heritage offer for Lowestoft (mentioned on page 44, objective 3) could be integrated here.

**Attached documents**
The Vision for Bungay is generally supported. However, the Vision should also include the need for additional retail facilities, including supermarkets to help enable the town to become more self-sufficient in its retail offer and support existing and proposed new growth. The Objectives should also include meeting the shopping needs of the towns and neighbouring rural areas, particularly as there is currently unmet need for 1,564 sqm of food store retail development over the plan period.

It is noted that the Vision suggests that Bungay should accommodate 'modest' levels of housing growth, but the key diagram suggests the town should accept 'reasonable' levels of growth. It is suggested that the Vision needs to be consistent with the key diagram and needs to refer to 'reasonable' growth rather than 'modest'.

Required Changes:

Amend the Vision for Bungay and Objective to refer to the need for Bungay to accommodate additional retail facilities; Amend the Vision for Bungay to refer 'reasonable' housing growth rather than 'modest' growth; in line with the Key Diagram.
Warnes & Sons LTD B Warnes
Wheatman Planning Ltd. (Deirdre Linehan)

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Comment ID 935

Comment

Overall Spatial Strategy

On behalf of our client Warnes and Sons Limited we object to the First Draft Plan as we do not consider that the proposed housing allocations within the First Draft Plan will enable the objectives of the overall spatial strategy to be achieved.

Under the heading "Lowestoft, Carlton Colville, Oulton and Oulton Broad" paragraph two it is stated "...The town will have accommodated the majority of the District’s growth and will have expanded in size with well designed, sustainable extensions to the urban area which have their own identity."

It is assumed that "sustainable extensions to the urban area..." refers to the two large proposed allocations in North Lowestoft (WLP2.12) and Carlton Colville (WLP2.15). These two sites combined extend over 133.4 hectares and are expected to deliver 2200 homes in addition to employment land, new primary school, country park and retail facilities to serve local needs.

The text accompanying the allocation in North Lowestoft however states that the development of this area is a longer term ambition and development is not likely to start until 2026. It is also expected that only a little over half of the proposed housing will be delivered during the current local plan period, 740 homes, with the remainder being delivered between 2036 and 2044.

The accompanying text to these proposed allocations acknowledges that both sites are beset by issues that have the potential to delay development and the delivery of housing including but not exclusively, access to the sites, flood risk, archaeological significance and landscape impact. There is also
the likelihood that the development of these sites will require cooperation between different developers that can also often result in delays. The final numbers delivered therefore could be less than what is expected given the level of "unknowns" that can be applied to both sites.

It is considered therefore the Council are being overly optimistic in their expectations of these sites and the level of development that can be expected of them during the plan period that will allow them to contribute to the vision and objectives identified in the overall spatial strategy.

Watts

Section Vision

Comment ID 221

Comment With regard to Reydon, why has the Council approved the St. Felix School development if the intention is 'to protect and enhance the natural environment of the area'?

With regard to Halesworth, if there is already a 'vibrant' town centre (i.e. The Thoroughfare), why is there a need for any further retail development?

Attached documents
Objectives

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

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**Comment**

However, the Company considers that this employment-related evidence has not been used as effectively as it could be, to inform key areas of the emerging Plan.

The Draft Plan does not include a specific, tourism-related objective at Section 1.2. Therefore, to ensure that there is a clear framework for tourism development in Waveney working towards achieving the Vision (as referred to above) and to ensure the District can benefit from predicted employment growth in the tourism industry, Bourne Leisure considers the following Objective should be added to section 1.2:

9. To support growth in the tourism industry through increases in visitor numbers and overnight stays in the District.

Attached documents
Clare Mackney

Section  Objectives

Comment ID  730

Comment  District-wide policies

1. It is difficult to understand why the draft Plan’s first objective is 'to improve health, well-being and educational opportunities for the population', when these are goals that the land use planning system can only achieve very indirectly, if at all. Environmental improvement and provision of land for appropriate development should be the Plan’s primary objectives.

Attached documents
Historic England

Section | Objectives

Comment ID | 1370

Comment | Whilst we welcome the principle of objectives 3, 5 and 7, as currently drafted the objectives do not form part of a positive strategy for the historic environment. As a minimum, objective 3 should be amended to read: "To enhance and protect the natural, built and historic environment." However, given this is an early draft of the Local Plan, consideration should be made as to whether the objectives can be made less generic and more locally specific.

Attached documents
**M Chatfield**

**Section**  
Objectives

**Comment ID**  
258

**Comment**  
[WLP3.1] How will it improve the health of the population? & especially how will it protect and enhance the environment when it has destroyed valuable farm land?

**Attached documents**
Making Waves Together Helen Johnson

**Section**  
Objectives

**Comment ID**  
999

**Comment**  
Objectives for Central and Coastal Lowestoft:

(4) Enhance the vitality and viability of Lowestoft Town Centre

(6) Enhance the Tourism offer of the area

(7) Enhance the quality of design and the public realm

(10) Improve the natural, historic and built environmental quality of the area.

A stronger reference to culture, arts and heritage in the context of growth, urban design, health and wellbeing will be favoured.

**Attached documents**
Norman Castleton

Section Objectives

Comment ID 402

Comment Vision & Objectives: The vision & objectives as stated are fine but by concentrating on old outdated ideas of growth which are unsustainable they will not be achieved. The idea that we can go on using up more and more of the Earths resources and hoping that the natural world will be able to recover and sustain more of the same is dangerous and totally unrealistic. The proposed plan includes more and more areas on the periphery of the main conurbations to be built on with houses and roads. This will in itself cause more and more environmental problems with calls on fossils fuels, water & energy resources. The warning signs are already there with increasing temperature rises, floods and winds, forest fires and reducing wild animal, fish and birds populations. Instead of persisting with this outdated growth plan using up more and more natural resources we should be thinking in terms of reducing the impact of today so there can be a tomorrow. Plan according to the 'precautionary principle'. E.g. Build within built up areas on brown field sites only, plant trees and encourage the use of electric vehicles, public transport, foot and pedal power access. Improve the education system and bring in knowledge industries using the internet.

Attached documents
I have reservations about no. 5: How can economic growth be "sustainable"? As the economist Kenneth Boulding said, "Anyone who believes exponential growth can go on forever in a finite world is either a madman or an economist." Simon Kuznets, who devised GDP in 1934 to help the US Government avoid a future crash [doesn't seem to have worked, does it?], warned against its use as a measure of welfare, yet that is exactly how it is now used. Putting the buzz-word "sustainable" in front of it doesn't change reality.

We need to recognise that all Gross Domestic Product does is measure the movement of money around the economy, whether for good or for ill, measuring quantity, not quality or value, the things that matter: it ignores everything where money does not change hands. Planners should be working with the New Economics Foundation, Kate Raworth and many other like-minded people to find a better measure of wellbeing and progress.

Otherwise, I generally support these objectives.
Simon Phillips

Section Objectives

Comment ID 1044

Comment I agree with these objectives to deliver the spatial strategy

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section  Objectives

Comment ID  989

Comment  Vision - Objectives

2.3 The consultation document sets out the objectives by which the District Council will achieve the Vision.

2.4 The Somerleyton Estate supports Objectives 2 (to meet housing requirements in both urban and rural areas) and 6 (to enhance service provision in villages which aim to meet the housing requirements of the rural areas and to enhance service provision in villages.)

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Objectives

Comment ID 1421

Comment
The consultation document sets out the objectives by which the District Council will achieve the Vision.

The Sotterley Estate supports Objectives 2 and 6 which aim to meet the housing requirements of the rural areas and to enhance service provision in villages.

Attached documents
South Norfolk District Council Adam Nicholls

Section Objectives

Comment ID 1586

Comment • South Norfolk Council is supportive of the proposed Objectives, which seem to cover all the main areas necessary.

Attached documents
Southwold Town Council Lesley Beevor

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<tr>
<th>Section</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1567</td>
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<tr>
<td>Comment</td>
<td>Number 8 should emphasise sustainable transport as part of infrastructure.</td>
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</table>

Attached documents
Suffolk County Council Robert Feakes

Section Objectives

Comment ID 1623

Comment

The County Council suggests that the historic environment could be integrated further into aspects of the Vision:

• Page 25 1.2 Objectives to deliver vision, objective 3 – the County Council would encourage amendment to: 'To enhance and protect the natural, historic and built environment'.

Attached documents
Scale of Growth

Ali Smith

Section Scale of Growth

Comment ID 328

Comment I would have liked a better indicator of what the housing split is.

9,00 new homes, not many is it!

How many would be social housing?? How many wealthy ex Londoners. Will the people of the town have their needs met?
Barnby Parish Council Jayne Evans

Section Scale of Growth

Comment ID 1235

Comment The view of Barnby Parish Council on the Waveney Plan is as follows.

General views on Waveney Local Plan

The number of new homes required in the Waveney Local Plan was questioned because there are 11,000 empty houses at present in the area.

Attached documents
Beccles Society Paul Fletcher

Section Scale of Growth

Comment ID 677

Comment

We acknowledge the amount of work carried out by independent consultants in assessing the housing, employment and retail requirements for Waveney for 2036, and although some of these figures may in future be affected by Brexit, we have to accept the calculations as they stand.

However, the increased numbers that have been allocated for housing, for example, over and above the consultants’ figures, to take into account possible lack of progress of development in some areas, seems unreasonable in relation to Beccles.

In our case the 2 allocated sites for housing are prime locations which in theory are likely to be developed to the full extent. By increasing the numbers here we are going from 15% of total housing allocation to 16.37%.

We find this additional housing unnecessary and it will only add to the burden on the total infrastructure problems in Beccles.

Nevertheless, we thoroughly approve of and support the Garden Village principle of development and would look for strict adherence to this concept at each future stage.

Attached documents
Broads Authority Natalie Beal

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<tr>
<td>Comment ID</td>
<td>464</td>
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**Comment**

1.7, 8.2 – does this OAN include the OAN of the Broads part or exclude?
Suggest this needs to be clear. We did raise this at the first consultation stage.

Attached documents
Chris Clutten

Section Scale of Growth

Comment ID 1389

Comment In order to comment on the proposed plans with any degree of an informed response it would be most helpful if the proposers of these plans could clarify the following relevant points.

* The logic or sense behind plans that appear to have been produced with little or no consideration to the environment, future generations or the people currently living here. If you have so much surplus cash then why not sort out the access roads leading to the town, that at least, just might help to encourage more business to invest in this area.


* With regards to Q1 we were told by a planner that the proposed scheme is being forced on them by government, in light of what Mr Gove has said how can this be true?

* Are flat greenfield sites being proposed for building simply because it is easier and cheaper to build on than brown field or undulating land? Understandable if you are a developer but unacceptable environmentally and for the people who live here. Has priority been given to developers rather than the residents of Waveney?

* Feeding the people, two world wars have already shown that this country can not grow enough food to feed its population. What sense then is there in increasing the population and decreasing what agricultural land that we do have? Underground farms is this what is planned for future generations. Ref TV report 29/08/2007?

* Food parcels from Europe, is this the answer to Q5?

* Floods, every time we turn the TV on there seems to be another report of
flooding, is it surprising with so much of the land already covered with concrete. The current plan will only increase this problem; has this even been considered? Or is it to be left for another generation to sort out?

* Why is strategic gap only relevant when it suits?

* If houses are needed so badly, why have sites such as Sanyo, Zephyr cams and Oulton Broad boatyards etc been left empty? There are also many small neglected sites that could be in filled, we are all being told to be more environmentally conscious, please explain why this does not seems to apply to the planning office?

* What jobs? Where are all these mystery jobs coming from?

* Please advise what companies are planning to set up or relocate to Lowestoft?

* Why not produce the jobs then we would know what houses are needed?

* Why would anybody with enough get up and go and determination to be employed want to move to a town without jobs.

* Bottle necks in the town will be far worse. How will increasing and producing more pollution, down time and waste of natural resources (fuel) be an incentive for companies to set up and or relocate here? The Millenium Way traffic lights are already causing congestion before the new bridge is even built.

* WLP2.12 would create additional access points and speed restrictions on the main road (now A47) creating more bottle necks but this time before anyone even gets to the town?

* What industry would want the additional transport costs this whole scheme would create?

* Hospitals and other services that imported people will require (current waiting time for a hospital appointment currently running at many months). Hospital appears to be at breaking point what facilities are planned to cover for the needs of the perceived massive increase to town’s current population?

* Why another cinema, we had the best cinema/theatre for many miles but the planners decided the town would be better served by a newsagent and stationery shop (another example of not thinking ahead the same will happen with our countryside. When it’s destroyed it’s gone for good.
* Talking to friends and colleagues, I know I am not alone in seeking constructive answers to these and many more such questions.

Attached documents
Chris Greenhill

Section
Scale of Growth

Comment ID
756

Comment
I may not have understood the demographic data fully, but as far as I can make out, the population and housing projections for the District are those set out in the SHMA pt 1 Table 10.2 which has as its source ONS/CLG. Does this mean that these projections are effectively 'handed down' and not subject to investigation?

I note that the housebuilding rates projected seem to be quite at variance with long term trends in housebuilding shown in Fig 11.1 and fig 11.2 to the SHMA. Annual housingbuilding completions dropped from 574 p.a. in 2001/2 to 135 p.a. in 2015/6. How do you think the industry will be able to deliver the rates projected in the draft local plan?

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section | Scale of Growth

Comment ID | 1169

Comment | Other matters of particular strategic cross-boundary importance for the Borough Council are considered to be adequately addressed in the Waveney draft local plan. These include including meeting your objectively assessed housing needs and the approach to coastal change management (policy ref. WLP8.25).

Attached documents
Home Builders Federation Mark Behrendt

Section | Scale of Growth
---|---

Comment ID | 899

Comment | Housing needs

The Council sets out in the draft local plan that its objectively assessed need for housing (OAN) is 8,223 new homes at 374 dwellings per annum. The recent publication of the consultation for the standardised approach to assessing housing needs suggests that whilst the Council’s assessment of need is higher it is not significantly different. Given that this is still a consultation document only minimal weight can be given to its content at present. However, it does provide an indication as to what the Government considers to be an appropriate assessment of housing needs and how market signals should be taken into account. It also confirms that the Government attach significant weight to the robustness of the Household Projections as outlined in Planning Practice Guidance. It is therefore important that the Council continues to ensure that its own assessment of needs are appropriate and in line with current national policy and guidance.

As such we would argue that the Council might need to consider an uplift to take account of the high need for affordable housing that has been identified in the SHMA. Part 2 of the SHMA identifies that the annual affordable housing need is for 208 additional properties, which equates to 55% of the annualised OAN. Given that PPG states that: "An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes" and the Council has indicated that it would expect to see 35% affordable housing contributions we would expect the Council to increase its housing requirement in order to support the delivery of new affordable homes alongside market housing. We would therefore suggest that this level of affordable housing need is justification for increasing the Council total housing requirement.
Attached documents
Home Builders Federation Mark Behrendt

Section Scale of Growth

Comment ID 900

Comment Housing Supply

It would appear that the Council is looking to deliver its shortfall within the first five years of the plan, however, we would welcome clarification of this in future iterations of the Local Plan. However, we are concerned that the Council has not applied a lapse rate to its existing housing commitments. It is unlikely that all the housing on these sites will come forward either through sites not being brought forward or coming forward at a later date with reduced numbers. Good practice and our experience from other local plans would suggest that a lapse rate of at least 10% is applied to all existing planning permissions.

We would agree with the Council's conclusions in the 2016 statement on five-year housing land supply that a 20% buffer is required due to the Council's record of persistent delivery. On this basis, the Council considers that it currently has a 5.6 year housing land supply but this would fall to just 5.1 years if just 10% of units with existing permission do not come forward as planned. We consider this position to be marginal and the Council may need to consider more smaller allocations earlier in the plan period to bolster their current supply, as well as taking positive steps to support and facilitate the delivery of its proposed strategic allocations at the earliest opportunity.

Attached documents
Joanna Barfield

Section

Scale of Growth

Comment ID

307

Comment

Why are there so many empty properties in the area? Second / holiday homes that are rarely occupied. Southwold is almost completely dark in the winter months – on-one living there! This could solve the housing issue if this was no longer allowed.

Attached documents
John Lavery

Section | Scale of Growth

Comment ID | 336

Comment | Despite the information provided by Sam Hubbard regarding the rationale for the Local Plan I do not believe that most of it is needed or desirable for this area.

The whole plan should be reviewed in the light of Brexit and the inevitable (and wholly desirable) reduction of immigration into the UK and this area in particular.

This would mean that almost all the reduced growth required could (and should) be accommodated in Lowestoft with greatly reduced housing increases in the towns Beccles, Bungay, Halesworth, Reydon etc.. The only housing that should be permitted in these Smaller Towns and the Villages e.g Wangford, Rumburgh, Ringsfield, Westhall, Somerleyton etc. are: -

1.) affordable housing for the few local young families who already work in the area, or have local connections within them. and....

2.) Small units (flats?) for older people whose families have grown up.

Attached documents
Lound Parish Council John Burford

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Comment ID 1539

Comment The Waveney Local Plan seems to have an anomaly in its figures; North Lowestoft Garden Village is not part of Lowestoft but is located in the Parish of Corton. The percentage of housing allocation therefore does not correlate and is inconsistent with Corton being regarded as a rural area.

Attached documents
Lowestoft Town Council Shona Bendix

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<tr>
<td>Comment ID</td>
<td>1288</td>
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<tr>
<td>Comment</td>
<td>1.10 Strategic Housing Marketing Assessment ...905 additional care home spaces.</td>
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Lowestoft has a high proportion of elderly and disabled and the LTC feels this number is too low. Presently we have elderly residents who have difficulties finding local care home facilities and with an increasing aging population, this situation will only worsen. Our goal should be 900-1000 spaces in Lowestoft alone, not the entire district. "Care homes" in this context can be a combination of assisted living housing, sheltered housing and fully-staffed care homes.
Lowestoft Town Council Shona Bendix

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<tr>
<td>Comment ID</td>
<td>1295</td>
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<tr>
<td>Comment</td>
<td>1.16 ...In 5 years there is no need for non-food retail space... and more need for restaurants, gyms, leisure, cinema.</td>
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The LTC urges the WDC to prioritize large scale leisure facilities and convention space that will benefit both sectors (retail/leisure). A modern multi-plex cinema and supporting restaurants would benefit both local users and tourists. A large indoor open space (like a reconfigured Pavilion at Kirkley sea front) will enable the town to have indoor events and attract local tourists to festival or for meetings and conventions.

Identified gaps in the retail offer of Lowestoft town centre as follows:

- significant capacity for new town centre comparison goods (non-food) retailing;
- a need for a better balance of 'higher end' retailers;
- limited capacity for additional convenience (food) retailing;
- a need for an additional department store to anchor the town's retail offer;
- a need for a more flexible approach integrating the Heritage High Street and London Road North shopping areas;
- a need to boost the evening economy through considering more leisure activity within the centre, specifically with a modern multi-plex cinema.
- the need for a permanent and vibrant market stall area in the Triangle
- the need for a business rates system that reflects the takings of the business and not simply the square footage they occupy. The LTC advocates a system where new retail shops under the age of two years will have reduced business rates.
Attached documents
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section Scale of Growth

Comment ID 926

Comment Paragraph 1.7 (page 26) of the Plan, set out the approach to the District’s objectively assessed need (OAN). Of the 8,223 new homes over the plan period, equating to 374 per year, it is stated that ‘208 need to be affordable to meet local need. However, it is unlikely that this proportion of affordable housing could be viably delivered.’ In order to meet the OAN for affordable housing, the Council must allocate a higher number of houses. The NPPF, at paragraph 47, requires Local Planning Authorities to ‘set out a housing implementation strategy for the full range of housing’, including market and affordable housing. It is noted that at paragraph 1.9 the Plan sets out the intention to over-allocate housing, however, this is still insufficient to fully meet the affordable housing needed.

Attached documents
Mr & Mrs M J Venn

Section
Scale of Growth

Comment ID
360

Comment
9,000 new homes between 2014 & 2036 and you say "improve quality of life"! – with the clear possibility of 20,000+ more people in the Waveney District – we don’t think so. There is one glaring omission from your infrastructure – hospitals!

Attached documents
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<th>Nicky Elliott</th>
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R G Meadows & Son - Savills (UK) Ltd (Jonathan Dixon)

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<td>Comment ID</td>
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| Comment | We support the positive approach the Council has taken towards housing provision in the District, and in particular the identification of proposed housing targets as a minimum. Paragraph 47 of the NPPF seeks to boost significantly the supply of housing and thus it essential local plan policies seek to promote, rather than restrict, growth.

Provision for growth is particularly important given the significant investment in offshore wind in the North Sea off the East Anglian coast. On the 7th August 2017, development consent under Section 114 of the 2008 Planning Act was granted by the Secretary of State for the 'East Anglia Three Offshore Windfarm'. This, coupled with 'East Anglia One Offshore Windfarm' for which consent was granted in 2014, will result in significant investment in the area and create a large number of new jobs. Whilst not committed developments, it is important that the Council allow provision for further growth in this sector given the potential applications for 'East Anglia One North' and 'East Anglia Two'.

It is noted that Waveney has an acute affordable housing shortage. Consequently, it suggested that the Council consider a further uplift to the total number of new homes proposed, to take account of the high need for affordable homes.

We welcome the proposed distribution strategy, which seeks to allocate 55% of housing growth to the Lowestoft built-up area. As noted at paragraph 1.19 of the Local Plan, this strategy reflects the role Lowestoft plays as the largest and most sustainable town in the District and the economic role is has and will continue to play in the District.

Attached documents
Reydon Action Group for the Environment Stephen Chessher

Objectively Assessed Need and Housing Targets

I have two concerns over the Objectively Assessed Need (OAN) for homes as set out in the Strategic Housing Market Assessment Pt 1 May 2017.

Firstly, it is apparent from the Assessment that natural change is negative (ie death rates exceed birth rates) and that postulated population increase is due solely to inward migration. Although the Assessment notes the importance of migration from recent EU accession countries, it makes no attempt to consider the likely impact of Brexit on future migration from those countries. The likelihood is that such migration will reduce or even reverse but this likely reduction is not factored into the Assessment.

My second concern is that an adjustment was applied to exclude the effects of unattributable population change (UPC) which has most probably arisen because of previously under recorded migration. This results in a higher figure for OAN.

There is no logical reason for excluding UPC. The only justification given in the report (para 13.10) is: 'This approach of excluding UPC, and therefore adopting a higher demographic starting point, is taken in the spirit of positive planning'. So much for objective assessment.

With the UPC adjustment, the OAN is 8,223 dwellings (374 per year). Without the UPC adjustment, the OAN for Waveney would have been 7,065 dwellings over the Plan period 2014 – 2036 which I suggest would be a more appropriate figure.

WDC has then applied an uplift to the (already high) OAN in order to arrive at its target figure of 9,019 dwellings. The justification given at paragraph 1.9 of the draft Plan is to enable more affordable homes to be delivered and to provide confidence that the OAN will be met even if some allocated sites fail to come forward. However, this uplift ignores the inevitable further development that will take place on sites not identified in the plan.
('windfall sites') and also ignores the uplift already applied to the OAN that I have referred to above.

There appears to be no explanation of how the target of 9,019 dwellings was arrived at. The suspicion must be that it is simply the arithmetical total of those sites deemed suitable by WDC.

There also appears to be a logical fallacy in the assumption that increasing the target will increase the quantity of affordable housing delivered. The fallacy is that if the OAN is a correct assessment of future housing demand, there will be no demand for housing in excess of the OAN. If developers consider that there is insufficient demand, clearly they will not build.

In conclusion, I consider that the housing targets in the draft Plan are unsupportably high and should be reduced to no more than the OAN (noting that the OAN itself is high for the reasons referred to above).

Attached documents
Robert Gill

Section Scale of Growth

Comment ID 63

Comment The reasons for over-allocation of sites are understandable. However, the Plan fails to cover how 'cherry picking' by developers will be avoided - in other words selecting greenfield sites in rural areas, which are cheaper to develop, rather than focusing on the plentiful supply of brownfield sites. The final version of the Plan should address this issue.

Attached documents
Sally Anfilogoff

Section: Scale of Growth

Comment ID: 747

Comment: Chapter 1 Overall Spatial Strategy
Objectively Assessed Need and Housing Targets

I have two concerns over the Objectively Assessed Need (OAN) for homes as set out in the Strategic Housing Market Assessment Pt 1 May 2017.

Firstly, it is apparent from the Assessment that natural change is negative (i.e., death rates exceed birth rates) and that postulated population increase is due solely to inward migration. Although the Assessment notes the importance of migration from recent EU accession countries, it makes no attempt to consider the likely impact of Brexit (should it happen) on future migration from those countries. The likelihood is that such migration will reduce but this likely reduction is not factored into the Assessment.

My second concern is that an adjustment was applied to exclude the effects of unattributable population change (UPC) which has most probably arisen because of previously under-recorded migration. This results in a higher figure for OAN.

There is no logical reason for excluding UPC. The only justification given in the report (para 13.10) is: ‘This approach of excluding UPC, and therefore adopting a higher demographic starting point, is taken in the spirit of positive planning’. So much for objective assessment.

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WDC has then applied an uplift to the (already high) OAN in order to arrive at its target figure of 9,019 dwellings. The justification given at paragraph 1.9 of the draft Plan is to enable more affordable homes to be delivered and to provide confidence that the OAN will be met even if some allocated sites fail to come forward. However, this uplift ignores the inevitable further development that will take place on sites not identified in the plan ('windfall sites') and also ignores the uplift already applied to the OAN that I have referred to above.

There appears to be no explanation of how the target of 9,019 dwellings was arrived at. The suspicion must be that it is simply the arithmetical total of those sites deemed suitable by WDC which appears to be an unsafe methodology.

There also appears to be a logical fallacy in the assumption that increasing the target will increase the quantity of affordable housing delivered. The fallacy is that if the OAN is a correct assessment of future housing demand, there will be no demand for housing in excess of the OAN. If developers consider that there is insufficient demand, clearly they will not build.

In conclusion, I consider that the housing targets in the draft Plan are unnecessarily high and should be reduced to no more than the OAN (noting that the OAN itself is high for the reasons referred to above).

Attached documents
Sally Anfilogoff

Section Scale of Growth

Comment ID 748

Comment Distribution of Proposed New Housing

Figure 5 (p29) of the draft Plan shows distribution of new housing as follows:

55% Lowestoft and district;
15% Beccles and Worlingham;
8% Halesworth and Holton;
6% Bungay;
4% Southwold and Reydon; and
12% Rural area.

These percentages and hence the presentation of the Plan are misleading because they refer to percentages of the total of new housing. They do not refer to the percentage growth of existing settlements which would be a far more meaningful comparison.

Planned housing growth in Southwold and Reydon as a percentage of existing housing is in fact higher than in Lowestoft and district which is quite the reverse of the impression conveyed by the draft Plan. Given that no employment growth is planned for Southwold and Reydon this is insupportable.

The evidence base, that is the Strategic Housing Market Assessment, considers Waveney as a single Housing Market Area. No attempt is made to break it down into geographical sub-units. There is no evidence base for the distribution of new housing throughout Waveney.

No justification is provided for the allocation of 4% of growth to Southwold
and Reydon as opposed to 3% or some other figure, ie it appears to be arbitrary.

I conclude that the apportionment of 4% of planned housing growth to Southwold & Reydon is not supported by objective evidence and is too high.

Attached documents
Simon Clack

Section

Scale of Growth

Comment ID

1007

Comment

- the draft local plan plan appears to be based on "High growth Economic Projections" that reflect investment in the offshore wind sector, which is all well and good but: i/ surely it makes sense to have the new homes close to these new jobs, i.e. in Lowestoft; and ii/ it seems a little dangerous to base the projections for a whole region on a single sector;

-the plan appears to take no account of the impact of Brexit on the region: advocates of the UK’s departure from the EU suggest it should ease housing pressures;

Attached documents
**Simon Phillips**

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**Attached documents**
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

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2.5 At the previous Issues and Options stage the Somerleyton Estate supported Growth Option 3:

2.6 Growth Option 3 proposed to direct the largest proportion of housing to the sustainable rural settlements and the Somerleyton Estate considered this reflected Government policy and guidance on rural housing.

2.7 Paragraph 1.21 of the consultation document explains that:

"Importantly, the strategy reflects the need to support the numerous villages across Waveney. The strategy therefore allocates a more significant level of growth to villages than has been experienced in previous Local Plans. This reflects the fact that the sustainability circumstances of villages has changed with more people being able to work from home and using the internet for services such as shopping and banking. It also reflects the fact that without development, the population of villages will decline due to the trend of increasingly smaller households. More significant levels of development will allow people with a local connection or those who work in the rural areas to live in the rural areas. New housing should also help support existing services and facilities in the rural areas such as small rural schools and pubs and help extend super-fast broadband into these areas”.

2.8 The Somerleyton Estate supports the Location of Growth and Distribution of Housing as set out in this consultation because it echoes the Growth Option 3 which the Estate supported at the Issues and Options stage.

Attached documents
South Norfolk District Council Adam Nicholls

Section Scale of Growth

Comment ID 1587

Comment

- South Norfolk Council is pleased to see that Waveney is planning to meet their Objectively Assessed Need and support the fact that the proposed allocations exceed the minimum level of housing needed, as this builds an element of flexibility into the plan and will enable more affordable homes to be delivered to help meet local need identified in the SHMA.

- Para 1.10 refers to the fact that the SHMA also identifies a need for 905 additional spaces in care homes and nursing homes over the plan period. It would be useful if this section could explain a little more about how this requirement will be met through the plan e.g. as part of housing allocations or stand-alone sites allocated for care provision (recognising that some of the larger allocations include a requirement to deliver care homes).

- South Norfolk Council is pleased to see that employment allocations have been made to meet, and indeed slightly exceed, projected demand to allow for the fact that some land will not be developed during the lifetime of the plan. However, this is a careful balancing act to ensure that the plan does not significantly over allocate employment land which has no likelihood of coming forward as this could increase pressure for this land to be released for residential development at a later point.

- In general, South Norfolk Council supports the overall distribution of growth understanding the need to direct the majority of growth to Lowestoft to reflect its role as the largest town in the district and to capitalise on its regeneration and future economic growth potential.

South Norfolk supports the level of growth proposed in Beccles and Worlingham reflecting its role as the second largest built up area in the district and the fact that it acts as a service centre for the surrounding rural community, including settlements in South Norfolk. The two councils will need to continue to work together, alongside the two county councils, to ensure that the transport impacts of growth (especially on the A143 and A146) are properly assessed and planned for, as there will also be growth in...
South Norfolk adding pressure to these roads.

South Norfolk is also pleased to see an element of growth proposed in Bungay, again reflecting its role as a service centre for the surrounding rural population, including settlements in South Norfolk. We are also in favour of the strategy to support villages in Waveney with a greater level of growth than has been experienced in previous plans, although it will be important to ensure this is balanced with economic growth and the provision of improved broadband to facilitate working from home and the use of internet for services such as shopping and banking.

Attached documents
Southwold and Reydon Society Philip O'Hear

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**Comment ID**

1172

**Comment**

We recognise the rationale behind the overall District target of 9091 new homes but feel that this should be seen as an absolute upper limit, given the uncertainties and assumptions that are involved in calculating this figure. Above all, we should not build homes for an increased population unless we are sure that the local economy will sustain the employment these new residents will need.

**Attached documents**
Suffolk County Council Robert Feakes

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The distribution of homes and jobs, focusing on Lowestoft and the larger settlements, appears appropriate in respect of coordinating the distribution of new homes and new employment.

Highway Impacts

The County and District Councils have collaborated on the development of evidence to underpin the Local Plan, jointly commissioning WSP to publish the Suffolk County Transport Model (SCTM) Forecast Model Report.

This study models the impacts of the proposed level of development by 2036. It suggests additional delays in 2036 compared to 2016, as a result of development, including on the A1117, A12 and A146. It models the specific impacts on junctions in the District, with the Lake Lothing Third Crossing included within the assumptions.

Modelling suggests no significant congestion issues arising as a result of the development proposed in the Plan at junctions in Bungay, Halesworth, Southwold or Reydon. South Lowestoft has a number of junctions showing significant congestion by 2036 if not mitigation is provided, including:

- B1532 London Road South / Mill Road
- A146 Beccles Road / Hollow Grove Way
- Tower Road / Cooke Road
- A12 Tom Crisp Way / Blackheath Road
- A146 Bridge Road / Cotmer Road
- A1117 Bridge Road / Bridge Road

In particular, the Bloodmoor Roundabout shows stress with multiple
approaches modelled as exceeding capacity if mitigation is not provided. This would result in additional queuing, with potential adverse environmental impacts.

Although highways mitigation will be necessary as development comes forward, the evidence suggests that the District’s proposed spatial strategy is deliverable if mitigation is provided.

Before the Regulation 19 Submission Version of the Plan is published, the WSP study recommends that:

- As other neighbouring local plans come forward, carry out further assessment to enable joint planning and identification of mitigation measures.

- Consider assessing the impacts of specific sites in order to identify in more detail the mitigation which will be required in order to mitigate site impacts.

The County Council will continue to support and advise the District in respect of these recommendations.

Attached documents
Watts

Section       Scale of Growth

Comment ID   229

Comment       With regards to point 1.7 9 (and in relation to a previous comment that I have made), I am very concerned that the Strategic House Market Assessment was based upon trends over the period 2010-2015 when there was very high net migration into the country. I think it is essential that some allowance must be made for likely future trends i.e. a large reduction in net migration because of Brexit.

Please can you confirm if the population effects of Brexit have been totally ignored in the calculation for both housing and employment needs. If so, this seems like an appallingly short-sighted assessment of building development needs for the next 20 years.

I think a flexible 'range' of housing requirements would be better - say 5000 to 10000 new houses between 2014-2036, with re-assessments every few years based upon population trends for the District.

Attached documents
Policy WLP1.1 - Scale and Location of Growth

Andrew Stewart

Section  Policy WLP1.1 - Scale and Location of Growth

Comment ID  836

Comment  More growth should be focussed on Lowestoft. High unemployment there and the social issues referred to mean that it is most in need of the focus of the Council’s efforts. Existing market towns can only accommodate growth with appropriate employment opportunities and it is not obvious where those will come from, the towns appear to be sustainable on their current basis with some issues but not to the extent identified in Lowestoft. Rural development should be minimised and appears largely unnecessary.

Attached documents
Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 594

Comment The built up area of Beccles and Worlingham is much larger than Halesworth or Bungay. The plan proposed proportionately similar levels of development in these areas.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section  Policy WLP1.1 - Scale and Location of Growth

Comment ID  1440

Comment  Whilst we welcome the wider spread of housing and the additional allocations, we continue to have concerns about the deliverability of some of the existing allocations and the "drag" this will have on the availability of new dwellings in the town. Whilst the nominal availability of sites demonstrates a five year land supply on paper, their lack of availability on the ground is holding back delivery to an unacceptable extent.

To maintain delivery the Council will need to play a more active role in helping sites come forward and be prepared to take a more proactive role in the more favourable determination of some speculative applications, which are able to bring delivery forward in place of those which resolutely refuse to happen!

Attached documents
Beccles Town Council C Boyne

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1146

Comment Firstly, although council reluctantly accepts the proposed number of new dwellings, the number of new residents that these dwellings will inevitably generate is significant and the town will need to be able to accommodate this increase. Policies will therefore need to be strengthened and made more robust to ensure that the proper infrastructure is in place to support this demand. Beccles is already suffering from a lack of proper infrastructure, in particular in relation to leisure facilities, and would require more than the proposed 15% increase in leisure facilities, which is currently based on the proposed 15% growth in dwellings.

Attached documents
Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1120

Comment Support is given to the positive approach the Council has taken to housing provision in the District as expressed within the Policy. The proposed allocations for housing in the Local Plan are expressed as minimum levels and reflect in part the need for further detailed analysis to be undertaken for every defined housing allocation since it remains impossible to define exact housing numbers until details have been explored.

It is noted that of the proposed strategic distribution of growth throughout the District, approximately 12% of new housing development is directed towards the rural area which can support growth of existing key services as they become equally reliant on the influx of new residents to support and sustain local neighbourhood facilities. The amount of development being focussed on villages is greater than in previous years and this reflects the fact that societal changes have affected the sustainability credentials of many of the smaller settlements— the use of the internet allowing for home—working and internet shopping are 2 changes that have occurred and in situations where there is a real danger of villages beginning to atrophy, it is entirely appropriate that a spatial strategy should seek to address such an issue by directing growth to such locations.

Attached documents
Broads Authority Natalie Beal

Section  Policy WLP1.1 - Scale and Location of Growth

Comment ID  465

Comment  Table 1, second line, ) missing.

Attached documents
Christchurch Land & Estates (Halesworth) Limited -
Richard Brown Planning Limited (Richard Brown)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1418

Comment Strategic Policies

The draft Waveney Local Plan sets out draft policies to assist in directing growth and development through the plan period. Policy WLP1.1 sets out that the plan will allocate land for a minimum of 8,223 dwellings to come forward by 2036. It goes on to identify that Halesworth and Holton will house 8% of the housing growth. The 'key diagram' categorises Halesworth and Holton as a market town. The allocation of Halesworth and Holton as a market town is welcomed and considered suitable given the level of services and facilities available. These services and the town's transport connections make it an appropriate, sustainable location to target for growth.

Attached documents
Clare Mackney

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 733

Comment The Plan appears to significantly over-allocate land for new housing. The District-wide figure of 9,019 houses over the Plan period 20014-36 is well into the highest growth scenario (9,525 houses) considered in the June 2016 'Options for the new Waveney Local Plan' consultation document and supporting text should make this clear. While this growth rate may be comparable with that over the last 20 years, as the Plan states, it is certainly a great deal higher than, say, the last decade.

I accept that the District's provision starts from its consultant's 'Objectively Assessed Need' figure of 8,223 new houses but strongly question the additional 796 added in the Plan, justified by the District on the grounds that it will help provide more affordable homes and guard against under-provision on allocated sites. The fact that there are already 2,603 houses with planning permission in the system and that the consultants concluded there was no evidence of a under-supplied market suggests there are no grounds for the latter justification.

In terms of affordable homes, although the consultants identified a 'need' for 208 affordable homes per year this is a theoretical/potential figure, not an achievable goal. While government allows for discretionary increases in housing land provision for affordable homes the fact that the consultants found that house price increases, rents and overcrowding in Waveney were all below national and county averages, strongly suggests that provision of additional land is not the answer to this issue.

In addition, the Plan figures make no provision for windfall sites even though the District’s own Strategic Housing and Employment Land Availability Assessment Land Availability Report forecasts that 920 houses will be delivered by such sites from 2019-36. Added to the Plan figure of 9019, this gives a total figure for new housing of 9,939, which considerably exceeds the upper limit of the Scenario 3 figure referred to above. The public have not been consulted on this scale of growth, which clearly has potentially adverse implications for infrastructure, impact on existing
residents, and the character of the whole District.

Attached documents
Education and Skills Funding Agency Douglas McNab

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 794

Comment The ESFA notes that significant growth in housing stock is expected in the district; the Local Plan confirms the annual housing target of 374 homes to the end of the plan period in 2036 (8,223 dwellings in total; Policy WLP1.1). This will place significant pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.

Attached documents
Forcecore Limited (Wheatman Planning Ltd) A Darling
Wheatman Planning Ltd. (Deirdre Linehan)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1535

Comment Scale of growth

Further to comments made under "Overall Spatial Strategy" we do not consider that the proposed housing allocations within the First Draft Plan will enable the District Council to meet their identified housing needs over the plan period. It has been several years since the annual housing target, identified within the existing Local Plan as 290 dwellings per year, has been met. Paragraph 1.3 of this section "Scale and location of growth" states that more people are moving into the District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth therefore the demand for housing is growing. It is acknowledged therefore that there is potential for a real "supply v demand" issue to develop if identified needs aren't met pushing house prices up and making it more difficult for young people to get on the housing ladder. It also places the Council at risk of facing development proposals in inappropriate locations through lack of a five year housing land supply.

Despite these issues being clearly identified within the First Draft Plan it is considered the approach proposed by the Council for housing development is significantly flawed. Over-reliance is being placed on large allocations to contribute to the housing need and there are insufficient medium and small scale allocations that are likely to come forward and deliver housing more quickly and make reliable contributions towards resolving some of the annual housing need that has been identified as 374 dwellings per year in the First Draft Plan.

Location of growth

The First Draft Plan proposes that 55% of new growth or 4991 dwellings will be built in Lowestoft (includes Carlton Colville, Oulton and Oulton Broad) between 2014 and 2036. This includes the two large allocations referred to
above which when fully developed are expected to deliver a combined total of approximately 2200 dwellings. The site in North Lowestoft however is only expected to deliver just over half of its housing allocation during the Local Plan period, approx 760 dwellings. The combined total expected to be delivered by the two sites during the plan period therefore is 1560 dwellings or approximately 31% of the total housing requirement for Lowestoft. We consider this expectation to be overly optimistic with over reliance being placed on these two sites, that are not without considerable constraints, to deliver almost a third of the total housing requirement for Lowestoft during the new local plan period.

Historically large sites generally have not proved a successful option in terms of housing delivery and this is particularly true in Lowestoft. There are several examples to back up this argument including the Woods Meadow site which was originally allocated for development in the 1996 Waveney Local Plan but only started delivering houses during 2015. A multitude of issues involved complex relationships between various developers related to upfront infrastructure delivery resulted in lengthy delays to the commencement of development of this site. This was not aided by fluctuations in the housing market affecting developer confidence on a major site.

A number of other large allocations within the existing local plan display a similar pattern including Kirkley Waterfront (SSP3) which includes the old Sanyo Site (approximately 350 dw) and Brooke Peninsula and Jen Weld Site (850 dw). None of these sites have yet delivered any dwellings despite predictions from WDC going back several years that the development of these sites was imminent. It is acknowledged that these latter sites are brownfield development which can often pose additional issues and constraints that are difficult to overcome. Notwithstanding this however it can still be questioned whether it is wise of the District Council moving forward to continue to place reliance on large allocations to meet their housing needs when there are smaller and more easily developed sites in equally if not more suitable locations such as the land at Gunton Avenue put forward by our client. We will expand further on the benefits of including our client’s site as a residential allocation in our response to "The Alternative sites considered".
**G Youlden**  
Wheatman Planning Ltd. (Deirdre Linehan)

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Despite these issues being clearly identified within the First Draft Plan it is considered the approach proposed by the Council for housing development is significantly flawed. Over-reliance is being placed on large allocations to contribute to the housing need and there are insufficient medium and small scale allocations that are likely to come forward and deliver housing more quickly and make reliable contributions towards resolving some of the annual housing need that has been identified as 374 dwellings per year in the First Draft Plan.

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Historically large sites generally have not proved a successful option in terms of housing delivery and this is particularly true in Lowestoft. There are several examples to back up this argument including the Woods Meadow site which was originally allocated for development in the 1996 Waveney Local Plan but only started delivering houses during 2015. A multitude of issues involved complex relationships between various developers related to upfront infrastructure delivery resulted in lengthy delays to the commencement of development of this site. This was not aided by fluctuations in the housing market affecting developer confidence on a major site.

A number of other large allocations within the existing local plan display a similar pattern including Kirkley Waterfront (SSP3) which includes the old Sanyo Site (approximately 350 dw) and Brooke Peninsula and Jen Weld Site (850 dw). None of these sites have yet delivered any dwellings despite predictions from WDC going back several years that the development of these sites was imminent. It is acknowledged that these latter sites are brownfield development which can often pose additional issues and constraints that are difficult to overcome. Notwithstanding this however it can still be questioned whether it is wise of the District Council moving forward to continue to place reliance on large allocations to meet their housing needs when there are smaller and more easily developed sites in equally if not more suitable locations such as the land east of Parkhill put forward by our client. We will expand further on the benefits of including our client’s site as a residential allocation in the section below, "Alternative site for considered".

Attached documents
Comment ID 946

Comment

It is noted that Policy 1 indicates that the Council will make provision for the delivery of a minimum of 8,223 dwellings in Waveney. Whilst the minimum requirement is likely to be the subject of further scrutiny as the local plan is developed and its evidence base refined, it is essential that sufficient land is identified through allocations within the pre-submission version of the Plan to secure the delivery of objectively assessed needs for market and affordable housing in full over the plan period whilst maintaining a robust rolling five year housing land supply. With this in mind, we note that the Council recognises the need to exceed the minimum level of housing needed through its local plan allocations4. Gladman consider it essential for local plans to provide sufficient flexibility by identifying land for the delivery of housing that is 20% above the minimum requirement. This headroom is necessary for local planning authorities to successfully demonstrate that it is proposing a robust strategy that genuinely enables overall plan targets to be met.

In this regard, Gladman would wish to highlight the presentation given by the Director of Planning at DCLG at the Home Builders Federation Planning Conference in Figure 1 below shows that 10-20% of permissions do not materialise into a start on site and that the permission 'drops out'. It provides multiple reasons for this occurring and highlights a clear need to plan for the granting of permissions on more units than are required to be completed to meet housing needs. In this regard, it is recommended that the allocations within the Plan provide a clear 20% contingency in order to increase the prospect of the minimum requirement being achieved over the plan period.

4 Local Plan First Draft, Paragraph 1.9

Figure 1 – Home Builders Federation Slide:-

In addition, a contingency is required to effectively plan for circumstances where large scale strategic sites do not deliver housing at the rate that is
initially anticipated during the production of the There have been a number of circumstances where strategic sites within local plans have delivered at a lesser rate than initially expected at the time of adoption (even after the careful consideration of supporting evidence relating to infrastructure and viability). This can be as a result of a variety of reasons, such as: lengthy determination periods for outline and reserved matters planning applications; significant upfront infrastructure costs and associated viability assessments; the requirement for site remediation on previously developed land; onerous planning conditions; complex s106 agreements and off site infrastructure delivery; and, complex land ownership arrangements. Whilst strategic scale sites can certainly play an important role in delivering housing of the scale that it is required to meet the required needs, this should be supplemented by an appropriate range of small and medium sized sites in sustainable locations across the settlement hierarchy.

Gladman would also highlight the findings in the Inspector’s report into the Stratford-on-Avon Core Strategy, published in June In that Report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF, the 10% reserve for housing sites should be increased to 20%. Similarly, the emerging plan for Redcar and Cleveland, published in May 2016, at policy H1 seeks to identify a buffer of around 20% additional housing land on top of the net minimum requirement in order to:

"promote a continuous supply of housing land in line with national policy, and to reduce the risk of under-delivery..."

Policy 1 also seeks to establish a strategy for the spatial distribution of growth across specific settlements and the district’s rural area. It is noted that the percentages are said to be approximate, however it is vital that any such approach does not preclude the sustainable growth of settlements across the hierarchy. It should also not become a mechanism for the arbitrary restriction of growth as to do so would reduce the ability of the Plan to respond to rapidly to changes in circumstance and is unlikely to be considered sound if progressed within later iteration of the Plan.

In allocating sites, the Council should be mindful that to maximize housing supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available
to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and It is essential, therefore, that the needs of the sustainable rural settlements across the county are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.

Gladman consider that the level of development allocated to villages should be a meaningful contribution to ensure the ongoing overall vitality and viability of the rural settlements as required by paragraph 55 of the Framework. The level of growth aimed towards sustainable rural settlements should therefore be sufficient to ensure that the housing needs of the rural population of the district can be addressed.

The Government’s plan for rural areas set out in the 'Towards a one nation economy: A 10-point plan for boosting productivity in rural areas' document highlights, that a lack of housing is a national challenge but in rural areas it is a particular constraint to labour and entrepreneurial mobility, with the stock of housing limited relative to demand and higher average house prices than in urban This is further evidence of the Government’s will to increase rural housing availability through new development so as not to stifle rural economic growth.

If the underlying principles of the strategy remain the need to manage future development to ensure that communities have an appropriate balance of jobs, services and facilities and homes, then its policies must become a mechanism by which a settlement that is assumed to function at a lower level within the hierarchy can migrate up the sustainability ladder.

Attached documents
Historic England

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1371

Comment We welcome that you have undertaken a Settlement Fringe Landscape Sensitivity Study as part of the evidence base to the local plan. However, we would note that on individual site allocations the findings of the study do not concur with the heritage assessment of landscape, particularly at Carlton Colville. We also welcome the commitment in the Strategic Housing and Employment Land Availability Assessment (July 2017) that all sites assessed at stage 2 will have a site visit in response to our advice about appropriate assessment of historic environment impacts. However, we note that in individual allocations historic environment issues have not always been identified in the document, for example the scheduled monument at Carlton Colville.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1459

Comment Scale and Location of Growth – Object

Our concerns regarding the proposed distribution of growth in the First Draft Plan are three-fold. These concerns are summarised below and discussed in more detail in the following sections:

* The plan proposes 55% of all development (4,991 new homes) in and around We consider this strategy to be overly optimistic, unrealistic and undeliverable during the plan period.

* The plan proposes to allocate a significant level of growth to Rural Areas at 12% (963 new homes). We consider that this would result in an unsustainable pattern of development that would promote a reliance on travel by private car and would result in significant levels of growth in small villages that would have a disproportionate impact on the character of the Rural

* The plan fails to allocate enough development to Halesworth and Holton at just 8% (740 new homes). In the context of the above outlined concerns regarding the deliverability of development in Lowestoft and the sustainability of development in the Rural Areas, it is clear that more development will need to be directed to the market towns and in particular Halesworth where there is both adequate demand to ensure deliverability and sufficient services and public transport connections to create a sustainable pattern of development.

Attached documents
James Servaes

Section  Policy WLP1.1 - Scale and Location of Growth

Comment ID  50

Comment  The use of BROWNFIELD SITES for employment development areas is mentioned in the narrative but not in the policy. Is this correct?

Attached documents
Jeffrey Harris

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 515

Comment I listened to you and your colleague provide an excellent outline of the Local Plan at Beccles on 29th August. I was impressed by your enthusiasm and at your freshness of approach. However having worked in Lowestoft for 17 years and lived in central Beccles for 33 years I see the plan from a different angle. Lowestoft is a sad joke (even with the long overdue third crossing) - few entrepreneurs would bring their industry there. The four market towns were not designed for the pressures of the 21st century and are already choked with traffic. It is overtime for planners to think afresh and fortunately you appear young enough not to be stuck in any particular frame of mind. Many national leaders - politicians and indeed Prince Charles, have highlighted the advantages of NEW TOWNS! It is time to move away from adding to the misery of old unsuitable settlements and plan not for 20, not for 50 but for 100 years ahead. There are many wonderfully talented young town planners, who think ahead and see the advantages to all of a NEW TOWN. That is my advice, think afresh and think of future generations!

Attached documents
John Clark

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 119

Comment With ref to your 12 page supplement in the local weekly Advertiser Friday 4th August 2017 regarding the future of our towns, villages and countryside for consultation ends 22 September 2014 of which I have read and totally agree, that there must be another 12 to 14 thousand new houses to be built in and around the Waveney district.

Also surely the Waveney Council have or possibly have a load of old council houses that have been boarded up etc that needs to be renovated or repaired and updated, that would or could be used by family's etc.

What about the very old factories along Victoria Road and Waveney Drive, that have been stood there for more years than enough with there roofs and walls all off, which could be turned into a housing estate etc, also there is some scrap land opposite your Council yard in Denmark Way, which could have approx 20 houses and flats built there.

Attached documents
Larkfleet Homes - Seth Williams

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1478

Comment These representations are supported by a Review of the Objectively Assessed Housing Need of Waveney District prepared by SPRU which draws the following conclusions in respect of the scale of growth planned for in the Draft Local Plan:

* SPRU consider that the HMA for Waveney District is not justified and it should be included within a HMA with Great Yarmouth, which is clearly supported by the evidence.

* The starting point for calculating OAN is the most recent (2014-based) Government The SHMA 2017 uses this evidence. However, the most recent 2016 MYE data should also be considered.

* The use of 5-year migration trends is not adequately justified, it is considered that a longer-term trend (of at least 10 years) would more appropriately reflect the migration trends of the The 5-year trend is focused on a post recessionary period which, from the SHMA's own evidence, Waveney is yet to fully recover from.

* The decision to not make adjustments to household formation rates is not at all clearly set out within the main report, or Appendix B.

* The application of a 0% market signals uplift is not at all reasonable, based upon the evidence put forward in the 2017 SHMA.

* SPRU suggest that the 2017 SHMA should not be considered to be robust for plan making purposes and should be updated with the most up to date information, reflect upon long term trends and the need to consider these and finally re-examine clearly worsening signals of housing affordability across the HMA.

These conclusions are to be considered against the overall growth
In terms of the strategy for the location of growth, we welcome the Council’s decision to adopt a strategy which sees a proportion of growth being directed to the market towns and rural areas. However, as previously advocated, we consider that a greater proportion of growth to these areas (in the order of 25-35%) would in fact have a greater positive impact. The reasons for this greater positive impact is that, when assessed against several of the Council’s Sustainability Appraisal (SA) objectives, it is the most likely scenario to ensure that the OAN is met in full; alongside a greater chance of meeting affordable housing needs.

The SA identifies that Beccles has a good range of services and facilities and that development of scale may help provide additional services and facilities to the benefit of the Also, growth in Beccles would benefit from the services and facilities it offers by enabling future residents to walk and cycle to access services and jobs which would enhance the health and wellbeing of the population through encouraging more active lifestyles. The SA further identifies that there is strong market demand in Beccles with higher prices than Lowestoft, which may provide more scope to secure affordable housing. The split of development between Beccles and Lowestoft would also provide greater certainty that objectively assessed needs could realistically be delivered.

Furthermore, the SA notes that environmental impacts of a greater proportion of growth at market towns would be preferable to other options in that some of the landscapes around Lowestoft are particularly sensitive to development such that reducing the level of development towards Lowestoft would ease pressures on these landscapes whilst a more significant level of growth at Beccles would be unlikely to have such a significant effect on the Similarly, the SA notes that with more significant levels of growth in Beccles it might be that development in south Lowestoft could be avoided. This would also be beneficial in terms of conserving biodiversity and geodiversity given the sensitivity of south Lowestoft.

Demand for employment growth would also be likely to increase with increased housing supply in Beccles to complement and support Growth in Beccles could sustain, and be sustained by, employment growth at the Ellough Business Park and Enterprise Zone. In terms of the rural economy, the SA does acknowledge that a greater proportion of growth in the market towns would present a benefit to the rural area and we would endorse this on the basis that growth in Beccles would enable the town to better serve
the surrounding rural area.

Furthermore, in terms of the town centre, a more significant level of growth at Beccles also provides an opportunity to enhance the viability and vitality of the town centre by increasing the local customer base and resultant footfall and consumer spend in the town. New development can support the economic vitality and viability of market town centres. Whilst the argument that Lowestoft has seen increase in retail unit vacancies is made, the recent trend for this has shown a sharp decrease. Whereas in the market towns, the vacancy rate increased sharply after 2006 and since then has fluctuated and not fallen to previous lower levels.

In light of the above, we would advocate a strategy which delivers a greater proportion of growth to the market towns and rural areas as the most beneficial development strategy of those proposed.

Leonard Coote

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 516

Comment 1) Although the percentages for growth in each of the areas are explained in "Frequently Asked Questions", they still appear to be arbitrary and "preference Engineering based"!

I have not seen a justification for the decision to reject Option 1 of ( ie Continue to focus growth on Lowestoft) rather than the latest proposal.

Under the original Option 1, the distribution proposed was:- Lowestoft 75%, Beccles 10%, Bungay 2%, Halesworth 5%, Southwold 3% and other Rural 5%.

With respect to the above, I would like to make 3 points:-

* a) Bungay is generally considered by local people to be 'dying on its feet' compared with Beccles....perhaps too strong an analogy.....but....in would surely benefit from a 'shot in the arm' that an increased population would bring about?

* b) There is a well held suspicion that Bungay and Southwold are getting away 'lightly' with 2% and 3% respectively and that they could shoulder more of the burden. Although you may claim that these percentages are supported by the logistics studies you have carried out,some believe that other influences are behind the proposals.

* c) My proposal would therefore be to modify the original Option 1 to create a fairer distribution and lessen the impact on Beccles viz:-

- Even out the 10% Beccles and 2% Bungay to ....6% EACH.

This would be a much more equitable solution. Beccles is a fine market town with a pretty optimal population. The latest proposals for growth would do much damage to it.

2) Finally, I would like to see preference to LOCAL builders who would expand the housing stock as required and NOT a development company
seeking to make quick profits then cut and run.

Your FAQ’s make the point that people will want to migrate to this area and that we need to increase the housing stock otherwise house prices will rise and local people will be ‘priced out of the market’. We should give preference to those families and their children on the town electoral roll with affordable houses if they need it.

Otherwise, it will not matter HOW MANY houses are built in Beccles, people will still be drawn here as it is a very desirable place to live. 'If you build the houses....they will come!' Because of this demand, the local families will still be priced out....unless you change the model.

Hopefully you will give some consideration to my points above. Too many bad or hasty Planning Decisions have been made in the past which have blighted communities further down the road.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1289

Comment Policy WLP1.1 Lowestoft (including CC, Corton, Oulton, OB, Gisleham) 55% housing growth.

This is 4,523 new houses, but apart from the housing noted in the Kirkley Waterfront and the garden estate in Gunton, plan doesn’t say which town those houses are going in. The LTC makes clear that Lowestoft should not bear the brunt of increased housing to protect outlying rural areas. Since we are bordered on all sides by obstacles to expansion and other towns, our housing expansion will need to be internal and on brownfield areas, which are limited by their very nature. Most of the brownfield sites designated in the plan in the LTC boundaries as suitable for housing are in a level 2 and 3 flood zone. Because of these limitations, the LTC notes that many of the 4,523 new dwellings will need to be in other areas that have the capacity to hold them and that the plan needs to be more specific about the location of development.

The LTC is committed to promoting sustainable, dignified housing for all of our citizens. Such housing must have appropriate infrastructure, schools, green spaces, medical facilities and access to transportation. The use of brownfields and the redeployment of buildings to residential use is encouraged, as long as the wider issues are not ignored, such maintaining areas for business, light manufacturing and tourism and the safety issues that come from building on flood zones and low lying areas, as well as traffic congestion and other quality of life issues.

Attached documents
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 927

Comment In order to deliver 55% of the housing needed in and around Lowestoft, totaling 4991 dwellings, the Council will need to ensure that there is a higher proportion of small to medium sites that can be delivered quickly if it is to meet its objectively assessed housing need.

Policy WLP1.1. is unclear about the status of Corton. It is both included in figures for Lowestoft but is identified as being a rural area. As a consequence, it is unclear whether it is included as part of the 55% of housing allocated to Lowestoft or the 12% to rural areas.

Attached documents
Mr & Mrs T Lawrence

Section  
Policy WLP1.1 - Scale and Location of Growth

Comment ID  
649

Comment  
We do not consider Lowestoft should accommodate the majority of the Districts development of 4991(approx. 5000) new homes. Beccles and Worlingham has many larger alternative sites and there are only 1473(approx. 1500) proposed new homes. Also Halesworth and Holton have large alternative sites and only 740 new homes are proposed. The alternative sites should be given further consideration as some of the reasons given could also be used on the chosen sites.

Attached documents
Norman Castleton

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 192

Comment Scale & Location of Growth

The number of houses allocated for Lowestoft plus Beccles & Worlingham is plainly ridiculous. The economy is either area is not growing significantly enough if at all. The support services for all these areas are in regression including the NHS & education. The utilities will not stand much more building expansion e.g. sewers & waste removal, electricity, broadband and perhaps most importantly water. These numbers should be rethought else there are going to environmental and service shortfall consequences. What will happen if the population falls which probably very likely post Brexit?

Attached documents
Norman Castleton

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 194

Comment Scale & location of growth

These housing growth figures are far too high. The area cannot support the housing & accommodation it already has. There is no mention here of the services and other economic growth that needs to accompany extra housing. These vital issues including not least meaningful jobs are in decline as described in the preamble to this plan. There is also the environmental issue. Councils like governments cannot go on paying homage to the god of growth and ignoring the drastic effects on the environment. Temperatures are reaching crises levels and are probably past the tipping point now and to go on using up valuable farm land, green fields to the detriment of flora and fauna, extra pressures on water tables will only bring the end for this area as a viable living space far more quickly. Most of the new housing being built is of a poor standard and environmentally unsound. Far better to get the existing housing stock up to standard, get people out of their cars. encourage alternatives and bring in far better public transport systems. According to a EDP Study of 29th August 2017 page 6, there are 1,512 houses standing empty in Waveney (10,647 in Norfolk) with nearly half of these being empty for six months or more. Waveney do not take the enforcement action that they should. The work sustainability is used pretty liberally throughout this proposed plan but personally I would like to see far more realistic evidence that it is an important part of thinking that has gone into the plan.

Attached documents
P Mounser

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 525

Comment Many houses are being probably built in the foreseeable future – where is the employment coming from for these, who either live here, for youngsters coming onto the employment market? The east coast isn’t a viable area for fledgling firms. The only probably growth area is the "care" employment. Globally, it is said the wind turbine etc is a growth industry – which it probably is – harnessing the waves could be a growing concern but that, I assume, could be harnessed anywhere along the coast.

The fact that the sea erosion is on-going as predicted by some, East Anglia will be encroached upon but by how far? Why build so close to the coast – why build where it will probably happen. (I assume these houses are not built to last two to three hundred years). It just seems common sense that we should all gradually be moving inland.

Attached documents
Redisham Parish Meeting Michael Parry

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<tr>
<th>Section</th>
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Reydon Action Group for the Environment Stephen Chessher

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1241

Comment Distribution of Proposed New Housing

Figure 5 (p29) of the draft Plan shows distribution of new housing as follows:

- 55% Lowestoft and district;
- 15% Beccles and Worlingham;
- 8% Halesworth and Holton;
- 6% Bungay;
- 4% Southwold and Reydon; and
- 12% Rural area.

These percentages and hence the presentation of the Plan are misleading because they refer to percentages of the total of new housing. They do not refer to the percentage growth of existing settlements which would be a far more meaningful comparison.

Planned housing growth in Southwold and Reydon as a percentage of existing housing is in fact higher than in Lowestoft and district which is quite the reverse of the impression conveyed by the draft Plan. Given that no employment growth is planned for Southwold and Reydon this is insupportable.

The evidence base, that is the Strategic Housing Market Assessment, considers Waveney as a single Housing Market Area. No attempt is made to break it down into geographical sub-units. There is no evidence base for the distribution of new housing throughout Waveney.

No justification is provided for the allocation of 4% of growth to Southwold and Reydon as opposed to 3% or some other figure, ie it appears to be
I conclude that the apportionment of 4% of planned housing growth to Southwold & Reydon is not supported by objective evidence and is too high.

Attached documents
Comment ID 1325

Comment

In terms of the scale and location of development, we support policy WLP1.1 insofar as its housing targets are expressed as a minimum to provide flexibility and certainty of delivery. The Council will no doubt be aware of the consultation on the Government's standardised methodology for assessing housing need, and should be aware of the transitional arrangements as it progresses toward the Submission of the Plan. The principles behind the standardised methodology will be material considerations in the discussions had regarding OAN as the Local Plan progresses.

We also support the identification of Halesworth as a market town and the focus for sustainable development.

Notwithstanding the above, we do have concern that there is an over-reliance on Lowestoft delivering a large percentage of the intended housing growth for the District (55% of the new growth). Clearly, being the largest settlement in the District, with its associated services and infrastructure, Lowestoft will have a leading role in delivering growth. Brownfield sites in the centre of the town appear to have been re-allocated when historically these sites have not previously delivered housing, even in arguably a better economic climate. Inevitably, this raises concerns about the deliverability of these proposed allocations.

Further, the District Council propose a Garden Village (Policy WLP.2.12) to the north of Lowestoft where there appears to be little or no services to build on to instigate a new settlement. As such we would anticipate that the Council – in advancing a robust Plan - will allow for significant lead-in times whilst infrastructure funding and provision is arranged.

In our view, Halesworth needs to be considered in terms of a market town that does not simply serve Waveney but also serves a significant area within...
the neighbouring Suffolk Coastal District. Given that the two Councils are to merge into one East Suffolk Council, it would be reasonable to assume that growth in Halesworth could assist in addressing deficiencies within Suffolk Coastal District (which currently has no five-year housing land supply). Whilst we support the allocation of land at Harrisons Lane, it is our opinion that further development could sustainably be directed to Halesworth to help underpin the existing facilities and services it currently enjoys.

Attached documents
Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1323

Comment

It is clear that the District requires a new Local Plan, given that the existing Core Strategy was adopted in 2009 – and thus does not accord with the aspirations of the NPPF, and we acknowledge the reasoning behind it being brought forward. The economics of delivering sustainable growth coupled with the impact of new planning legislation are clear drivers for putting in place a more up-to-date plan that recognises the full objectively assessed needs of the District. In broad terms, we agree that the delivery of growth will need to occur in established settlements where existing services exist or can be expanded to accommodate proposals for delivering housing, employment, retail and other uses. The hierarchy of settlements has been in place through previous Plans and most growth will need to occur via this existing structure.

We support the overarching vision (page 22) of the draft Local Plan, with particular reference to the need to sustainably improve the quality of life for everyone living in, working in or visiting Waveney.

The desire to secure a healthy economy, a healthy population and a healthy environment are central to the promotion of land at Harrisons Lane as part of the 'Healthy Neighbourhood' proposals; which is a unique opportunity to secure a range of community uses alongside much needed housing growth close to the town centre and existing transport hubs.

We acknowledge and support the role of Waveney’s town centres, including Halesworth, as the focus for sustainable development and recognise the need to address a range of housing requirements in a manner which increases the opportunity for people to participate in active lifestyles, secures improvements to open space and ecological assets and mitigates the impact of climate change.

With reference to the section of the 'Vision' relating to Halesworth and
Holton (Page 24), we would strongly support the significant role that Halesworth plays in being a service centre on the southern edge of the District. In particular, we would emphasise the role it has in servicing villages in both Waveney and the adjoining Suffolk Coastal District. In addition to the provision of much needed housing, there is a need to re-vitalise the sports & leisure, health and employment opportunities in the town that has been lacking in the recent past. In collaboration with Halesworth Campus Development Board and Halesworth Playing Field Association, the site at Harrisons Lane is uniquely placed to deliver the overarching vision of the Local Plan.

Attached documents
S Read
Marrons Planning (Jenny Keen)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1494

Comment

In principle we wholly agree with the Council’s vision for rural areas and that, "through allowing more growth than in recent years, settlements in the rural areas will become more sustainable and more vibrant". We also wholly endorse the statement that, "through the provision of a wide range of types and tenures of housing, new homes will be more affordable in the rural areas, allowing people with a local connection or those who work in the rural areas to live in the rural areas, and new housing will also help support existing services and facilities in the rural areas such as small rural schools and pubs".

We fully support the proposed flexible approach to the scale of development which seeks to provide around 9,019 homes over the plan period (2014-2036) of which 963 homes are to be provided in the rural areas.

We wholly agree with paragraph 1.21 which states that, "the strategy reflects the need to support the numerous villages across Waveney. The strategy therefore allocates a more significant level of growth to villages than has been experienced in previous Local Plans. This reflects the fact that the sustainability circumstances of villages has changed with more people being able to work from home and using the internet for services such as shopping and banking. It also reflects the fact that without development, the population of villages will decline due to the trend of increasingly smaller households. More significant levels of development will allow people with a local connection or those who work in the rural areas to live in the rural areas. New housing should also help support existing services and facilities in the rural areas such as small rural schools and pubs and help extend super-fast broadband into these areas."

We also endorse the Council’s commitment in Policy WLP1.1 which seeks to make provision for the delivery of a minimum 8,223 dwellings in Waveney.
between 2014 – 2036 allocating 12% of growth to the rural areas.

Attached documents
**Simon Phillips**

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Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 991

Comment Draft Policy WLP1.1 Scale and Location of Growth

2.9 Draft Policy WLP1.1 confirms the proposed scale and location of growth for the district for the plan period.

2.10 It confirms that 12% of new residential development will be directed to the Rural Area.

2.11 Draft Policy WLP1.1 states that "Provision has been made in this Local Plan through site allocations and policies to deliver this scale and strategic distribution of growth. Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy".

2.12 The Somerleyton Estate supports the overall distribution of housing growth as it most closely represents Government policy and guidance on supporting rural communities.

2.13 The Somerleyton Estate also acknowledges the focus on neighbourhood plans, where relevant, to further develop the detail of development in the rural growth locations. This is important in villages such as Somerleyton where pockets of local concern about housing growth are balanced with concern about the loss of rural service provision.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section
Policy WLP1.1 - Scale and Location of Growth

Comment ID 1422

Comment
At the previous Issues and Options stage the Sotterley Estate supported Growth Option 3.

Growth Option 3 proposed to direct the largest proportion of housing to the sustainable rural settlements and the Sotterley Estate considered this reflected Government policy and guidance on rural housing.

Paragraph 1.21 of the consultation document explains that:

"Importantly, the strategy reflects the need to support the numerous villages across Waveney. The strategy therefore allocates a more significant level of growth to villages than has been experienced in previous Local Plans. This reflects the fact that the sustainability circumstances of villages has changed with more people being able to work from home and using the internet for services such as shopping and banking. It also reflects the fact that without development, the population of villages will decline due to the trend of increasingly smaller households. More significant levels of development will allow people with a local connection or those who work in the rural areas to live in the rural areas. New housing should also help support existing services and facilities in the rural areas such as small rural schools and pubs and help extend super-fast broadband into these areas."

The Sotterley Estate supports the Location of Growth and Distribution of Housing as set out in this consultation because it echoes the Growth Option 3 which the Estate supported at the Issues and Options stage.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1424

Comment Draft Policy WLP1.1 confirms the proposed scale and location of growth for the district for the plan period.

It confirms that 12% of new residential development will be directed to the Rural Area.

Draft Policy WLP1.1 states that "Provision has been made in this Local Plan through site allocations and policies to deliver this scale and strategic distribution of growth. Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy".

The Sotterley Estate supports the overall distribution of housing growth as it most closely represents Government policy and guidance on supporting rural communities.

The Sotterley Estate also acknowledges the focus on neighbourhood plans, where relevant, to further develop the detail of development in the rural growth locations.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1434

Comment The Sotterley Estate broadly support the draft local plan and in particular the proposed 'rural strategy' which has sought to address the acknowledged historic lack of development in rural areas such as Willingham.

The Sotterley Estate support the quantum of development which the draft local plan proposes for Willingham and maintains that the draft site allocations WLP7.19 and WLP7.20 remain available, achievable and deliverable.

The Sotterley Estate looks forward to working with relevant organisations on the sustainable future development of the village.

Attached documents
Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 1498

Comment Policy WLP1.1 sets out the distribution of growth strategy for the District. The strategy seeks to focus the majority of proposed housing and employment growth in Lowestoft (55% of housing growth and 60% of employment land development).

With regards to location of growth, our client broadly supports the approach taken in Policy WLP1.1 in that it is consistent with national planning policy of promoting and supporting sustainable economic development. Lowestoft is the largest town in the District and accommodates approximately half of the District's population. This strategy set out in Policy WLP1.1 will also enable a continuing focus on regeneration of the central areas of Lowestoft which is consistent with one of the core planning principles of the NPPF - to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value (paragraph 17).

However, in terms of the scale of housing growth, our client wishes to make the following observations.

Policy WLP1.1 refers to a minimum housing requirement of 8,223 new homes over the plan period, equating to 374 dwellings per year. This is based on the Objectively Assessed Need (OAN) identified in the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) 2017. However, the SHMA also identifies that the annual affordable housing need in Waveney District is for 208 additional properties, which equates to 55% of the annualised OAN.

The National Planning Practice Guidance (NPPG) states that an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes (Paragraph 029, Reference ID: 2a-029-20140306). As such, the Council may
need to consider an uplift to take account of the high need for affordable housing identified within the SHMA and to support the delivery of new affordable homes alongside market housing.

Furthermore, it is also relevant to also ensure that the Plan demonstrates a deliverable supply of 5 years' worth of housing land.

The Waveney District Council Statement of a 5-year supply of housing land, published September 2016, confirms that, as of March 2016 and incorporating the 20% buffer, Waveney District's requirement is 1,888 dwellings. A supply of 2,174 is claimed to be demonstrated, equating to a 5.8 year supply.

The claimed 2,174 supply includes 485 dwellings within the Kirkley Waterfront and Sustainable Urban Neighbourhood site (310 from the Brooke Peninsula site, 155 from the Former Sanyo site and 20 from 'other sites').

In terms of the Brooke Peninsula site, outline planning permission was granted in August 2015 but the developer, Cardy Construction went into administration in 2016. There has therefore been no progress made over the last two years in terms of a subsequent Reserved Matters application or the discharge of pre-commencement conditions.

In terms of the former Sanyo Factory site, Waveney District Council agreed a contract with Sanyo in 2014 to buy the site and secured a grant from the Homes and Communities Agency (HCA).

The HCA required the homes to be built and occupied by 31 March 2018 and the contract required Sanyo to clear the site of existing structures and contaminated materials by 31 Jan 2016. Planning permission was granted in January 2016 but Sanyo failed to clear the site and therefore the sale did not proceed.

Our client therefore has concerns whether the Council can robustly demonstrate a supply of sites which are deliverable in the short term from the beginning of the Plan. As such, the Council must look to create flexibility in the Council's housing position. The Council must also provide more detail on how they will monitor their land supply and what measures will be undertaken if they fall behind with their housing delivery.

Attached documents
Tim Basey-Fisher

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 773

Comment The locations of growth are generally supported, and the acknowledgement and identification of Bungay as a settlement to accommodate growth is important. However, Bungay’s scale of growth equates to around 6% (527 units 2014-2036) of the overall District total. This is only around 24 new residential units per year. This seems low and should be more ambitious. Bungay has the capacity to accommodate around 8% of growth, and could deliver around 35 units per year and around 770 units over the plan period. This is considered to be a 'reasonable' level of growth, in line with the Key Diagram. It is accepted that there may be a need to identify strategic reserve sites in case the allocated sites and windfall sites in the town do not meet the targets.

In any event the Local Plan's new residential numbers should be presented as minima, not ceilings to development. The Council has a Duty to Cooperate and the Local Plan should also include flexibility to help meet needs of adjacent districts where housing market areas cross administrative boundaries. Also, the Plan needs flexibility to help meet affordable housing needs particularly where the means of delivery is through contributions/units associated with market housing developments. Also, given that Bungay is one of the District's main market towns the Local Plan should identify the level of retail growth that needs to be accommodated in the town.

Required Changes:

Amend the Policy to increase the housing number for Bungay from 6% - (527 units) to 8% (770 units).

Amend the Policy to acknowledge that strategic reserve sites may be required to accommodate higher levels of growth; and seek to identify the strategic reserve sites. Amend the Policy to confirm that the housing numbers of mimima to achieve and not ceilings to development.
Attached documents
Tim Basey-Fisher

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 775

Comment The Strategy for Bungay should be to allow for a 'reasonable' level of growth as identified in the Local Plan Key Diagram. The Local Plan should be looking to increase delivery and growth opportunities in the town where possible. The Local Plan should seek to identify 'strategic' reserves sites to be considered should the proposed allocations be delivered before the end of the plan period and assessed housing need remain unmet.

Required Changes:

Amend the text and table to increase the housing number for Bungay from 6% - (527 units) to 8% (770 units between 2014-2036). Consider identification of 'strategic reserve' site(s) to accommodate unmet housing need in the district, if it cannot be met by allocations and windfall sites.

Attached documents
Warnes & Sons LTD B Warnes
Wheatman Planning Ltd. (Deirdre Linehan)

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 937

Comment Scale of growth

Further to comments made under "Overall Spatial Strategy" we do not consider that the proposed housing allocations within the First Draft Plan will enable the District Council to meet their identified housing needs over the plan period. It has been several years since the annual housing target, identified within the existing Local Plan as 290 dwellings per year, has been met. Paragraph 1.3 of this section "Scale and location of growth" states that more people are moving into the District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth therefore the demand for housing is growing. It is acknowledged therefore that there is potential for a real "supply v demand" issue to develop if identified needs aren't met pushing house prices up and making it more difficult for young people to get on the housing ladder. It also places the Council at risk of facing development proposals in inappropriate locations through lack of a five year housing land supply.

Despite these issues being clearly identified within the First Draft Plan it is considered the approach proposed by the Council for housing development is significantly flawed. Overreliance is being placed on large allocations to contribute to the housing need and there are insufficient medium and small scale allocations that are likely to come forward and deliver housing more quickly and make reliable contributions towards resolving some of the annual housing need that has been identified as 374 dwellings per year in the First Draft Plan.

Location of growth

The First Draft Plan proposes that 55% of new growth or 4991 dwellings will be built in Lowestoft (includes Carlton Colville, Oulton and Oulton Broad) between 2014 and 2036. This includes the two large allocations referred to
above which when fully developed are expected to deliver a combined total of approximately 2200 dwellings. The site in North Lowestoft however is only expected to deliver just over half of its housing allocation during the Local Plan period, approx 760 dwellings. The combined total expected to be delivered by the two sites during the plan period therefore is 1560 dwellings or approximately 31% of the total housing requirement for Lowestoft. We consider this expectation to be overly optimistic with over reliance being placed on these two sites, that are not without considerable constraints, to deliver almost a third of the total housing requirement for Lowestoft during the new local plan period.

Historically large sites generally have not proved a successful option in terms of housing delivery and this is particularly true in Lowestoft. There are several examples to back up this argument including the Woods Meadow site which was originally allocated for development in the 1996 Waveney Local Plan but only started delivering houses during 2015. A multitude of issues involved complex relationships between various developers related to upfront infrastructure delivery resulted in lengthy delays to the commencement of development of this site. This was not aided by fluctuations in the housing market affecting developer confidence on a major site.

A number of other large allocations within the existing local plan display a similar pattern including Kirkley Waterfront (SSP3) which includes the old Sanyo Site (approximately 350 dw) and Brooke Peninsula and Jen Weld Site (850 dw). None of these sites have yet delivered any dwellings despite predictions from WDC going back several years that the development of these sites was imminent. It is acknowledged that these latter sites are brownfield development which can often pose additional issues and constraints that are difficult to overcome. Notwithstanding this however it can still be questioned whether it is wise of the District Council moving forward to continue to place reliance on large allocations to meet their housing needs when there are smaller and more easily developed sites in equally if not more suitable locations such as the land at Hall Road Carlton Colville put forward by our client. We will expand further on the benefits of including our client’s site as a residential allocation in our response to "The Alternative sites considered"

Watts

Section Policy WLP1.1 - Scale and Location of Growth

Comment ID 243

Comment I strongly object to the proposed building of an extra 740 houses within Halesworth and Holton, which will increase the number of dwellings in the town by about 30%. The infrastructure of the town is already struggling to cope with the needs of the existing residents e.g. primary school places, doctors surgery, sports and leisure facilities.

Also, to build on this scale (which is out of all proportion to the needs of the current residents) is more or less guaranteed to see farmland and green space disappear under concrete and tarmac.

Both Halesworth and Holton see flooding on a regular basis. More houses can only exacerbate these problems because the surrounding countryside helps to soak up some of the heavy rainfall that we experience from more frequent storms.

Attached documents
Key Diagram

Broads Authority Natalie Beal

Section  Key Diagram

Comment ID  466

Comment  Figure 6. The blue square is flood defence; is that the grey square on the Lowestoft blob or the blue polygon where the sea is? The district boundary is buffered with a beige thick line. I don't think this is the AONB, but what is it? I cannot see it on the legend.

Attached documents
M J Edwards & Partners Chris Edwards  
Strutt and Parker (Melissa Reynolds)

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<tr>
<td>Comment</td>
<td>The Key Diagram at page 32 identifies Corton as a Large Village, where growth will be focussed. This is welcomed.</td>
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</table>

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section
Key Diagram

Comment ID
803

Comment
Heritage Coast is a linear designation and there is no defined 'landward' geographical boundary. The Heritage Coast designation should be illustrative for the purposes of the Fig. 6 map.

Attached documents
Policy WLP1.2 - Presumption in Favour of Sustainable Development

Gladman Developments Limited Richard Crosthwaite

Section Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 947

Comment Gladman are supportive of the emphasis of Policy WLP 1.2. The Policy seeks to affirm the Local Planning Authority’s commitment to making local planning decisions based on a presumption in favour of sustainable development. It provides assurance of a local approach to planning that will proactively seek to improve the social, environmental and economic well-being of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the Local Plan. The ethos of sustainable development is key to assessing planning proposals, it is the golden thread running through the Framework.

Attached documents
Historic England

Section Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 1372

Comment As currently drafted, the reference in this policy to granting permission unless, "the proposal would undermine the achievement of the vision and objectives set out in this Local Plan," is concerning unless our comments relating to embedding the historic environment in the vision and objectives of the Local Plan are incorporated.

Attached documents
Section Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 1465

Comment Presumption in Favour of Sustainable Development - Object

The National Planning Policy Framework (NPPF) states at Paragraph 151 that Local Plans should be consistent with the principles and policies set out in the NPPF, including the presumption in favour of sustainable development. The presumption in favour of sustainable development is set out at NPPF Paragraph 14 which states that for decision-taking it means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

* any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

* specific policies in this Framework indicate development should be

In its current form Policy WLP1.2 is clearly not in accordance with Paragraph 14 as in addition to the two bullets above it adds a third stating that where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, planning permission will be granted unless:

* the proposal would undermine the achievement of the vision and objectives set out in this Local

This additional bullet is clearly inconsistent with the aims and objectives of the NPPF which seeks to ensure the delivery of sustainable development in cases where the vision, objectives and policies of local plans have failed to deliver. Policy WLP1.2 cannot therefore be considered sound and should be amended in accordance with NPPF Paragraph 14.
Attached documents
Norman Castleton

**Section**  
Policy WLP1.2 - Presumption in Favour of Sustainable Development

**Comment ID**  
410

**Comment**  
Presumption in Favour of Sustainable Development and Settlement Boundaries: I would question whether this plan is sustainable or rather whether this plan can be sustainable given the current governments interpretation of the meaning of the word or their interpretation of the precautionary principle. How can a plan that includes hard-coring over large areas of previously undeveloped or agricultural land be sustainable? The extra call on utility services, health and transport creating pollution alone will make this plan unsustainable. I think these are just words to gloss over the basic environmental weaknesses’ of this plan.

**Attached documents**
Simon Phillips

Section Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 1048

Comment I agree with WLP1.2

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 1588

Comment • South Norfolk Council support the reference in Policy WLP1.3 to Neighbourhood Plans being able to make minor adjustments to settlement boundaries and allocate additional land provided that the overall distribution strategy would not be undermined and development would not be contrary to other policies in the plan.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section  Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID  804

Comment  Amend to specific national policies indicate that the development should be refused or restricted.

Attached documents
Tim Basey-Fisher

Section
Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID 774

Comment
The presumption that planning applications in accordance with the Local Plan will be approved is supported. Planning applications that are in accordance with the emerging Local Plan should be treated in the same way.

Required Change:
Amend the text to confirm that the presumption will also apply in the interim period up until the adoption of the Local Plan.

Attached documents
Watts

Section  Policy WLP1.2 - Presumption in Favour of Sustainable Development

Comment ID  244

Comment  With regard to point 1.27 which mentions that Local Plans should have enough flexibility to adapt to change, I refer to my previous comment about future population trends not matching the expected trends based upon out-of-date 2010-2015 estimates. Where is the flexibility with regards to housing and employment development?

Attached documents
**Policy WLP1.3 - Settlement Boundaries**

**Anonymous**

**Section** Policy WLP1.3 - Settlement Boundaries

**Comment ID** 728

**Comment** What has happened to the physical limits which were a boundary regarding future developments and the government promise of building on brownfield first, the Hall Land/ Union Lane preferred site is definitely greenfield and outside the physical limits.

**Attached documents**
Geoffrey Cackett

Section   Policy WLP1.3 - Settlement Boundaries

Comment ID   125

Comment   We have attached three plans to help you understand our objection to the current siting of the settlement boundary on the NE side of our property.

Plan SK268609 shows we own the entire property edged in red. The large rectangular piece of land has always been part of the property and is within the Conservation Area. Some years ago the Conservation Officer found out what they thought to be a field was in fact our garden and hastily included it within the Conservation Area. In fact the whole of no. 6 had been omitted from the original plan. Consequently we suddenly had additional planning hurdles to contend with.

Our submission is that our property should not be "split in two" and that the Settlement boundary should coincide with the NE line of the Conservation Area currently dotted in Red. Our garden is quite extensive (larger than cottages 1-6 put together) and already accommodates a large garage and turning Area. In time this would make an ideal place for an extra dwelling in the village. So to ignore our complaint would severely prejudice us financially.

We would be extremely grateful if you could revise the Settlement boundary as requested. Please do not hesitate to contact us should you need further information. A copy of this email has been sent to the Holton Parish Council.


http://consult.waveney.gov.uk/gf2.ti/af/799778/134849/PJP-/8587093%20image1.JPG
George Harvey

Section  Policy WLP1.3 - Settlement Boundaries

Comment ID  1276

Comment  Looking at the proposed settlement boundary for Westhall it is noticeable that it has been drawn tightly around existing properties, so much so that it would be very difficult for any infill development to take place. This is contrary to your reasoning for settlement boundaries in paragraph 1.29 of allowing "for flexibility in the Local Plan by potentially allowing more development than is planned for by the allocation of specific sites."

To take this further I attach a plan showing the "limits to development" for Westhall from a previous Local Plan. It was slightly more generous than the boundary now proposed and included undeveloped land fronting Wangford Road at Westhall Mill and an area (shaded H4.7) to the south-east of Orchard House which was officially designated for new housing. This area is still undeveloped and I think it should be included again within the proposed settlement boundary.

Westhall is characterised by linear, frontage only development and I would argue that the development of the areas mentioned above would be more in keeping with this and sequentially preferable to other sites such as that proposed in Policy WLP7.21 in the new draft plan.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP1.3 - Settlement Boundaries

Comment ID 948

Comment Gladman note that the Local Plan proposes the use of settlement boundaries. The use of settlement limits risks putting a strategy in place that arbitrarily restricts suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. This applies to all settlements whether named within the "Settlement Hierarchy" or not. Gladman would be opposed to the definition of the settlement edge if this would preclude appropriately sited and sustainable development coming forward to meet the District’s housing needs, in accordance with the 'Presumption in Favour of Sustainable Development'. Proposals that are sustainable should go ahead without delay and an overly restrictive approach could result in a plan that is not considered to be positively prepared or effective.

Attached documents
Holton Parish Council Elaine Day

Section Policy WLP1.3 - Settlement Boundaries

Comment ID 980

Comment

Dear Colleagues

Holton Parish Council considered the draft Waveney Local Plan at their meeting on the 6th September 2017 and resolved to formally support the response made by Councillors G Cackett and A Cackett in relation to the infringement of their property's boundary as highlighted on the plan.

Details are below, including attachments

Best wishes

Dawn

Dawn Henry

Clerk, Holton Parish Council

---------- Forwarded message ----------

From: Geoffrey Cackett

Date: 11 August 2017 at 11:48

Subject: Objection to current /proposed position on plan of Settlement boundary in Holton

To: "waveneylocalplan@eastsuffolk.gov.uk [mailto:waveneylocalplan@eastsuffolk.gov.uk] " Cc: Dawn Henry

Dear planning officers. 6 the street holton .ip198ph.

We have attached three plans to help you understand our objection to the current siting of the settlement boundary on the NE side of our property.

Plan SK268609 shows we own the entire property edged in red . The large rectangular piece of land has always been part of the property and is within the Conservation Area. Some years ago the Conservation Officer found out
what they thought to be a field was in fact our garden and hastily included it within the Conservation Area. In fact the whole of no. 6 had been omitted from the original plan.

Consequently we suddenly had additional planning hurdles to contend with.

Our submission is that our property should not be "split in two" and that the Settlement boundary should coincide with the NE line of the Conservation Area currently dotted in Red.

Our garden is quite extensive (larger than cottages 1-6 put together) and already accommodates a large garage and turning Area. In time this would make an ideal place for an extra dwelling in the village. So to ignore our complaint would severely prejudice us financially.

We would be extremely grateful if you could revise the Settlement boundary as requested. Please do not hesitate to contact us should you need further information. A copy of this email has been sent to the Holton Parish Council.

Yours sincerely,

Councillor A Cackett, and G. Cackett, Chair of Holton Parish Council.

Attached documents
Peter Eyres

Section Policy WLP1.3 - Settlement Boundaries

Comment ID 1207

Comment Grammar niggle: Para. 1.30 and many other places

In English English, outside (and inside) are prepositions and do not need the addition of "of", as happens in American English.

Attached documents
Simon Phillips

Section Policy WLP1.3 - Settlement Boundaries

Comment ID 1049

Comment I strongly agree with WLP1.3

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section

Policy WLP1.3 - Settlement Boundaries

Comment ID

992

Comment

Draft Policy WLP1.3 Settlement Boundaries

2.14 Draft Policy WLP1.3 states (our emphasis): "Settlement boundaries are defined on the Policies Map. Land which is outside of settlement boundaries and allocations in the Local Plan and Neighbourhood Plans is considered as the Countryside. New residential, employment and town centre development will not be permitted in the Countryside except where specific Policies in this Local Plan indicate otherwise. Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other Policies of this Local Plan. Neighbourhood Development Orders can permit development outside of settlement boundaries providing that the overall distribution strategy outlined in Policy WLP1.1 is not undermined and the development would not be contrary to the other Policies of this Local Plan".

2.15 The Somerleyton Estate supports the provision in draft policy WLP1.3 for neighbourhood plans to be given the flexibility to make adjustments to the site allocations without affecting the overall distribution strategy set out in this consultation document. This is important in Somerleyton where the draft local plan expects development to contribute towards community facilities and new drop-off provision for the school.

Attached documents
**Sotterley Estate Tom Barne**  
Evolution Town Planning LLP (Steven Bainbridge)

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP1.3 - Settlement Boundaries</th>
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| Comment ID | 1425 |

| Comment | Draft Policy WLP1.3 states (our emphasis):  
"Settlement boundaries are defined on the Policies Map. Land which is outside of settlement boundaries and allocations in the Local Plan and Neighbourhood Plans is considered as the Countryside. New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan indicate otherwise. Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other Policies of this Local Plan. Neighbourhood Development Orders can permit development outside of settlement boundaries providing that the overall distribution strategy outlined in Policy WLP1.1 is not undermined and the development would not be contrary to the other Policies of this Local Plan".  

The Sotterley Estate supports the provision in draft policy WLP1.3 for neighbourhood plans to be given the flexibility to make adjustments to the site allocations without affecting the overall distribution strategy set out in this consultation document. |

**Attached documents**
Watts

Section Policy WLP1.3 - Settlement Boundaries

Comment ID 245

Comment Where can I review the Policies Map in order to see the Settlement Boundaries?

Attached documents
Policy WLP1.4 - Infrastructure

Amec Foster Wheeler E&I UK Hannah Lorna Bevins

Section Policy WLP1.4 - Infrastructure

Comment ID 333

Comment National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.

Attached documents
Anglian Water Services Limited Stewart Patience

Section  Policy WLP1.4 - Infrastructure

Comment ID  1354

Comment  Anglian Water welcomes the inclusion of reference to existing water recycling centres and wastewater network and the need for applicants to demonstrate that capacity is available. However there may be circumstances in which capacity is not currently available within the public sewerage network or where part of development could be accommodated before mitigation is required.

It is therefore suggested that Policy WLP1.4 should be amended as follows:

'Specifically, developers should ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development.'

In addition it would be helpful if Policy WLP1.4 made reference to use of planning conditions particularly in relation to the phasing of development where required.

Attached documents
**Barnby Parish Council Jayne Evans**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP1.4 - Infrastructure</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1236</td>
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<tr>
<td>Comment</td>
<td>The view of Barnby Parish Council on the Waveney Plan is as follows.</td>
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</table>

General views on Waveney Local Plan

Barnby Parish Council is of the view that the A146 from Barnby to Carlton Colville is not fit for purpose. It is poorly built and needs frequent repairs; it is dangerous because of the notorious sharp corners; and there are several dangerous junctions from small roads. For this reason, Barnby Parish Council intends to campaign for a new road to replace this section of the A146, in partnership with other Parish and Town Councils. Barnby Parish Council requests that Waveney District Council puts its weight behind this campaign, since it is in the interest of all local communities including Lowestoft.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section       Policy WLP1.4 - Infrastructure

Comment ID    1013

Comment       The Beccles Southern Relief Road will deliver some relief to the communities of Beccles and Worlingham. We are concerned that this relief will not be maximized and that it may be eroded with time. We would like to see through traffic discouraged by:-

* diverting the A145 along the BSRR avoiding the town altogether

* reducing speed limits on approach roads into Beccles & Worlingham and within all residential areas

* introducing severe weight limit restrictions to ensure that HGVs avoid the town wherever possible and approach the town via the most appropriate access point rather than the first access point reached.

Attached documents
Section Policy WLP1.4 - Infrastructure

Comment ID 551

Comment Cycle, trains and buses too are important.

Attached documents
Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP1.4 - Infrastructure

Comment ID 1121

Comment The Benacre Company supports the notion that the Local Plan (LP) will include necessary infrastructure improvements as identified in the draft policy. We particularly support the improvements to the A12 between Lowestoft and Ipswich and would draw the Council’s attention to the historic plans to by-pass the village of Wrentham.

We also support the Council’s objective to work with the telecommunications industry to maximise access to superfast broadband, wireless hotspots and improved mobile signals for all residencies and businesses within the LP area. We see this as vitally important to grow the year round economy in the coastal region.

Attached documents
Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section Policy WLP1.4 - Infrastructure

Comment ID 1475

Comment The Company considers that draft Policy WLP1.4 should be re-phrased to ensure consistency with national policy. Paragraph 173 of the NPPF states:

'To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'

Hence the requirement for infrastructure provision from developments should therefore be proportionate to the location, nature and scale of development proposed. The revised policy should therefore be reworded as follows:

'AllWhere appropriate and viable, development will be expected to contribute towards infrastructure provision to meet the needs generated by that development.'

Attached documents
David Rogers

Section Policy WLP1.4 - Infrastructure

Comment ID 1091

Comment Much mention is rightly made about the needs for any developments to take into account the local infrastructure and to make appropriate arrangements to accommodate any change.

In my view, the most important of these are education, health and transport, which are all intrinsically linked to the environment and quality of life.

• Educational provision is seriously lacking, both in quality and access. Schools are in many cases over-subscribed, under-staffed, or under threat of closure. It is no surprise, then, that pupil achievement is below the national average. Equally, it is therefore no surprise that although the area itself holds many attractions, it fails to attract quality teachers. And travel to school by bus or car is, of course, the norm for most students. Pupil motivation is also adversely affected by local and/or other post-school prospects and unemployment levels.

• Access to health provision is a major issue, especially because we have an ageing population. My wife and I are both retired and generally fit and healthy. We have benefited from excellent care locally and within the wider area when needed, but are fully aware of the enormous pressures on the NHS and appreciate that some residents have not always been happy with their experience.

• Transport provision is not only a key to the above, but also to so many other services, not least shopping and entertainment, but most importantly employment.

Rail provision, or lack of adequate rail provision, is often in the news, and not just locally. Regrettably for the wrong reasons: such as cost, delays, and unexplained cancellations. In addition, commuters are now being discriminated against in job applications.

18 Sept 2017 Rail improvements to take place at weekends and over
Christmas

Rail passengers are being warned that upgrades for the Crossrail project and work to install new overhead wires on the line between Norwich and London, will take place at weekends from October to December with a 10-day closure at Christmas.

The road network is also an issue. As a largely rural community, our quiet country roads and a relative lack of traffic represent a major bonus to many locals and visitors alike. The countryside is a local and national treasure that we must value and protect for future generations.

With relatively few trunk roads, any disruption has serious impacts on a range of factors: including access to employment/education/health/trade/leisure.

18 Sept 2017 Night closures to begin on Orwell Bridge

The Orwell Bridge is going to be closed between 21:00 and 05:00 every week night from today until Saturday 8 October. The closures are due to an ongoing inspection of the 35-year-old structure. A diversion will take traffic between junctions for Copdock and Seven Hills around the north of Ipswich.

In my view, any increase in population, new housing will have an extremely challenging impact on the above services, pose a serious threat to all aspects of our lives, and represent a major environmental threat.

Attached documents
The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.

The ESFA launched on 1st April 2017, brings together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.

Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

The ESFA welcomes Policy WLP1.4 Infrastructure which requires developers to consider infrastructure requirements need to support development; and makes it clear that "development will be expected to contribute towards infrastructure provision to meet the needs generated". The direct reference to new primary school provision is also supported: "New primary schools should be provided on sites where there is no capacity within local catchment schools and there is no potential to expand the local schools to accommodate the pupils arising from the development."

Given the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document.
particular:

- The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

- The ESFA supports the principle of Waveney District Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

- Waveney District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156), the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.

In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Local Plan, securing site allocations for schools as well as providing example policies to aid
delivery through Development Management policies.

Ensuring there is an adequate supply of sites for schools is essential and will ensure that Waveney District Council can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the district over the plan period.

Site Allocations

The draft Local Plan includes site allocations incorporating four new schools. Three of these relate to strategic new developments in and around Lowesoft:

* New 1.5 FE primary school on the Kirkley Waterfront and Sustainable Urban Neighbourhood site (Policy WLP2.4), a mixed use scheme including 1,380 homes on a site of 60 hectares.

* New 2 FE primary school on the North Lowestoft Garden Village site (Policy WLP2.12). The site allocation (78 hectares) includes 1,400 new homes and 8.5 hectares of employment land. Development is not expected to start until 2026; it is anticipated that approximately 740 homes will be delivered within the plan period with the remainder constructed between 2036 and 2044.

* New 1 FE primary school (2 hectares) on Land south of The Street, Carlton Colville/Gisleham (Policy WLP2.15), a mixed use scheme including 800 homes on a site of 55 Hectares.

A fourth school is allocated as part of the strategy for Beccles and Worlingham:

* New 1.5 FE primary school (2 hectares) on the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1), an 86 hectare site allocated for a mixed use development including 1,250 new dwellings.

The ESFA notes that no sites have been allocated for secondary schools in this district at this stage, based on calculations presented in the Draft Infrastructure Study that indicate need can be met by extension of an existing secondary school. Waveney's Regulation 123 List indicates this will be funded by the Community Infrastructure Levy (CIL).

The identification of specific sites for new primary schools and identification of the anticipated size of school required for each site is strongly supported. The next version of the Local Plan should seek to provide additional details of the requirements for delivering the new schools, including when they
should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017.

While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the council consider highlighting in the next version of the local plan that:

- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that

- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.

I hope the above comments are helpful in shaping Waveney District Council’s Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.

Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Waveney District Council to aid in the preparation of the Local Plan.

Forward Funding

In light of strategic site allocations including schools set out in the Local Plan, emerging ESFA proposals for forward funding schools as part of large residential developments may be of interest to the council. We would be happy to meet to discuss this opportunity at an appropriate time.

Evidence Base

The approach to planning for schools should be ‘justified’ based on proportionate evidence. It would be useful if a Planning for Schools topic/background paper could be produced, expanding on the evidence in the Draft Infrastructure Study and Suffolk County Council’s Education and
Learning Infrastructure Plan, setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. The ESFA notes that a standard value of 0.25 primary school pupils and 0.1 secondary school pupils from each new dwelling (2+ bedrooms) was used to calculate pupil yield from development, as suggested by Suffolk County Council; however, it is unclear what evidence these figures are based on and if needs updating (see also section on developer contributions below).

Producing a schools topic/background paper would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing good practice examples of such background documents relevant to this stage of your emerging Plan.

Developer Contributions and CIL

One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Waveney District has an adopted CIL charging schedule and that the Regulation 123 List identifies that this funding is anticipated to be used for, amongst other things, provision of primary school places at existing schools and provision of secondary school places. In contrast the funding of new primary school places has not been identified, so it the local authority retains flexibility to use CIL or s106 to fund this provision. Guidance on s106 planning obligations is provided in Suffolk County Council’s 'Topic Paper 4 - Education Provision' (July 2015). While this may be in need of updating (for example, it refers to a figure of 0.18 for secondary school pupils per dwelling, whereas the Draft Infrastructure Study published in 2017 refers to a figure of 0.1) the ESFA broadly supports the Council’s approach to ensuring developer contributions address the impacts arising from growth.

The ESFA would be interested in responding to any CIL review or amendments to the Regulation 123 list. As such, please add the ESFA to the database for future CIL consultations.
Attached documents
Elaine Snell

Section Policy WLP1.4 - Infrastructure

Comment ID 253

Comment Monday 7th August 2017, I visited the Beccles Library to look at the proposed plans for housing, employment and tourism for the future 20 years.

I took away the newspaper type details, 12 pages of proposed plans. Have your say by the 22nd September.

It seems to be a rush, how long has Beccles waited for the 'Southern Ring Road' and Lowestoft the 'Third Crossing'. We are expected to comment on what could be significant changes to the lives of residents, which once implicated will have far reaching effects.

I understand the need for new houses and for growth, and hope that I would not be classed as a 'NIMBY', however, once these proposed plans have been accepted and passed will that be it? Is it subject to change, adjustments and possible additions to cope with what could happen in the next 20 years?

How will the plan be implemented, what is the time scale, what parcel of land will see the construction of homes first?

These are all important points that affect how we see these proposals and understand all the implications.

Many Beccles residents are worried about how our health services will cope with extra patients, when they seem to have difficulty staffing for the existing population. Will we keep our hospital and would there be the possibility of reopening the minor injuries unit? This would obviously be beneficial.
Environment Agency

Section Policy WLP1.4 - Infrastructure

Comment ID 858

Comment Paragraph 1.35 states the Lowestoft Flood Risk Management Project involves reducing flood risk in central Lowestoft, we feel it would be useful to include that the scheme is designed to deliver flood risk benefits from all sources of flooding across the whole town, not just central Lowestoft.

We are pleased to see the statement that development will not be permitted where capacity at water recycling centres (WRC) is an issue. We would recommend liaison with water companies and ourselves throughout the plan period to ensure adequate capacity is available.

Attached documents
Highways England David Abbott

Section  
Policy WLP1.4 - Infrastructure

Comment ID  
1529

Comment  
It is vital that the cumulative effects of sites in the Lowestoft area on the A47 trunk road are fully understood and that suitable mitigation measures identified accordingly, and associated with those sites where appropriate.

Attached documents
Historic England

Section

Policy WLP1.4 - Infrastructure

Comment ID

1373

Comment

We note at paragraph 1.45 and in Policy WLP1.4 – Infrastructure the reference to telecommunications and access to broadband. Reference should be made to the Cabinet Siting and Pole Siting Code of Practice: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf

Attached documents
John Clark

Section  
Policy WLP1.4 - Infrastructure

Comment ID  
120

Comment  
As for the infrastructure we need the third crossing of the river now, also more buses that run up to 2300 (11pm) not finish at 1900 (7pm) a bus service from Lowestoft to Ipswich a hourly service, the reason is if you miss the train to Ipswich you have to Norwich and then onto Ipswich.

Attached documents
John Lavery

Section Policy WLP1.4 - Infrastructure

Comment ID 338

Comment Finally infrastructure, health, recreation and industrial work unit developments. In the original plan many of these - especially Health provision given an ageing population - are not adequately provided for. However, if the housing is dramatically reduced as I indicated - and the other provisions are implemented as discussed in your plan - the whole thing might just be in balance!

Attached documents
Judith Condon

Section Policy WLP1.4 - Infrastructure

Comment ID 627

Comment Health care is a major concern in Halesworth in particular as we are so far from the nearest district hospitals, and so care must be taken to provide sufficient NHS surgeries and beds to meet the needs of larger populations.

In Halesworth there is concern about drainage – flash flood in the Thoroughfare on Tues 8 August 2017 a case in point – as a lot of water heads through the middle of town. Is there sufficient drainage for development at Chediston Street? What about increased traffic down Dukes Drive and at junction?

Attached documents
Lowestoft Town Council Shona Bendix

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| Comment ID   | 1305                          |

| Comment       | 1.42 Housing sites of 1 hectare or more are generally large enough to provide usable open space. The LTC urges the Council to require open space for ALL developments of this size or larger. Not "generally". The LTC also urges the Council to require that the open space in a new development be contiguous and located at the front boundaries of all new developments. All new public spaces should be developed in consultation with the future parish landowner who will be responsible for its upkeep. To enhance and protect the natural and built environment – Policy for green space on page 222. |

| Attached documents | |
|--------------------|
**Lowestoft Town Council Shona Bendix**

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**Comment**

38 Waveney has a community infrastructure levy in place since August, 2013. Larger sites in the Lake Lothing area have zero Levy rate and the Council will negotiate bespoke section 106 agreements to deliver infrastructure on site.

The LTC urges that the Council encourage all efforts to maintain and improve broadband speed and access for residents and business, and that all efforts to use the most up to date technology be pursued, to include fiber optic connection to the end user (FTTP).
Mr & Mrs M J Venn

Section Policy WLP1.4 - Infrastructure

Comment ID 361

Comment No mention is made at all of increasing the size of either James Paget or Norfolk & Norwich let alone build a new one to cope with a vast amount of admissions requiring doctors, nurses and administrative staff if your plan is reached – surely common sense dictates that hospitals must have and play a significant part in your strategy plan?

We have lost other amenities – police station, minor injuries units, Worlingham Primary School and now the well attended Phlebotomy Clinic is scheduled for closure. Where is the common sense in these closures when you want to increase the number of people so very locally?

Attached documents
1.0 Introduction

1.1 Thank you for consulting NHS England on the above emerging Local Development Plan (LDP) Document.

1.2 In reviewing the context, content and recommendations of the LDP Document and its current phase of progression, the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands & East (East) (NHSE) and Great Yarmouth and Waveney Clinical Commissioning Group (CCG).

1.2 Comments on the wider impact of planned growth on all local Health services and infrastructure needs to be co-ordinated through the Norfolk and Waveney Sustainability and Transformation Plan. The implementation of the plan will result in extensive transformation to the way that health and care services are delivered, potentially including changes to the physical infrastructure.

1.3 Through the Shape of the System and primary care strategies the CCG approved recommendations which changed and developed the health infrastructure provision for the population. So far this has seen the development of Kirkley Mill Campus in Lowestoft and Sole Bay Health Centre in Southwold. Community hospitals have been closed and investment made in community health and care services to provide care within the home setting as far as possible. Inpatient areas at Beccles Hospital have been extensively refurbished and an intermediate care service has commenced from April 2017. Out of hospital services will be rolled out to the South Waveney area during the financial year 2017/18.

2.0 Existing Healthcare Position in the Emerging Plan Area

2.1 The LDP Document covers the administrative area of Waveney.
2.2 Currently, within the administrative area, healthcare provision incorporates a total of 12 GP practices and 2 branch surgeries; 28 pharmacists, 14 dental surgeries and Beccles hospital.

2.3 These are the healthcare services available that this Local Development Plan must take into account in formulating future strategies.

2.4 Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services only. Existing GP practices in the area do not have capacity to accommodate significant growth.

2.5 In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes¹, within the GP Practices providing services in the area. [¹ The weighted list size of the GP Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.]

2.6 NHS England working with Great Yarmouth and Waveney CCG, NHS Property Services (NHSPS) and the Local Authority has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across Waveney. These projects vary in size and will initially deliver additional capacity to meet current planned growth requirements to 2021.

2.7 Optimal space standards are set for planning purposes only. This allows us to review the space we have available and identify the impact development growth will have in terms of capacity and service delivery. Space capacity deficit does not always prevent a practice from increasing its list size, however it may impact on the level and type of services the practice is able to deliver.

2.8 NHS England and the CCG are currently working together to help plan and develop new ways of working within our primary care facilities, in line with the Five Year Forward View, to increase capacity in ways other than increasing physical space. The Norfolk and Waveney Sustainability and Transformation Plan (STP) contains further detail on this and the 4 year Primary Care Infrastructure Funding programme that commenced in April 2015 will assist to provide funding and solutions for existing capacity issues nationally.
2.9 Existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this LDP document. The developments contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable.

3.0 Identification and Assessment of Policies and Strategies that have Healthcare Implications

3.1 In progressing the Waveney Local Development Plan (LDP), care should be taken to ensure that emerging policies will not have an adverse impact on health and care provision within the plan area and over the plan period.

3.2 In instances where major policies involve the provision of development in locations where healthcare service capacity is insufficient to meet the augmented needs, appropriate mitigation will be sought.

3.3 Policies should be explicit in that mitigation towards healthcare provision will be obtained and the Local Planning Authority will consider a development’s sustainability with regard to effective healthcare provision.

3.4 The exact nature and scale of mitigation will be calculated at the appropriate time, as and if schemes come forward over the plan period to realise the objectives of the LDP.

3.5 Before further progression and amendment of policies are undertaken, the Local Planning Authority should have reference to the most up-to-date strategy documents from NHS England and the CCG which currently constitute The Five Year Forward View and the STP.

3.6 Plans and policies should be revised to ensure that they are specific enough in their aims, but are not in any way prescriptive or binding on NHS England or the CCG to carry out certain development within a set timeframe, and do not give undue commitment to projects.

3.7 Notwithstanding this, there should be a reasonably worded policy within the emerging LDP that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration, extension or relocation of existing medical facilities. This positive stance should also be indicated towards assessing those schemes for new bespoke medical facilities where such facilities are agreed to in writing by the commissioner. New facilities will only be appropriate where they accord with the latest up-to-date NHS England and CCG strategy documents and are subject to the NHS England prioritisation and approval process.
3.8 We would like to highlight that in order for the NHS to introduce new ways of working and increase capacity in, and access to, primary care it is vital that our infrastructure is serviced by adequate public transport systems and communication infrastructure.

3.9 NHS England notes the requirement for Waveney District Council to deliver a plan for increased levels of housing growth for their area, resulting in approximately 9,019 new dwellings during the plan period 2014-2036 and have identified there will be a significant impact on health infrastructure arising from these proposals.

3.10 As stated above the exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and if schemes come forward over the plan period to realise the objectives of the LDP. Anticipated mitigation for each proposed area is detailed below, please note this is based on the current configuration of health care services and is subject to change:

Growth Area & Anticipated Proposed Dwellings

Based on Total housing growth 2014-2036 by settlement in emerging Local Plan

Anticipated Primary Care Mitigation

Lowestoft with Carlton Colville and Oulton

4,991 proposed new dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration, extension or possible relocation of one or more existing health facilities. In line with CCG Strategies.

A new build facility is planned in this area (Woods Meadow), anticipated completion after 2020. Rosedale Surgery is also planning for an extension to help accommodate its current demand. We also support the intention statement in the plan 'to manage and limit coalescence of the town with surrounding villages such as Blundeston, Corton, Hopton (in Norfolk) and Kessingland to ensure each settlement retains its individual identity'

Beccles and Worlingham

1,473 proposed new dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration, extension, or possible relocation. In line with CCG
Strategies.

Bungay

527 proposed dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration and/or extension. In line with CCG Strategies.

Halesworth and Holton

740 proposed dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration and/or extension. In line with CCG Strategies.

Southwold and Reydon

325 proposed dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration, extension, or possible relocation. In line with CCG Strategies.

Rural Areas

963 proposed dwellings

Contribution towards increasing capacity for local Primary Care facilities, by means of reconfiguration, extension, or possible relocation. In line with CCG Strategies.

3.11 NHS England and Great Yarmouth and Waveney CCG will have significant comments to make as details of specific developments become available. In order to provide a more detailed response, a clearer understanding of phasing is required of the multi-year developments.

3.12 Increase in the provision of assisted living and care homes although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the NHS, to plan and implement suitable mitigations.

3.13 It is also important we are consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.
4.0 Conclusions

4.1 This response follows a consultation by Waveney District Council on the Waveney Local Development Plan to 2036: First Draft Consultation.

4.2 In its capacity as Primary healthcare commissioner, NHS England has requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision and has responded with recommendations as to how policy should be shaped in the future.

4.3 NHS England has identified shortfalls in capacity at existing premises covered by the LDP. Provision needs to be made within the emerging LDP to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development.

4.4 The recommendations set out above are those that NHS England deem appropriate having regard to the projected needs arising from the emerging Waveney LDP. However, if the recommendations are not implemented then NHS England reserve the right to make representations about the soundness of the plan at relevant junctures during the adoption process.

Attached documents
Norfolk County Council Stephen Faulkner

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<tr>
<td>Comment ID</td>
<td>766</td>
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<td>Comment</td>
<td>It is felt that the emerging Local Plan should contain a policy on developer funding explaining how the impacts of the development proposed will be appropriately mitigated (i.e. through developer funding - either by Section 106 planning obligations and/or the use of the Community Infrastructure Levy (CIL). Moreover, it is felt that the supporting text should make it clear that where there is likely to be any cross-boundary impacts arising from development in Waveney District, that developer funding will be used to mitigate such impacts in line with the CIL Regulations (2010 as amended) i.e. Reg 122 (Legal Tests) and Reg 123 (Pooling Restrictions).</td>
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Attached documents
North Cove Parish Council Jayne Evans

Section  
Policy WLP1.4 - Infrastructure

Comment ID  
1271

Comment  
To be sustainable housing should be close to employment which should come first. There is a need for quality employment in the area.

Essential Infrastructure: It is pointless increasing the size of doctor's surgeries, schools and hospitals if it is impossible to attract doctors, nurses, teachers to the area to fill vacancies. Extra housing will just increase the pressure on already overstretched and exhausted staff.

Attached documents
Paul Lawrence

Section Policy WLP1.4 - Infrastructure

Comment ID 635

Comment Having considered the Waveney Local Plan, our concerns focus on the infrastructure needed to support the number of families and individuals who will be moving into the area.

If these communities are to flourish, the Council will need to provide: employment, schooling, improved transport networks, medical facilities and leisure opportunities.

We are particularly concerned about the impact on Lowestoft if these provisions are not put in place.

There is also a concern about the future of Beccles, currently a popular market town and tourist destination. Expansion in Beccles could have a detrimental impact on the town.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section Policy WLP1.4 - Infrastructure

Comment ID 1113

Comment Southern Relief Road

There has been concern expressed about drainage from where the Southern relief road joins London Road, particularly the risk of flooding towards and in Beccles and in the opposite direction to Church Lane and Cucumber Lane in Weston.

Increased traffic flow. There is concern once the Southern Relief Road is opened that there will be an increase in the flow of traffic using Cromwell Road and School Road in Ringsfield and through to Top Road in Ilketshall St Andrew. The road structure and width through residential areas is not ideal for faster traffic generally using the route as a short-cut and certainly would not be suitable for heavier vehicles. Whilst there has been some traffic surveillance along Cromwell Road and London Road, the Parish is requiring a commitment to set in place traffic calming measures to mitigate the negative impact of increased and faster traffic. Through Weston on London Road (A145), a speed limit of 50mph would be desirable heading away from and towards the proposed roundabout.

Attached documents
River Waveney Trust Andrew Mackney

Section Policy WLP1.4 - Infrastructure

Comment ID 911

Comment WLP1.4 Infrastructure

We welcome the requirement that developers should ensure there is adequate capacity in the water recycling centre and the wastewater network, but the policy should be re-worded to state that development cannot be started until improvement works are underway, and not simply that phasing 'may be' necessary.

Attached documents
Roger Woodard

Section Policy WLP1.4 - Infrastructure

Comment ID 136

Comment
After reading the proposed future development for the Waveney Area I am against the over development for houses and business areas. This is based on the very poor infrastructure across the Waveney area. There is a lack of good suitable road systems, alongside the lack of leisure facilities to serve especially the south of Lowestoft.

The area is now gridlocked at certain times of the day, especially in Oulton Broad and the adjacent arterial roads to it. This is already with the population that the area cannot cope with.

And as for the new bridge, well who when building a new structure would still have it as a single lane and a basule system. Anyone with imagination would have looked ahead for future demand and made it a spanned bridge with dual lanes. It will be to little to late therefore I am against this based on the reasons I have stated.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP1.4 - Infrastructure

Comment ID 1589

Comment • South Norfolk are broadly supportive of the approach to the provision of infrastructure in the plan and the need to provide three strategic pieces of infrastructure, the Lake Lothing Third crossing, the Lowestoft Flood Risk management Project and the Beccles Southern Relief Road. Of these, the Beccles Southern Relief Road will probably have the most direct impact on South Norfolk due to the proximity of Beccles to the South Norfolk Council area. Other key infrastructure projects outside the Waveney district are also noted, in particular improvements to the A47, which will directly impact parts of South Norfolk. Any other improvements to key roads (such as the A143) will need to be discussed regularly with South Norfolk Council during the production period for the two relevant Local Plans.

• As noted above South Norfolk Council would be keen to work with Waveney to improve rural broadband connection and speeds as this is key to facilitating sustainable development in rural areas.

Attached documents
Statuslist Limited (GVA Grimley Limited) -
Alison Wright

Section          Policy WLP1.4 - Infrastructure

Comment ID      1499

Comment          Policy WLP1.4 advises that developers must consider the infrastructure requirements needed to support and service the proposed development and all development will be expected to contribute towards infrastructure provision to meet the needs generated. The Policy also advises that off-site infrastructure will generally be funded by the Community Infrastructure Levy or any replacement.

Whilst our client supports Policy WLP1.4, it is important for the Policy to also acknowledge that development viability may result in reduced financial contributions to allow a scheme to be delivered. This is in line with guidance contained in the NPPF (paragraph 173) which specifically states that developments 'should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened'.

Attached documents
**Suffolk County Council Robert Feakes**

**Section**  
Policy WLP1.4 - Infrastructure

**Comment ID**  
1691

**Comment**  
Appropriate infrastructure is an essential component in the delivery of waste services. The majority of municipal household waste is now treated through the Suffolk Energy from Waste Facility or through a Materials Recycling Facility. A network of localised delivery points or Waste Transfer Stations is provided by Suffolk County Council to ensure the cost-effective movement of waste from where it is collected by the Waste Collection Authorities from households and businesses across the county to the treatment and recycling facilities. One of these Transfer Stations is located in Lowestoft and services the whole Waveney area. It is not envisaged that the developments outlined in the Waveney Local Plan will have any significant effect on the Suffolk Energy from Waste Facility or on the Lowestoft Transfer Station.

In addition, Suffolk County Council provides a network of 11 Household Waste Recycling Centres (HWRC) which serve the total population of Suffolk (325,000 households).

A Waste Infrastructure Board has been established to oversee the management of infrastructure projects and budgets. Priorities have been established where development is considered necessary across the county. HWRCs utilised by residents within the Waveney Local Plan area are located in Lowestoft and Leiston, as shown on the catchment area map below.[see attachment]

Although residents from only a few parishes tend to visit Leiston HWRC, further development in the southern part of Waveney District is very likely to increase demand on the Leiston facility, particularly in view of the expansion limitations at the Lowestoft HWRC. Waveney District Council should, therefore, be aware that CIL contribution may be requested to mitigate against overwhelming pressure on Lowestoft HWRC and to assist in future development of a new or improved HWRC in the Suffolk Coastal area. The adopted Developers Guide will assist in this regard.
Lowestoft – The HWRC here is under considerable pressure and already operating at capacity on several days. A project is underway to consider both policy options to improve throughput and also infrastructure improvements, including the potential provision of a re-use facility. The current estimate of infrastructure improvements is in the region of £1 million. The majority of new development identified in the Waveney Local Plan will result in considerable additional demand on the Lowestoft site and, therefore, as a minimum, contributions at the rate identified for upgrade/improvement projects would be anticipated.

Leiston – A project has already been established to consider future HWRC provision in this area. At the very least, future provision at the current site to accept additional waste from housing growth will necessitate improvements to access from the highway. Any additional demand on this site by new development should thus, as a minimum, attract contributions at the rate identified for upgrade/improvement projects.

Site Specific Requirements

The reference to making provision for bins as a design issues in Policy WLP8.29 is welcomed.

The references to minimising waste in construction and providing waste management facilities in Policy WLP8.28 is welcomed.

The District Council should consider including policy wording which would encourage and manage the provision of ‘bring sites’, where justified by virtue of the size of the development or the level of existing provision in the area. This could help reduce demand on HWRCs, as well as encouraging recycling. Bring Sites are generally located in publicly accessible areas and typically comprise a number of containers allowing separate collection of materials for recycling. The technical requirements for provision could be set out in specific waste guidance.

Attached documents
Health and Social Care

The National Planning Policy Framework states that Local Plans should take account of local strategies to improve health. The Joint Health and Wellbeing Strategy for Suffolk (refreshed in 2016) identifies four strategic outcomes with four cross-cutting themes. They are reproduced below [see attachment].

The planning system can support each of these outcomes and, by helping people to make healthier choices in their everyday lives, can help prevent poor health outcomes.

As noted in the Plan, Waveney is characterised by low levels of physical activity. The following is an overview of public health issues in the District, from the Public Health England Health Profile for 2017.

- Life expectancy is 10.0 years lower for men and 6.9 years lower for women in the most deprived areas of Waveney than in the least deprived areas.
- In Year 6, 20.6% (1 in 5) children are classified as obese.
- For adults, Estimated levels of adult excess weight and physical activity are worse than the England average.

More recently released data, held in the physical activity fingertips tool highlights that:

- In 2015/16 only 57.5% of Waveney adults were recorded as physically active (i.e. they meet the Chief Medical Officer’s guidelines for physical activity), this figure is significantly worse than the England values (64.9%)
- In 2015/16 over 1 in 5 adults in Waveney were classed as physically
inactive – similar to the England level of 22.3%

• 2013-2015 data indicates that 67.3% of adults in Waveney were classified as being overweight or obese (so 2 in 3!)

• 2015/16 data highlights that 26.4% of reception age children were overweight or obese.

• Additionally, the percentage of diabetics in Waveney was 7.2% in 2014/2015 higher than the England prevalence of 6.4%

This really highlights the need to promote physical activity in and around the Lowestoft area.

• The 2016 Annual Public Health Report for Suffolk [https://www.healthy-suffolk.org.uk/uploads/21991-APHR-2016-ONLINE.pdf] notes that low levels of physical activity can be a risk factor for mental ill health. Regular physical activity reduces the risk of depression, cognitive decline and dementia. It can enable a person to cope with stress better. Additionally, excess weight can make it more difficult for people to find and keep work, and it can affect self-esteem and mental health.

o Clinical Commissioning Group (CCG) data [https://fingertips.phe.org.uk/profile-group/mental-health/profile/common-mental-disorders/data#page/1/gid/8000026/pat/46/par/E39000031/ati/153/are/E38000063] for Great Yarmouth and Waveney CCG highlights that the prevalence of depression in 2015/16 was 9.2% for those aged 18+ registered with a GP – higher than England (8.3%)

o CCG dementia prevalence for Great Yarmouth and Waveney is also higher than national figures (1.0% prevalence vs 0.8% prevalence nationally in 2015/16)

Again, these factors reiterate the need for physical activity promotion.

This reinforces the need for the Plan to encourage walking and cycling – ensuring that services are well related to housing and giving priority to infrastructure for sustainable modes of travel.

In respect of the objectives in the Joint Health and Wellbeing Strategy:

Every Child in Suffolk has the best start in life

Education infrastructure is considered elsewhere. The Plan also makes provision for play space on allocated sites, with an overarching requirement
in WLP1.4. Safe walking and cycling routes will also help encourage children to exercise.

Improving independent life for people with physical and learning disabilities

The Plan includes provision for accessible housing in WLP8.1, but does not set a percentage requirement for homes built to M4(3) standard (wheelchair accessibility). The County Council would welcome the opportunity to discuss the methodology for identifying a suitable percentage.

Older people in Suffolk have a good quality of life

Policy WLP8.1 requires that 5% of new homes be built to M4(2) standard under the Building Regulations. The County Council would welcome the opportunity to discuss the methodology for selecting this percentage, as increasing the number of accessible homes gives a real opportunity to increase independence at home for an ageing population, whilst reducing care costs to individuals and the public purse.

The reference to dementia friendly design in paragraph 8.161 is welcomed. This is, in part, incorporated into Policy WLP8.29. The District Council may wish to further consider how design for an ageing population can be assessed and promoted. The Government's 'Lifetime Neighbourhoods' report offers another set of useful principles. The District Council may wish to consider codifying some of the key considerations, perhaps through supplementary design guidance.

The District Council's consideration of housing allocations specifically for older people is welcomed.

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

The built environment can influence mental health outcomes by encouraging physical exercise, encouraging feelings of safety, creating places which are open and offer access to natural and green space and by offering chances for social interaction. These principles are included in the Plan, but the District Council should consider whether Building for Life Guidelines are sufficient, or whether to produce more detailed local design guidance.

Refreshed-Strategy-for-Suffolk.pdf

Suffolk County Council Robert Feakes

Section Policy WLP1.4 - Infrastructure

Comment ID 1613

Comment Infrastructure and Delivery

Policy WLP1.4 requires the delivery of necessary transport infrastructure. Whilst it is correct that CIL will provide a mechanism for securing contributions towards much infrastructure, there is still a need to ensure that site specific impacts of development are mitigated. The policy states that, where infrastructure mitigation cannot be provided, development should not be permitted.

It would be useful for the policy, or perhaps supporting text, to provide more detail as to how the relationship between necessary, site-specific transport infrastructure (to be provided through planning obligations) and strategic transport infrastructure (arising from cumulative impacts and delivered through CIL) will be managed. This may necessitate reconsideration of the District Council's Regulation 123 List.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP1.4 - Infrastructure

Comment ID 1614

Comment Lake Lothing Third Crossing

The Lake Lothing Third Crossing represents a £100m investment in the town, and the Local Plan should fully explore the opportunities associated with the redistribution of traffic through, and around, Lowestoft. Such opportunities may arise at, for example, Station Square (due to the reduction of flows across the Bascule Bridge). The County Council therefore welcomes the first objective for central and coastal Lowestoft – set out on page 44 – to improve connectivity and permeability within the area.

The Third Crossing does create the potential for significant improvements to access and movement in the town, and the plan could go further in identifying transport and environmental improvements which could be enabled by delivery of the Crossing. The County Council would be pleased to consider potential measures, to be referenced in the Plan and delivered through Policy WLP2.1, alongside the District, and in consultation with partners such as Highway England.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP1.4 - Infrastructure

Comment ID 1615

Comment Primary and Secondary Education

The County Council has a legal duty to ensure proper provision of education from age 2 to 16. The National Planning Policy Framework establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward and in locating provision to minimise the need for travel.

Primary Education

Availability of places at primary schools across the District varies markedly. As provided during previous consultation stages and developed in the Draft Infrastructure Study (July 2017) it appears that the proposed distribution of housing can be managed in terms of additional school places, but in some areas it will take schools to the limits of their capacity and may involve finding places outside of the catchment primary school. Further growth (in addition to/outside of) this proposed distribution might not be manageable.

The following analysis is based upon the table beginning on page 15 of the draft Infrastructure Study, based on the policies in the First Draft Plan which sets out the distribution of housing. This is based on the County Council’s standard pupil yield of a minimum of 25 primary school aged children per 100 dwellings, and current forecasts of available capacity covering the school years 2016/17 to 2020/21.

It should be noted that these approaches are based upon school site sizes and government guidance on space requirements. As such, this strategy can only be considered indicative. These proposals have not yet been discussed with the schools themselves, and detailed consideration has not been given to the specifics of how schools could be remodelled.

Furthermore, this table [see attachment] does not take into account any current or forthcoming applications outside of the proposed allocations. These windfall sites may use up school capacity in an incremental manner.
before allocations are made.

New Primary Schools are planned for:

North Lowestoft Garden Village.

Existing Woods Meadow allocation.

Beccles and Worlingham Garden Suburb allocation.

The Street, Carlton Colville allocation.

Kirkley Waterfront & Sustainable Urban Neighbourhood.

Secondary Education (11 – 16)

The position as per the draft IDP (July 2017) is correct, but capacity at Benjamin Britten Academy and Ormiston Denes Academy is likely to be limited as the recent spike in the primary demographic moves through into the secondary phase. This is coupled with a desire from some schools in the area to reduce their Pupil Admission Number (PAN) for future years to reflect current numbers in the school rather than a longer term view of the forecasts.

East Point Academy is part of the Government rebuild programme, Priority Schools Building Programme, and is being rebuilt at a capacity to reflect the current size of the school intake rather than re-providing the existing capacity of the school. This new reduced capacity will therefore have to be considered in future discussions around the 1,437 dwellings allocated in the area. [see table in attachment]

Post-16 Education

Sixth Form provision is given by Lowestoft Sixth Form College, Bungay High School Sixth Form and Sir John Leman High School Sixth Form for the entire District. They offer courses at A-Level, GCSE and BTEC levels.

Further education is provided by East Coast College, which is a partner college of the University of Suffolk. The college offers qualifications at degree level. To estimate the number of new pupils that will result from the allocated development for each settlement, a standard value of 0.04 sixth form pupils from each new dwelling was used as per the Guidance adopted by both Waveney District Council and Suffolk County Council.

As the three sixth form colleges all cover the entire District, there is no way to split the estimated pupil yields from development into catchment areas.
Development across the whole District is predicted to produce a pupil yield of 236 new sixth form pupils over the course of the plan period. After consulting with Suffolk County Council, the current provision of sixth form education is considered to be sufficient to meet this need.

There is no set figure used to estimate the number of new further education pupils from new development. North Suffolk Skills Centre offers places for further education pupils.

Early Education

Early Education covers children aged between 2 and 5. The County Council has statutory duties to ensure a sufficiency of provision to meet demand, although provision is delivered by the market – with providers in the public, private and voluntary sector based on market demand. At present, eligible two year olds and all three and four year olds are eligible for 15 hours free provision per week. From September 2017, the three and four year old children of working parents are eligible for 30 hours a week free provision. It remains to be seen what the impact of this change will be, as not all parents will take up the additional provision.

The following table [see attachment] sets out additional dwellings by District electoral ward, current capacity, additional demand arising from development and a potential infrastructure solution.

The County Council wishes to discuss delivery of Early Years requirements, in particular the potential for allocations of land and revision to the Regulation 123 List, in order to ensure that necessary requirements arising from the Plan are delivered.

Suffolk County Council Robert Feakes

Section  Policy WLP1.4 - Infrastructure

Comment ID  1645

Comment  The Draft Infrastructure Plan identifies that improvements to libraries are required in order to mitigate the impacts of growth. Further discussion is required as to the specific projects which can be set out to provide the necessary capacity in library facilities. This may not require additional floorspace, rather better use of existing facilities.

Attached documents
**Suffolk County Council Robert Feakes**

<table>
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<tr>
<th>Section</th>
<th>Policy WLP1.4 - Infrastructure</th>
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<tr>
<td>Comment ID</td>
<td>1642</td>
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<tr>
<td>Comment</td>
<td>The published draft Infrastructure Plan identifies that the Suffolk Fire and Rescue Service does not envisage a need for any additional appliances or fire station capacity as a result of the development proposed in this Plan. This will be monitored during the lifetime of the Plan in case service requirements change.</td>
</tr>
</tbody>
</table>

**Attached documents**
UK Power Networks Peter Rye

Section Policy WLP1.4 - Infrastructure

Comment ID 1544

Comment

It is difficult for us to estimate capacity requirements without knowing the detail of the sites – housing (which is relatively predictable) varies significantly on the heating type as there is a lot of difference between traditional gas/oil heating and fully electric heating, and commercial type premises are even more variable as they can be anything from warehousing (which isn’t normally much more than lighting) to very power hungry applications such as data centres or cold stores. Therefore I’m afraid that we are not in a position to interpret your plans into capacity estimates - if you do not have the expertise to do this in-house then I’m afraid you would have to employ an electrical consultant to do this work for you.

To give you some guidelines, I would normally anticipate that any development up to 1 – 1.5MVA would be able to be connected to the local 11,000 volt network without requiring major works. Larger developments of circa 1.5-4MVA may be able to connect to the existing network, but some additional 11,000 cabling for circuit reinforcement work should be expected. Any developments totalling 5MVA or higher are likely to need new 11,000 Volt cabling to be laid to the nearest 'Primary' Substation. To give you an idea of the capacity available at our ‘Primary’ substations in the area, I have put together the table below [see attachment] – the yellow markers indicate capacity in the 3-6MVA range and the green markers indicate 7MVA+

Areas 3.1, 3.2 & 3.3 are fed from the 'Primary' Substations at Barsham and Beccles, which between them have circa 7MVA of capacity available, so there is no ‘primary’ capacity issue from our perspective – the issue is that to connect any significant additional demand the 11kV network will require reinforcement, and the cost of that has so far tended to put off potential developers, as it tends to require circa 2km new cabling. However, as the network is adequate for the existing demand there is no driver for us to fund any reinforcement.

The alternative option for this area would be to establish a new 'Primary'
substation at Ellough Airfield, but the cost of that would be significantly higher than the cost of reinforcing the 11kv network from Beccles / Barsham, especially as circa 1km new 11kV cable would still be required.

It is possibly worth mentioning here that our only source of reinforcement funding comes from the electricity bills of all existing customers, and it is currently the opinion of Ofgem (who regulate the industry) that it is not appropriate for these funds to be used to create capacity for new development. The 'connection charging policy' is agreed with Ofgem on a national level, and can be downloaded from our website:

Developers can request asset information for an individual site via our website, but to extract this information for all your development sites would involve a significant amount of work, and I will have to make further enquiries about this as it therefore may not be something that we could provide free of charge. If any of our assets need to be moved, then an application would have to be made for each affected site. However, some assets may not be able to be moved (for example the cable tunnel under lake lothing and the cables therein) and there may be costs involved with moving those that can be.

Attached documents

Watts

Section Policy WLP1.4 - Infrastructure

Comment ID 247

Comment If the extra housing added to a town is made up of many small developments instead of larger developments, how will the infrastructure charges for these be grouped together to pay for extra green space, leisure facilities, healthcare facilities, water, sewerage, flood prevention etc.?

Attached documents
Strategy for Lowestoft

Andrew Stewart

Section Strategy for Lowestoft

Comment ID 833

Comment The high street in Lowestoft is struggling and suffers from unoccupied units and too much low quality retail. It looks shabby and access is difficult. As the hub of the town urgent action is need to revitalise the town centre to bring in more business, a better tourism offering and a greater sense of community. Out of town retail units are driving trade away from the centre and dispersing the potential trade while increasing traffic congestion. There are insufficient car parks close to the centre and the link between the high street and the beach area is unappealing, noisy, and polluted with the old tourist office building now in the middle of a windswept desert of concrete. It is suggested that a priority for the Council should be on residential expansion in existing brownfield sites close to the centre if possible and looking for opportunities to invigorate the town centre while minimising the drift towards inner urban retail park type offerings. Making the town a more appealing tourist venue is an important growth opportunity in view of the natural benefits enjoyed by the town and local unemployment issues, aspects of the Southwold success story could be replicated in the southern beach area of the town.

Attached documents
Ben Falat

Section
Strategy for Lowestoft

Comment ID
590

Comment
Not sure where I should put this comment since it refers to a potential development site which has simply not been considered.

Neeves Pit area encircling a small set of Allotments, north of Normanston Drive and parallel to Higher Drive: this area is a former "Corporation Yard". As such there may well be some contamination of the grounds due to corporation dumping, however there exists considerable potential for housing and park amenity with some of it wooded (but unmanaged) existence of a pond and the allotments. There is already unadopted access to this site from Normanston Drive.

Attached documents
## Broads Authority Natalie Beal

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### Comment

2.3 Is an issue to consider that the new development needs to support the Town Centre and existing facilities? On page 15, regarding Lowestoft it says 'The town centre has suffered in recent years with higher levels of vacant shop units and residents consider that the shopping offer could be better'. Also is the issue of the urban extensions not integrating with the existing community a consideration?
David Henwood

Section Strategy for Lowestoft

Comment ID 523

Comment I understand with talking to the planning officer at the meeting at the Lowestoft Library on Saturday 02.09.2017, that there is apparently a need to build some 500 plus homes in the Oulton / Lowestoft area before 2020, and that a lot of this need is to accommodate the migration from other areas in the country to the Lowestoft area, if this is indeed the case this means we are effectively building houses to accommodate people not from this area, which seems completely wrong to me, this will in effect drive the cost of houses spiralling upwards and the local people will not be able to afford these houses should there be any left for them to consider purchasing.

Attached documents
**Forcecore Limited (Wheatman Planning Ltd) A Darling**

Wheatman Planning Ltd. (Deirdre Linehan)

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| Comment ID | 1197 |

**Comment**

At the outset however we wish to object to the strategy taken by the District Council towards the allocation of sites for residential development. We consider that the Council are placing over reliance on large allocations with insufficient opportunities for a constant flow of development from mid range sites. The Council are proposing to allocate two large sites on the edge of Lowestoft to the North and South (WLP2.12 and WLP2.15) which combined will provide a total of 2200 dwellings when fully developed. Judging however from the supporting text accompanying both of these allocations there is likely to be a long lead in period before either of these sites are developed and begin to contribute to housing need.

With regard to WLP2.12 North Lowestoft Garden Village this is the largest of the allocations and comprises 77.6 ha expected to deliver up to 1400 homes. The accompanying text however highlights that this allocation is a longer term ambition and development is not likely to start until 2026. At best just over half of the projected housing numbers will be delivered during the lifetime of the plan with the remainder being delivered between 2036 and 2044. In para 2.70 the Council acknowledges that "Access to the site is a constraint...". Initial phases of development can be accessed from the existing road network but later phases will require access from the A47 which is recognised as posing safety issues that will need to be mitigated against. The site is also one which is likely to be developed by more than one developer. Other issues that require additional investigation/consideration include potential effect on the setting of listed buildings, high potential for archaeology with a red/amber response from SCC archaeology and an intermediate pressure gas main running through part of the allocation.

Moving onto WLP2.15 Land South of The Street Carlton Colville this site comprises of 54.88 ha and is expected to deliver 800 houses as well as a new primary school, open space, country park and some local shops. The
accompanying text to this allocation however identifies a number of constraints to development including part of the site being in flood zone 3, impact on a scheduled ancient monument found within the site, high potential for archaeology, access issues and existing public rights of way.

As with WLP2.12 some of the constraints that have been identified for these allocations particularly the potential for archaeology and resolving access and drainage issues could limit both the start of development, in coming to an acceptable solution towards resolving these issues, and also the final numbers delivered from this site.

This is a relatively simple assessment of the two main allocations in Lowestoft based on the information provided in the First Draft Plan but it highlights the potential for both of these site to have delays in coming forward for development. There is also the likelihood that in overcoming some of the potential constraints both of these sites may not deliver the number of dwellings predicted within the plan.

The issue of over reliance on large allocations for mixed use developments is a feature common to many local authorities and is certainly one which Waveney District Council is familiar with. The land forming the Woods Meadow site for example was allocated in the 1996 Waveney Local Plan but only began to deliver housing during 2015 almost 20 years later. Similarly some of the larger allocations included within the current local plan have not yet delivered housing e.g. Kirkley Waterfront. Furthermore given the constraints that exist on some of the sites that are included within the Kirkley Waterfront Action Area Plan it could yet be some time before there is any housing delivery from this allocation.

There is therefore a concern that the strategy being taken by the Council will see the shortfall in the delivery of housing continue during the new Local Plan period. This scenario is particularly true for south Lowestoft and Carlton Colville where no other allocations are proposed apart from WPL2.15 Land South of the Street Carlton Colville. Should there be any delays in bringing this site forward, and the issues within the sites comprising Kirkley Waterfront remain unresolved, there could be a very real issue with the supply of new housing stock, including Affordable Housing over the next number of years. This a scenario that the Council appear to have completely ignored and are ill prepared for in the strategy for housing delivery proposed by the new Local Plan.

The Waveney 5 year Supply of Housing Report as at March 2016 provides details of housing delivery for each financial year commencing 2001/02
until 2015/16. The annual housing requirement for the local plan period is identified as 290 dwellings per year. In the early years housing delivery was extremely successful and for a number of years exceeded the annual requirement and a surplus of 754 dwellings was achieved, based largely on earlier Local Plan greenfield allocations. Subsequently, apart from the 2007/08 financial year, the delivery of housing dropped dramatically and for several years the number of dwellings completed has been less than half the annual requirement with 2014/15 and 2105/16 seeing only 135 and 136 completions respectively. This is despite assurances to the contrary given by the Council at planning appeals over the last 4 years or so. This situation has now completely depleted the early surplus achieved and as at March 2016 there was a deficit of 43 dwellings in terms of the overall cumulative target set under the CS. This in part has contributed to the annual housing target within the new Local Plan being set at 374 dwellings, with a 5% buffer being added in acknowledgement of the under-provision that has occurred in recent years. It would be overly simplistic to attribute this situation entirely to over-reliance on large allocations and the difficulties that can be experienced in bringing these sites forward. What can be said however is that without including smaller and more readily achievable sites within the allocations there is the likelihood the Council will find the current situation i.e. a deficit of delivery in relation to the annual housing target, continuing over the period of the new Local Plan. This could easily lead to a situation where the council becomes the target of random applications on less suitable sites which they may struggle to defend themselves against.

The draft housing White Paper "Fixing our Broken Housing Market" (Feb 2017), identifies amongst other issues that there are insufficient houses being built to meet local need. In the report the Government examines the ways in which increasing the supply of housing can be tackled and has set a clear target for all Local Authorities to have up to date local plans in place which allocate sufficient land to meet local housing needs. Included within the List of Proposals found on page 18 of the report is "Making more land available for homes in the right places ... releasing more small and medium sized sites." Para 1.29 on page 25 states "Policies in plans should allow a mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector." One of the means identified for improving the housing market is to provide additional support for small and medium sized builders.

While it is acknowledged that the Housing White Paper is only in draft form it is considered that it provides a clear indication of the way in which the
Government wishes Local Authorities to respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the First Draft Plan has paid insufficient regard to this advice in not allocating sufficient small and medium sized sites such as that put forward by our client.

• The site measures approximately 0.93ha and is well related to the existing urban edge and built up area of North Lowestoft being substantially surrounded by existing development to the north, east and south. The A47 Yarmouth Road extends along the western boundary of the site. The development of this site therefore represents a rounding off of development within the urban area.

• The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy walking distance of the site. • The site is in single ownership and is readily available for development. These are critical considerations particularly when it is well known that sites which are in multiple ownership can often be a constraint to delivery.

• The site is not constrained in anyway by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development. A scheme can be designed to take account of the trees on-site, as acknowledged by the earlier WDC assessment.

• Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

G Youlden
Wheatman Planning Ltd. (Deirdre Linehan)

Section
Strategy for Lowestoft

Comment ID
1191

Comment
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accompanying text to this allocation however identifies a number of constraints to development including part of the site being in flood zone 3, impact on a scheduled ancient monument found within the site, high potential for archaeology, access issues and existing public rights of way.

As with WLP2.12 some of the constraints that have been identified for these allocations particularly the potential for archaeology and resolving access and drainage issues could limit both the start of development, in coming to an acceptable solution towards resolving these issues, and also the final numbers delivered from this site.

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There is therefore a concern that the strategy being taken by the Council will see the shortfall in the delivery of housing continue during the new Local Plan period. Should there be any delays in bringing this site forward, and the issues within the sites comprising Kirkley Waterfront remain unresolved, there could be a very real issue with the supply of new housing stock, including Affordable Housing over the next number of years. This a scenario that the Council appear to have completely ignored and are ill prepared for in the strategy for housing delivery proposed by the new Local Plan.

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extremely successful and for a number of years exceeded the annual requirement and a surplus of 754 dwellings was achieved, based largely on earlier Local Plan greenfield allocations. Subsequently, apart from the 2007/08 financial year, the delivery of housing dropped dramatically and for several years the number of dwellings completed has been less than half the annual requirement with 2014/15 and 2105/16 seeing only 135 and 136 completions respectively. This is despite assurances to the contrary given by the Council at planning appeals over the last 4 years or so. This situation has now completely depleted the early surplus achieved and as at March 2016 there was a deficit of 43 dwellings in terms of the overall cumulative target set under the CS. This in part has contributed to the annual housing target within the new Local Plan being set at 374 dwellings, with a 5% buffer being added in acknowledgement of the under-provision that has occurred in recent years. It would be overly simplistic to attribute this situation entirely to over-reliance on large allocations and the difficulties that can be experienced in bringing these sites forward. What can be said however is that without including smaller and more readily achievable sites within the allocations there is the likelihood the Council will find the current situation i.e. a deficit of delivery in relation to the annual housing target, continuing over the period of the new Local Plan. This could easily lead to a situation where the council becomes the target of random applications on less suitable sites which they may struggle to defend themselves against.

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While it is acknowledged that the Housing White Paper is only in draft form it is considered that it provides a clear indication of the way in which the Government wishes Local Authorities to respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the
First Draft Plan has paid insufficient regard to this advice in not allocating sufficient small and medium sized sites such as that put forward by our client.

- The site has an area of approximately 1.25ha and is well related to the existing urban edge and built up area of North Lowestoft being substantially surrounded by existing development to the east, west and south. The development of this site therefore represents an opportunity for development within the urban framework of the town, without an excursion into open countryside.

- The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy walking distance of the site.

- The site exhibits all the locational factors identified for the proposed allocation WLP2.13 (Land North of Union Lane), in particular:

"The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is not used for agriculture."

- The site is in single ownership and is readily available for development. These are critical considerations particularly when it is well known that sites which are in multiple ownership can often be a constraint to delivery.

- The site is not constrained in anyway by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development.

- Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

Attached documents
Hopkins Homes Christopher Smith  
Armstrong Rigg Planning (Geoff Armstrong)

Section: Strategy for Lowestoft

Comment ID: 1460

Comment: Strategy for Lowestoft – Object

Emerging Policy WLP1.1 proposes to allocate 55% (4,991 new homes) of the total growth planned for the district to Lowestoft. It states at paragraph 1.19 that:

"Byallocating just over half of future development to Lowestoft, the strategy reflects the role of Lowestoft as the largest town in the District and its potential for future economic growth. It enables a continuing focus on regeneration of the central areas of the town whilst allowing for some sustainable extensions for the town. With the majority of development allocated to the largest settlement, the need for travel should be minimised. This strategy also recognises Lowestoft Town Centre as the main town centre within the District catering for the town's needs and some of the needs of the rest of the District."

The proposed focus on the urban regeneration of Lowestoft is a laudable ambition that should be supported in principle. However, we consider the current level of development proposed for the town to be both overly optimistic, unrealistic and undeliverable during the plan period.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section Strategy for Lowestoft

Comment ID 1462

Comment We consider the Council’s approach to development in the wider Lowestoft area to be counterproductive if the aim is to try and secure the redevelopment of ex-industrial brownfield land within the town. The Council’s current preferred approach focuses efforts on encouraging the redevelopment of significant brownfield sites within the town, while also allowing largescale greenfield urban extensions totalling 2,540 new homes (Policies WLP2.12, WLP2.13, WLP2.14, WLP2.15). Developing greenfield land is significantly cheaper and easier than redeveloping ex-industrial sites and by allowing such largescale urban extensions, the Council will simply encourage developers to focus their efforts on these more profitable sites. We consider there to be insufficient demand for new homes in Lowestoft to support the quantum of development proposed and allowing greenfield sites to come forwards will therefore constrain delivery in more complicated and expensive brownfield locations.

On the basis of the above, we recommend that the Council needs to refine its approach to development in Lowestoft. If it is serious about encouraging the regeneration of the urban area, it needs to refocus the additional development that can’t be met on brownfield sites to other areas of the district where largescale housing development will not constrain the delivery of brownfield sites within Lowestoft. We consider the market towns, and in particular Halesworth, but also Southwold and Reydon, to be the most sustainable location for this additional growth.

Attached documents
Lowestoft Town Council Shona Bendix

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| Comment | One overall problem we at the LTC had was that the WDC maps and data for "Lowestoft" included the parishes of Oulton Broad, Oulton, Carlton Colville and other areas that aren't in the Lowestoft parish. This treated "Lowestoft" as a type of overall metropolitan area and so it's difficult to disaggregate what actually effects Lowestoft and what will affect the other parish councils.

We at the LTC note that other areas (Beccles, for example) don’t have this confusion and can thus know when a data point, such as the number of additional care home spaces needed, really applies to them or not. |

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M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section  Strategy for Lowestoft

Comment ID  929

Comment  Paragraph 2.3 states that avoiding coalescence, including between Lowestoft and Corton is to be limited. The scale of development means that any scope to extend the settlement of Corton itself would be unreasonably constrained.

Attached documents
Mervyn Wooltorton

Section  Strategy for Lowestoft

Comment ID  1281

Comment  As a longstanding resident of Oulton Village, and living within 100m of one proposed development site (WLP2.14) I write to object in the strongest terms to the proposals for Oulton contained within the Waveney Local Plan. The plan blatantly contradicts the government's own policies in particular those relating to Neighbourhood plans and development.

As you are aware Oulton Village embarked on the development of a Neighbourhood Plan, compliant with government policy, the Neighbourhood Plan allows residents of the village to have a say on future development including new housing, commercial property and infrastructure. Waveney District Council has over the last 3 years supported the development of the Oulton Village Neighbourhood Plan both financially and with assistance from council officers. The plan is in the late stages of completion having received input from the residents on their wishes and aspirations for the future development of the village.

Why did the residents bother? It is clear that the planners within WDC have a total disregard of government policy regarding the concept of Neighbourhood Plans and the wishes of the residents and have themselves managed a complete 180 degree turn around on their own planning policies.

Attached documents
Michael Kersting

Section Strategy for Lowestoft

Comment ID 440

Comment Why are current plans for Lowestoft concentrating on building many more houses, way out of proportion of any new employment in a currently chronically underemployed town? Who will be paying for this new housing and who needs it?

Attached documents
Oulton Neighbourhood Plan Steering Group Ann O'Callaghan

Section Strategy for Lowestoft

Comment ID 1269

Comment The Oulton Parish Neighbourhood Plan Steering Group would like to register their comments with regard to the above consultation.

Getting to this stage has not been without its difficulties and has been wholly worked on by volunteers trying to cover a Parish with approximately 2,000 homes.

For nearly 4 years we have been working on a neighbourhood Plan for Oulton culminating in the delivery and collection of a questionnaire based on the Local Plan in place at this moment.

We believe that the consultation document does not take into account the time spent on trying to develop a Neighbourhood Plan for Oulton nor does it give consideration to the fact that the consultation commenced immediately after the collection of the completed questionnaires and the message we gave to the community that the concept of these Neighbourhood Plans was to give communities the opportunity to have their say in the future development of their areas.

We believe the addition of proposed housing land within the Oulton neighbourhood plan designated area in the consultation has severely undermined the commitment made to the parishioners of Oulton by the steering group and the Parish Council that they would have, for the first time, the ability to help formulate a plan that included the requirement for housing and relevant services.

There is already disquiet within the community about the Woods Meadow development which when completed will have in excess of 800 new homes whose residents will need to use the existing services. There is great concern by the Parish Council about the extra burden that will be placed on the road infrastructure especially in the Hall Lane area. It is therefore the belief that it would be wise to not make a decision on any new development land until the impact of the Woods Meadow development is
complete. We are not aware of any other Parish that currently has an existing plan for such a large number of new homes and before completion of these to be faced with new plans for an extra 340+ within the parish boundary. With these concerns in mind we point out the inconsistency within the local plan compared to other areas.

Policies WLP7.3 & 4

7.19 During the first half of the plan period the redevelopment of the former Blundeston Prison site will deliver a significant amount of new housing in the village to meet local needs as well as a pre-school, retail and employment units. The strategy for Blundeston is therefore to allocate a small amount of additional development to be delivered only once the Blundeston Prison development is complete in order to enable the community to accommodate this growth and reduce the potential impact on the character of the village. The significant number mentioned is 140, yet Woods Meadow has upwards of 800 being built so why do you not think it appropriate in Oulton to 'enable the community to accommodate this growth and reduce the potential impact on the character of the village' as you feel is necessary for Blundeston?

With regard to Kessingland, acknowledging they are in the enviable position to have completed their NP, similar terms are being used in regard to their Neighbourhood Plan housing proposals. Policy SA2 7.39 Kessingland has recently prepared a Neighbourhood Plan which was 'made' by Waveney District Council in January 2017. The Neighbourhood Plan sets out a vision and strategy for the village which the District Council strongly supports. The Neighbourhood Plan allocates 3 sites for housing, totalling 105 houses. The Neighbourhood Plan also allocates land for an Early Years Centre and a care facility. All allocations are shown on the Policies Map.

7.40 Given the significant levels of housing allocated by the Neighbourhood Plan which will help support and enhance service provision in the village, it is not considered necessary to allocate further development to Kessingland in this Local Plan. Again we point to the term 'significant level of housing allocated' which in this case is 105. We recognise as well that Kessingland has just slightly more homes (2147) than in Oulton yet once the Woods Meadow is completed the Parish of Oulton will be the largest village with over 2,800 properties and should you achieve your aim of an extra 340, over 3,100.

It is abundantly clear that you have not considered Oulton in the development of your local plan in the same manner as other areas.
throughout your consultation document. It also appears that with the inconsistencies with other areas within the local plan that you are attempting to use Oulton for a 'significant' number of new homes on top of the 800+ at Woods Meadow before the implementation of our neighbourhood plan.

The brief that the Steering Group has been following as part of the Oulton Neighbourhood Plan is to look at possible new housing developments within the Parish and from the responses within the questionnaire (855) it is clear that the residents of Oulton do recognise that there is a need for more homes – but to give credibility to the process of developing a Neighbourhood Plan, which is the Government's intention, we need to show the residents of Oulton that their views will be taken on board.

To that end we respectfully request that as the Parish of Oulton has been preparing a Neighbourhood Plan for nearly 4 years, that to allow this to continue, the Steering Group, Parish Council and residents request the areas of land being considered within the Parish of Oulton boundary in the Local Plan consultation document to be ring fenced and taken out of consideration at this stage pending the completion of the Oulton Neighbourhood Plan.

We have met with Peter Aldous MP and raised our concerns on this matter and have also discussed with the officers the same concerns at a meeting in early August.

Attached documents
Oulton Parish Council Lynne Ward

Section Strategy for Lowestoft

Comment ID 1070

Comment Conclusions

Oulton Parish Council always wish to keep progress in the Village Moving Forward as we realise a village will die if no action is taken to keep it growing which is why the parishioners started the Village Neighbourhood Plan under the guidance of Waveney District Local Council. The main reason for this was to help control our growth with infrastructure we have, and to signal to interested parties of our desire to develop accordingly. The Draft Plan is fraught with danger to Oulton Village existence and we feel that once again local input is not being heard, we’ve had our say many times with local council and developers which unfortunately has fell on deaf ears, because we feel local knowledge just doesn't get the full attention it deserves.

Attached documents
Oulton Parish Council Lynne Ward

Section
Strategy for Lowestoft

Comment ID
1069

Comment
Woods Meadow Development

With the ongoing development with many issues not resolved, I.e. 50 acre Country Park, Contaminated Land we believe the village will not survive another influx of 340 houses, the Neighbourhood Plan was started to allow the village to expand in a fashion to suit our infrastructure and for the Parishioners to take more control of their destiny of the Village, encouraged by the Main Government and Local Councils with Localism in mind and considerable Public funds to do so. The Draft Plan is a heavy blow for all the hard efforts the parishioners put into taking the village Plan forward only it seems to be overridden, the Parish Council feel the Oulton Neighbourhood Plan is at the critical stage and should be allowed to come to fruition and so should be taken into consideration.

Attached documents
Richard Willsher

Section Strategy for Lowestoft

Comment ID 708

Comment the plans laid out are very incredible, but there is no entertainment in the plan we will need nightclubs and local facility’s IE paintball/air soft parks with play areas etc without this facilities the town trouble will only increase with boredom moff having jobs and homes is one thing but we need to let our hair down at the weekend.

in 80/90 this Town had an excellent night life and plenty off visitors coming into the town to in joy our facilitates, we all want a lowestoft for the futer off our chilrend.
Stacy Goddard

Section                       Strategy for Lowestoft

Comment ID                    367

Comment                      340 new homes surrounding union lane

I hereby give my objections to the unreasonable amount of new homes you are proposing to add to Lowestoft.

Firstly, I would like to bring my children up in a fairly safe environment and be able to cross the roads to take them to the park at Oulton. I find this task difficult enough crossing a zebra crossing 'ment' for 20 mph only traffic to stop, especially when seeing a mum with two children and a dog. The amount of traffic that does not stop, speed & huge lorries that still use this route needs addressing. The thought of what 340 new houses to this area will bring, truly horrifies me.

Currently my children go to Blundeston Primary (woods Loke school full at the time) which means I have to travel everyday using a 'blackspot' road. My son will in 2 years go to the local high school and bike over an already busy crossing at Aldi. Again what traffic will 340 houses bring to the area?

The doctors surgery at Oulton was up for sale for no doctors to take over, your paper explains a new surgery is to open over the new meadow development. The current sugeries have no knowledge on this and are very over prescribed please explain the situation 340 houses with people wanting a doctors surgery will do when no new doctors are available?

The sewerage and drainage really must be addressed too as this area is a cause for concern.

My disappointment is the sad fact the council are willing to hand over planning on a beautiful green area used by the barn owl, muntjac, hedgehogs, bats, house Martins, water vole & much more wildlife and also a heritage site.

This is classed a 'village' but will be turned into a huge housing estate if this planning application is to be given the green light. The severe lack of beauty
in the houses to come will detriment the area severely and with only still 2 crossings to the south we could be shut off and lose those with work, rather than add to employment.

Until a third crossing is well established the answer to the Government on allocation of finding new & green spaces for development should be a firm no.

I look forward to your reply

Attached documents
Warnes & Sons LTD  B Warnes
Wheatman Planning Ltd. (Deirdre Linehan)

Section  Strategy for Lowestoft

Comment ID  936

Comment  At the outset however we wish to object to the strategy taken by the District Council towards the allocation of sites for residential development. We consider that the Council are placing over reliance on large allocations with insufficient opportunities for a constant flow of development from mid range sites particularly in south Lowestoft. The Council are proposing to allocate two large sites on the edge of Lowestoft to the North and South (WLP2.12 and WLP2.15) which combined will provide a total of 2200 dwellings when fully developed. Judging however from the supporting text accompanying both of these allocations there is likely to be a long lead in period before either of these sites are developed and begin to contribute to housing need.

With regard to WLP2.12 North Lowestoft Garden Village this is the largest of the allocations and comprises 77.6 ha expected to deliver up to 1400 homes. The accompanying text however highlights that this allocation is a longer term ambition and development is not likely to start until 2026. At best just over half of the projected housing numbers will be delivered during the lifetime of the plan with the remainder being delivered between 2036 and 2044. In para 2.70 the Council acknowledges that "Access to the site is a constraint...". Initial phases of development can be accessed from the existing road network but later phases will require access from the A47 which is recognised as posing safety issues that will need to be mitigated against. The site is also one which is likely to be developed by more than one developer. Other issues that require additional investigation/ consideration include potential effect on the setting of listed buildings, high potential for archaeology with a red/amber response from SCC archaeology and an intermediate pressure gas main running through part of the allocation.

Moving onto WLP2.15 Land South of The Street Carlton Colville this site comprises of 54.88 ha and is expected to deliver 800 houses as well as a
new primary school, open space, country park and some local shops. The accompanying text to this allocation however identifies a number of constraints to development including part of the site being in flood zone 3, impact on a scheduled ancient monument found within the site, high potential for archaeology, access issues and existing public rights of way.

As with WLP2.12 some of the constraints that have been identified for these allocations particularly the potential for archaeology and resolving access and drainage issues could limit both the start of development, in coming to an acceptable solution towards resolving these issues, and also the final numbers delivered from this site.

This is a relatively simple assessment of the two main allocations in Lowestoft based on the information provided in the First Draft Plan but it highlights the potential for both of these sites to have delays in coming forward for development. There is also the likelihood that in overcoming some of the potential constraints these sites may not deliver the number of dwellings predicted within the plan.

The issue of over reliance on large allocations for mixed use developments is a feature common to many local authorities and is certainly one which Waveney District Council is familiar with. The land forming the Woods Meadow site for example was allocated in the 1996 Waveney Local Plan but only began to deliver housing during 2015 almost 20 years later. Similarly some of the larger allocations included within the current local plan have not yet delivered housing e.g. Kirkley Waterfront. Furthermore given the constraints that exist on some of the sites that are included within the Kirkley Waterfront Action Area Plan it could yet be some time before there is any housing delivery from this allocation.

There is therefore a concern that the strategy being taken by the Council will see the shortfall in the delivery of housing continue during the new Local Plan period. This scenario is particularly true for south Lowestoft and Carlton Colville where no other residential allocations are proposed apart from WPL2.15 Land South of the Street Carlton Colville. Should there be any delays in bringing this site forward, and the issues within the sites comprising Kirkley Waterfront remain unresolved, there could be a very real issue with the supply of new housing stock, including Affordable Housing over the next number of years. This a scenario that the Council appear to have completely ignored and are ill prepared for in the strategy for housing delivery proposed by the new Local Plan.

The Waveney 5 year Supply of Housing Report as at March 2016 provides
details of housing delivery for each financial year commencing 2001/02 until 2015/16. The annual housing requirement for the local plan period is identified as 290 dwellings per year. In the early years housing delivery was extremely successful and for a number of years exceeded the annual requirement and a surplus of 754 dwellings was achieved, based largely on earlier Local Plan greenfield allocations. Subsequently, apart from the 2007/08 financial year, the delivery of housing dropped dramatically and for several years the number of dwellings completed has been less than half the annual requirement with 2014/15 and 2105/16 seeing only 135 and 136 completions respectively. This is despite assurances to the contrary given by the Council at planning appeals over the last 4 years or so. This situation has now completely depleted the early surplus achieved and as at March 2016 there was a deficit of 43 dwellings in terms of the overall cumulative target set under the CS. This in part has contributed to the annual housing target within the new Local Plan being set at 374 dwellings, with a 5% buffer being added in acknowledgement of the under-provision that has occurred in recent years. It would be overly simplistic to attribute this situation entirely to over-reliance on large allocations and the difficulties that can be experienced in bringing these sites forward. What can be said however is that without including smaller and more readily achievable sites within the allocations there is the likelihood the Council will find the current situation i.e. a deficit of delivery in relation to the annual housing target, continuing over the period of the new Local Plan. This could easily lead to a situation where the council becomes the target of random applications on less suitable sites which they may struggle to defend themselves against.

The draft housing White Paper "Fixing our Broken Housing Market" (Feb 2017), identifies amongst other issues that there are insufficient houses being built to meet local need. In the report the Government examines the ways in which increasing the supply of housing can be tackled and has set a clear target for all Local Authorities to have up to date local plans in place which allocate sufficient land to meet local housing needs. Included within the List of Proposals found on page 18 of the report is " Making more land available for homes in the right places ... releasing more small and medium sized sites." Para 1.29 on page 25 states " Policies in plans should allow a mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector." One of the means identified for improving the housing market is to provide additional support for small and medium sized builders.

While it is acknowledged that the Housing White Paper is only in draft form
it is considered that it provides a clear indication of the way in which the Government wishes Local Authorities to respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the First Draft Plan has paid insufficient regard to this advice in not allocating sufficient medium sized sites such as that put forward by our client.

We consider sound planning arguments were set out in the earlier submissions that were made in response to the "Call for Sites" and the "Issues and Options" consultations undertaken by WDC during 2015 & 2016 which lent strong support to the site being included within the new Local Plan as a residential allocation. To summarise the favourable points that were made include the following:

• The site is well related to the existing urban edge and built up area of Carlton Colville. It will round off the exiting line of development that extends along the western boundary of the site in line with Carlton Colville Community Centre and the associated playing fields immediately to the north of the site and residential development found off Secret Close and Fairhead Loke to the South of the site.

• The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy walking distance of the site.

• The site is in single ownership and is owned by an established and reputable local builder. It has been unused for over 10 years and is readily available for development. These are critical considerations particularly when it is well known that sites which are in multiple ownership can often be a constraint to delivery.

• The site is not constrained in anyway by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development.

• Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

Attached documents

Lowestoft Infrastructure

Adam Robertson

Section Lowestoft Infrastructure

Comment ID 1205

Comment I agree there needs to be new housing within Waveney, especially Lowestoft. It is clear that young people are struggling to get onto the housing ladder, due to the rise in property prices, which is partly due to the lack of supply, for the demand created. We have to address this equilibrium.

However, there needs to be proper infrastructure in place, with the new houses. For example, in Carlton Colville, we have seen flooding partly due to poor planning management by building on a former lake, where The Mardle was. Indeed, the Kirkley Stream flooding of July 2015, was exacerbated because of the growth of housing, without the right infrastructure in place. We have seen the wrong pipes being used to drain away water, when there is heavy rainfall in Carlton Colville. This will need to remedied before any new housing is in place.

In terms of a new school in Carlton Colville, I believe this needs to be looked at and whether the viability is there. Suffolk County Council have failed to provide any adequate solutions to the congestion issue at Carlton Colville Primary School, despite a local District Councillor and the Town Council, providing a solution to the problem.

Attached documents
Adam Robertson

Section  Lowestoft Infrastructure

Comment ID  1206

Comment  In terms of transport in Lowestoft, the following points need to be considered:

1) Lake Lothing Third Crossing: I agree that there has been some progress made regarding the Third Crossing. However, I do not believe it will be built by December 2022, as alleged by Suffolk County Council. I believe that the marina side of the project, is under dispute between ABP and Suffolk County Council, which could see the project delayed by a year. This seriously needs looking at, as we know that ABP have form in causing projects to be delayed or scrapped in Lowestoft.

2) Pedestrian/Cycle Bridge: We were meant to have a Pedestrian/Cycle Bridge next to the Bascule Bridge, under the Local Sustainable Transport Fund. Lots of meetings about it between Suffolk County Council and ABP, which saw £3 million get wasted. What a waste of money. As a pedestrian, I welcome that this is still on the agenda, but very sceptical whether this will happen.

3) Bloodmoor Roundabout: I believe the changes made have been better for pedestrians, so this needs to be taken into account before any changes are made. However, I do accept that there have been concerns raised about the Ribblesdale entrance and this needs to be looked at.

4) Lowestoft Station: Needs a revamp.

Attached documents
Amanda Frost

Section: Lowestoft Infrastructure

Comment ID: 403

Comment: Lowestoft Town Council should be involved in the process for improvements at Lowestoft Station, which currently is not the case.

Attached documents
Andrew Stewart

Section: Lowestoft Infrastructure

Comment ID: 838

Comment: These improvements should help, but without better national transport links Lowestoft is going to be disadvantaged and will fall behind competitors for inward investment. While not within the Council's direct gift, the railway link from Ipswich/London and the A12 are both inadequate to support the town. Bypasses around the villages on the A12 will assist access and reduce the time to arrive from the south and upgrades to the west are vital for reducing travel times. Lowestoft is difficult to get to and frequently congested upon arrival reducing its appeal as an employment base and a tourist destination.
Anglian Water Services Limited Stewart Patience

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<td>Comment</td>
<td>Para 2.7, 3.6, 4.6, 5.3 and 6.3 – Infrastructure needs</td>
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Reference is made to localised improvements to the sewerage network being required to accommodate development in Lowestoft, Beccles and Worlingham, Halesworth and Holton, Bungay, Southwold and Reydon. There is also reference made to an upgrade of Beccles water recycling centre being required by 2030.

We are currently in the early stages of developing a 25 year growth forecast for our area of responsibility and are developing long term integrated strategies to manage growth, for catchments in our area. This will be published and consulted on in our new Water Recycling Long Term Plan and as part of the PR19 business planning process (next business plan period). It will be used to inform future investment by Anglian Water at existing water recycling centres and within foul sewerage network as part our business planning process.

Anglian Water would welcome the opportunity to have further discussions with the Council as the Long Term Plan is developed. It would also be helpful to receive regular updates from the Council relating to the delivery of development sites within the district including allocation and windfall sites.

In relation to sewerage network improvements are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvements are investigated and determined when we are approached by a developer and an appraisal is carried out.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section  Lowestoft Infrastructure

Comment ID  1015

Comment  Welcome inclusion of:

* Pedestrian and Cycle Bridge over Lake Lothing at Brooke Peninsula (including new bridge over railway line to Normanston Park)

* Improvements to the cycle network as identified in the Waveney Cycle Strategy

Policy WLP2.12 involves a significant new neighbourhood either side of the A47. BBCS consider that an essential part of this development would be a grade-separated pedestrian and cycle crossing over (or under) the A47. The proposed new primary school should be located close to this crossing to help achieve very high levels of walking and cycling to the school. BBCS suggest a well designed subway with good visibility would be the best option.

Attached documents
Ben Falat

Section
Lowestoft Infrastructure

Comment ID
18

Comment
"Green Infrastructure":- the land behind Monkton Avenue has been earmarked for development as New Allotments (this is an Asset-Transfer from WDC to OBPC on formation of the new council on 1-Apr-2017: identified as part of SK261497, SK261223 & SK263105 in the The Waveney District Council (Reorganisation of Community Governance) Order 2017). While Policy WLP2.15 identifies new allotments in South Lowestoft, these new Allotments off Monkton Avenue, North Lowestoft should also be considered.

Attached documents
Ben Falat

Section Lowestoft Infrastructure

Comment ID 17

Comment Interesting that the maps and plans appear to make nil mention of 'The Third Crossing'; This is probably crucial to much planning of infrastructure and road-use throughout the area. There is top-line mention within the narrative at "Infrastructure Needs" (paragraph 2.7), but this is not reflected within any diagrams; it ought to be shown. The fact that there are no diagrams showing it gives very little confidence in Central Government pledges and perhaps there exists some local insider knowledge that it once again holds very little chance of being built.

Attached documents
Broads Authority Natalie Beal

Section
Lowestoft Infrastructure

Comment ID
468

Comment
Page 42, Green Infrastructure (and some other equivalent sections). The projects listed in this are more open space and recreation than what is implied using the title as Green Infrastructure. They might even be better described as community facilities.
Dick Houghton

Section
Lowestoft Infrastructure

Comment ID
1095

Comment
Cycling in Lowestoft is dangerous. Much more could be done to provide well marked cycle routes. Have the Councils considered following the example of London with blue tarmac tracks and traffic lights designed with cyclists in mind? There needs to be a proper separation of bikes, cars and pedestrians. I cycle across town in all directions regularly and am strongly aware how dangerous and poorly organised the cycle ways are. If you are serious about encouraging cycling then much, much more needs to be done. I am happy to go over the routes with someone and explain the problems I have everyday. I might add that I am a robust cyclist and am not easily put off.

Attached documents
John Clark

Section
Lowestoft Infrastructure

Comment ID
122

Comment
There was a survey done by the Labour Party earlier this year, regarding the congestion of traffic around Lowestoft, why can’t the Council reinstate the one way system again around Lowestoft like there used to be going back to 1949/1950’s of which was very good and eased traffic.

I have written to Waveney Council, Suffolk County Council and our very good MP Peter Aldous regarding all the above going back to 4/11/2015 of which is obvious this has fallen on deaf ears, of which (I enclose another copy for your good self to read and see the suggestions I made to you then.

I have only lived in Lowestoft for the past 4 years, and realise that the Lowestoft area and surround could be really great again, if every goes to your future plans.

But I know the area very well over the years, hoping my letters to you and the copy of the letter from 4/11/2015 can be of help and suggestions to you.

Attached documents
**Norman Castleton**

**Section**  
Lowestoft Infrastructure

**Comment ID**  
380

**Comment**  
Infrastructure Needs

Improved pedestrian access to all areas free of traffic and cyclists, skateboarders and Motability scooters?

**Attached documents**
Oulton Parish Council Lynne Ward

Section  Lowestoft Infrastructure

Comment ID  1071

Comment  Infrastructure

With the coming online from Woods Meadow of 800 to 900 houses our infrastructure is to become overloaded, a school, community centre and doctor’s surgery has to be built to accommodate the influx of people into the area, and these are already painfully slow in materialising with deadlines not adhered to or missed continuously. We have little faith in the development of another influx of housing causing misery to one and all, the roads are not of a standard to accommodate the extra traffic. Hall lane from the bend at the west end is rural leading to a fast and twisting wider part heading east to a roundabout with Somerleyton Road and Gorleston Road. Both are extremely busy and extreme pinch points, we believe restrictions for HGVs on Somerleyton Road East, West and Gorleston Road turning left south to Mobbs Way industrial estate should be in place, monies will be available for road improvements when the 350th house at Woods Meadow is built to see if the road is capable of carrying the extra traffic. Waveney District council will have control of this money which may not end up being spent on the immediate road system so will other developers wish to pick up the tab.

Attached documents
Peter Eyres

Section
Lowestoft Infrastructure

Comment ID
820

Comment
Transport: With the completion of the third crossing, measures must be put in place to reduce car traffic on the existing road network and to direct it to the new bridge; otherwise, we know traffic volumes will steadily increase until they are at the same levels as to-day. I support the proposed cycle bridge from Brooke Peninsula to Normanston Park. I support implementation of the Waveney Cycle Strategy. I support improvements to Lowestoft railway station.

Flood risk: I support the flood risk project around the harbour.

Attached documents
S R Jones

Section
Lowestoft Infrastructure

Comment ID
325

Comment
[Carlton Colville WLP2.15] The Street from The Gardens eastwards to beyond Famona Road is a notorious flood area – sometimes being impassable. It is to be hoped that dramatic improvements to the surface water drainage are proposed. If not it is most likely that the flooding will become more frequent and deeper.

Similarly the foul sewers of Anglian Water are often blocked and pumped out by them. I understand that the sewage system in The Street has not been significantly improved since it was laid in during the late 1930's. We must have extensive improvements to the system before allowing 800 homes to be connected to it.

Attached documents
Stacy Goddard

Section Lowestoft Infrastructure

Comment ID 554

Comment Also, schools, I have to take my 2 kids to Blundeston as Woods Loke was supposed to be a school built on Fallowfields area but did not happen. Why?

How can we believe a new school will be built at Sands Lane / Meadow development.

Doctors – Oulton closed no one took this over I have to now go to the High Street Surgery, quite a distance but Bridge Rd you need to wait a month for appointments. Who is going to set up the Doctors at the new site? Again I do not believe this will happen – leaving a shortfall.

Attached documents
Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Andy Warnes

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 851

Comment The current undelivered promises and proposals of the existing plans, particularly for those promising redevelopment of the land along Lake Lothing, will NEVER be delivered while WDC keeps adding greenfield sites elsewhere in Waveney for local developers to easily opt out for. NO further greenfield sites should be allowed to be developed ANYWHERE within Waveney or Suffolk Coastal, until these brownfield sites so crucial to Lowestoft's regeneration are fully developed.

Where are the 1600 houses promised in the current plan ??? NO sign of any being delivered.

Look at what has happened to Ipswich and Norwich with the regeneration of their River and inner port areas, Lowestoft MUST benefit from the same sort of vision and developers must be forced to contribute if necessary. A scheme must be set-up that forces them to work in the tougher to develop areas first, not keep putting this off forever.

Attached documents
Bob Bracey

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 1065

Comment North Denes Tourism and Ecological Area

My first comment would be to express disappointment at the Council’s apparent inertia in its recent dealings with this important area of the town. If I have understood the situation correctly I would certainly wish to know why a private developer has been allowed to ‘fence off’ an area of the Denes and what the Council have subsequently done to protect the rights of local citizens in this matter?

My contribution to the consultation process associated with the draft Local Plan as it relates to the above Area is as follows:

* I have lived in Lowestoft for over 40 years and the Area in question has always been available for recreational use by local people. Crucially, it is my understanding that this has always been the case! To my certain knowledge for many years it was also utilised as a temporary camping site and duly licensed by the Local Authority for this purpose.

* I have been advised that the Note of Implementation associated with the North Denes Cravan Site guarantees that this area of land 'will be used exclusively as public open space'. It must follow that this provision is re-incorporated as planning guidance into the new Local Plan.

* I also understand the area is protected by enforceable covenants which guarantee that it 'shall be forever kept and used as a public recreation or pleasure ground' for the benefit of all the people of Lowestoft. Any future Local Plan must reinforce this position.

* It is known as a well established area for local wild life, including migratory birds, and there is a responsibility to ensure it is retained as such. It also fulfils an essential function in that it is the first open 'green space' north of Lowestoft.

* Whilst I understand that the newly formed Lowestoft Town Council is
ultimately expected to draw up an appropriate Neighbourhood Plan it may be unreasonably optimistic to expect this to be created in the foreseeable future. It is therefore of paramount importance that, in the meantime, the future of the North Denes is protected in the Local Plan for the people of Lowestoft and the public in general.

Attached documents
Broads Authority Natalie Beal

Section: Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID: 469

Comment: 2.8 Lowestoft has long been identified as a priority area for regeneration. Is this a formal status? Is it local or national? What does it mean?

Attached documents
### Environment Agency

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**Comment**  
The location and type of development detailed in the policies in this section is dependent upon the new SFRA data. As you are aware the local plan must be based on the most up to date evidence. We understand that it is the council's intention to incorporate the updated SFRA to inform the site allocations and policies. We will be willing to review this document once it is finalised.

We feel the green infrastructure section of this policy concentrates on sports facilities and should acknowledge the need to provide green infrastructure such as green corridors in developments. Whilst we acknowledge green infrastructure is included in later policies, we feel this would be an appropriate opportunity to highlight the issue.

**Attached documents**
**Historic England**

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**Comment**  
We broadly welcome the objectives for central and coastal Lowestoft. In particular, we are pleased to see reference in objective 1 to improving connections and permeability, in objective 5 to bringing back derelict land into a positive use, in objective 7 to enhancing the quality of design and the public realm, and in objective 10 to improve the natural, built and historic environment of the area. However, the objectives and supporting text could be more specific about the historic environment of the area, its current state, and the opportunities there are for heritage-led regeneration of some areas.

**Attached documents**
J Clutten

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 920

Comment Central Lowestoft

"The key focus of the Local Plan is to continue the promotion of regeneration in Central Lowestoft"


Ensuring the vitality of town centres

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;

recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites


It only takes a walk to see how low the central shopping areas of Lowestoft have sunk.

I feel the town centre would benefit from a more innovative approach, the trend towards shopping on line means that there is a requirement for fewer shops in the town centre, London Road North is already pedestrianised, with some ingenuity this area could be given a community feel and buildings could be renovated to provide quality small housing units, Perhaps even building across the pedestrian areas in some places to provide a wind break, In the winter the town is more inhospitable than it needs to be. A number of sites near the town centre have been used for new housing, this should be continued. These housing units should
encourage small coffee shops, restaurants and shops, there should be a more sensible approach to parking charges, most of the year car parks are empty and likewise the town. The shopping survey did not really ask the right questions.

4.40. Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate. National Planning Policy Framework 2012


There is also a suggestion that there would be a retirement community as part of the 'Lowestoft Garden Village, this might be better sited in the town, nearer more local facilities, the railway and bus stations, Lowestoft 60+ club, banks, Post Office etc.

One report points out the need for an 'in town hotel' which is a proposal for Battery Green, Lowestoft is a seaside town and the sea front is the place for hotels plus there are currently two in the north of the town, while a new cinema might be of benefit, replacing the car park with small affordable apartments would, I suggest be a better option.

Attached documents
**Jim Gwyther**

**Section**  
Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

**Comment ID**  
249

**Comment**  
There are discrepancies between the map on page 45 and the map on page 47 (and also page 82 of the map book)

The map on page 45 shows the East of England Park coloured mauve and numbered 2 to be much larger than on the other maps, running as far as Links Road in the north to and to Yarmouth Road in the west. I believe it is the intention for the East of England Park to be limited to the area in the map on page 47. If you agree please change the information on page 45 to shrink the East of England Park to the limits on page 47 showing WLP2.5 coloured dark green

**Attached documents**
Lowestoft Town Council Shona Bendix

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 1293

Comment Objectives for Central and Coastal Lowestoft Point 6.

We have lost the Tourist Office which is often the first port of call for visitors. The LTC urges that a central tourism VIP be re-established.
Marine Management Organisation Stacey Clarke

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 57

Comment I would like to suggest areas where further in-depth references in a similar style could be made to the marine plans to more holistically consider them in this local plan:

• When the Outer Harbour is referred to there could be reference made to East Marine Plan policies around Ports and Shipping and/or Dredging and disposal as these policies are designed to enable continued use of ports and safe navigation routes

Attached documents
Norman Castleton

Section  Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID  182

Comment  Central & Coastal Lowestoft Area

1. North Denes: How can this possibly be a Ecological Enhancement area with a static caravan site stuck right in the middle. Cheap housing with reduced council rates. The North Denes was given to the Town via covenants over 100 years ago for the leisure enjoyment of the towns folk, The councillors who presented Tingdene with this large area of open public common land should be ashamed of themselves. The caravan park should be removed to produce a long open coastal strip for the benefit of wildlife particularly migrating birds and the citizens of Lowestoft.

2. East of England Park

The problem with this plan is the Birds Eye factory sited right in the middle. However, if restoration is the intention to a natural state with the net drying racks restored designed to be vandal proof then I am supportive. If the intention is to introduce a lot of artificial foreign structures then no thank you. It should also be noted that this is a bird migration stop over point the same as the denes north of the oval.

3. The denes north of the oval just needs some tidying up work and some sympathetic ecologically suitable shoreline planting including trees.

Attached documents
Peter Eyres

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 825

Comment With reference to Fig. 7 and the table, it is extremely confusing to call Area 1 "North Denes Tourism and Ecological Enhancement Area" because everyone knows the North Denes is the area between Links Road and Bird’s Eye. As far as can be ascertained from the vague nature of the map, Area 1 seems to cover Pleasurewood Hills, Gunton Hall, Dip Farm east of the old railway line, Corton Woods and Gunton Warren. What is the significance of no longer designating the pitch-&-putt course and the field west of the railway as open space, as they are in the current plan? It is to be hoped there is not an intention to put caravans on Dip Farm, as has been mooted; indeed, to do so would contravene policy WLP8.34, to protect the sense of leaving Lowestoft before arriving in Corton by not adding buildings, signs, lights and other development along the road. There is no policy attached to this area and it is difficult to envisage what might be intended for it. Please clarify.

The actual North Denes occupies the greater part of Area 2. The area between Links Road and the caravan site is designated as open space on the policies map and it is important that it is protected as such, but the council has intimated its intention to put static caravans on this area, and has started by leasing a small part to Tingdene for that very purpose. This is not acceptable because:

* The area is covered by North Denes Caravan Site, Lowestoft: Note on Implementation, a council policy thrashed out with much sweat and tears and dozens of meetings within and between the council and local residents: this guarantees that this area (Area A of the NOI) "will be used exclusively as public open space." The NOI has been incorporated as planning guidance and this needs to be reaffirmed in the new plan;

* The area is the first substantial open lung of green space next to the densely populated centre of Lowestoft;

* The North Denes have for long ages been freely available for the
recreation of the local people;

* The area is protected by enforceable covenants which guarantee it "shall be forever kept and used as a public recreation or pleasure ground" for the benefit of all the people of Lowestoft;

* It is a wild area used by migrating birds etc.; and

* The existing caravan site already forms a poor setting for the conservation area as stated in the North Lowestoft Conservation Area Appraisal (2007), especially now that the site has been surrounded by industrial-style fencing entirely out of keeping with both its residential use and its setting in a green lung; extension of the caravan site would only make things worse.

Grammar niggle: 2.12 "in order TO ensure"
Protect our North Denes Association Dorothy Smith

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 975

Comment POND A is concerned with the North Denes from Links Road south and including the caravan site; this area is covered by the North Denes Caravan Site: Note on Implementation. Areas A and D of the NOI are within the area shown in your policies map as open space, it has been widely acknowledged that this area is open space protected by enforceable covenants in perpetuity for the people of Lowestoft guaranteeing it will remain as open space.

Gunton Cliff is in the North Lowestoft Conservation area; some of the properties which overlook the Denes are listed. The protection and enhancement of the existing open space is very important, together with biodiversity habitats around Gunton Warren with the migrating birds making use of the Denes open space as a stop over place on their journey to warmer climates. This is only a part of a bigger picture: the East of England Park qualifies for ramp repair, and renewed access to the sea wall. All 3 access paths along Gunton Cliff were promised to be restored to their former glory to access the Denes, (2 of which are now impassable with overgrown vegetation) and the steps leading to the sea wall refurbished. The temporary wire fence stopping access at the South eastern corner mentioned in the next sentence of area A to steps accessing the sea wall from the open space should be removed. Urban paths can reap economic benefit, improved public access linking public rights of way and the freedom to roam which will support the local economy and peoples health and well-being. Also there is a huge mound of spoil dumped on a flood plain without permission on the fenced off open space this is in breach of planning control and the requirements of open space in accordance with the policy document. This is not helping to improve accessibility to open space it is creating more problems for the future.

Over many years, landowners have abused the law on paths, grants have been available and either never applied for or been used for other purposes.
It is a long time since we had pride in our town, by improving poorly maintained areas, buildings, conservation areas, walkways or open space: this investment is well overdue to protect our heritage for future generations to enjoy.

Local Green space is of particular importance to local communities, the fauna and flora have educational qualities as well as offering benefits of fresh air exercise and a wealth of benefits for relaxation in these stressful times we live in. Open space on the Denes is even more valuable for those who live in North and Central Lowestoft and beyond whose quality of life is restricted due to the shortage of open space per head of population, this situation will probably worsen as new housing in North Lowestoft is developed; residents should be encouraged to take the fresh air and on the Denes it could not be fresher, walking, enjoying the peace and quiet, meeting friends, jogging, walking the dog as many do.

As a community group it is encouraging to see the fruits of our efforts start to come to reality and that the Waveney Local Plan means just that, putting right what has been for a long time wrong in the local area.

We welcome the opportunity to comment and look forward to the open space which no one can use being brought back so people can walk this area as they have done in the past.

Attached documents
Statuslist Limited (GVA Grimley Limited) -
Alison Wright

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 1500

Comment Paragraph's 2.8 and 2.9 of the Plan confirm that Lowestoft has long been identified as a priority area for regeneration and benefits from substantial redevelopment opportunities on former industrial sites which are currently underutilised or derelict.

Paragraph 2.12 of the Plan confirms that the emerging Local Plan will replace the current AAP for the Lake Lothing and Outer Harbour area. As such, the Kirkley Waterfront and Sustainable Urban Neighbourhood remains a site proposed for allocation in Central Lowestoft, under Policy WLP2.4.

Policy WLP2.1 advises that the Council will work with partners including Suffolk County Council, Lowestoft Town Council, Oulton Broad Parish Council, Associated British Ports, the Environment Agency, Network Rail, landowners and local businesses to deliver the objectives for Central and Coastal Lowestoft and the specific objectives identified for the main themed opportunity areas, including the Kirkley Waterfront and Sustainable Urban Neighbourhood.

Our client broadly supports Policy WLP2.1 but wishes to make the following observations.

In terms of the objectives for Central and Coastal Lowestoft, greater flexibility is required in recognition of fluctuating national and local economic conditions and public sector funding. As such, a further objective should be included to 'Ensure proposals are flexible and deliverable'. This would be in line with Objective 13 of the current adopted AAP for Lake Lothing and Outer Harbour. The Inspector's Report for the Lake Lothing and Outer Harbour AAP specifically referred, at Paragraph 120, that it was important for the AAP to provide sufficient flexibility to enable the circumstances of each site that bear upon viability and deliverability to be
taken into account. The emerging Local Plan proposes to replace the AAP and therefore this flexibility needs to continue to be in place to acknowledge development viability in any new proposal within the Kirkley Waterfront and Sustainable Urban Neighbourhood site. Further commentary in respect of viability and deliverability is provided in the following sections of these representations, in respect of the site specific allocation under Policy WLP2.4.

Attached documents
Sue Barnard

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 710

Comment With regard to the North Denes Tourism and Ecological Enhancement Area, no details are given other than the area is highlighted on the map on page 45 of the Waveney Local Plan and a box on the page 46 that states the aims for this area are to, "Enhance the tourism offer, protect and enhance the existing open space and protect and enhance the sensitive biodiversity habitats around Gunton Warren." Unlike the other areas given boxes on page 46 there are no further details about how this is proposed to happen, which makes it very difficult to comment on in the consultation period. This is not what is expected in a local plan.

Yes, the local plan is a document under constant development and construction, so why the lack of information?

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP2.1 - Central and Coastal Lowestoft Regeneration

Comment ID 1248

Comment We support Objective 10, to improve the natural environmental quality of the area.

Attached documents
Policy WLP2.2 - PowerPark

Amanda Frost

Section Policy WLP2.2 - PowerPark

Comment ID 405

Comment It's great that there are so many offshore opportunities but I would like to think that after Brexit and the return of the UK's fishing rights, that the fishing industry, which was once such a large part of Lowestoft's economy, would also be given support and opportunities to come back here and thrive.

Attached documents
Highways England  David Abbott

Section  Policy WLP2.2 - PowerPark

Comment ID  1528

Comment  This employment site is directly associated with offshore operations. This brings with it a set of peculiar challenges and opportunities. We would like to see the Plan maximise its emphasis wherever possible on sustainable transport initiatives that will be considered exemplary in this employment sector.

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<td>No reference is made in either the supporting text or policy WLP2.2 that Power Park includes parts of two different conservation areas through the inclusion of Whapload Road and the Dock in the proposed allocation. We recommend that they are included. We welcome the references in the policy to the Scores and the Historic High Street. We also welcome identification in the policy of the heritage of the area and the aspiration to retain non-designated heritage assets within any redevelopment of the area. We recommend further consideration of the wording of this part of the policy to ensure it is National Planning Policy Framework (NPPF) compliant.</td>
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| Comment | I would like to suggest areas where further in-depth references in a similar style could be made to the marine plans to more holistically consider them in this local plan:
  
  - Where Power Parks and Offshore Energy is referred to reference could be made to East Marine Plan policies around employment (Policy EC3 is supporting offshore wind as seen as a transformational economic activity) and renewable energy (Policy WIND1 and 2 enabling offshore wind) |
| Attached documents |  |
Norman Castleton

Section Policy WLP2.2 - PowerPark

Comment ID 188

Comment I am a great believer in this concept. I like the fact all new development will be devoted to the creation of new businesses concentrating on the offshore and sustainable power sector. The area does need cleaning and presumably some buildings demolished to make way for the new. The electrical recharging points outside the OrbisEnergy centre should be extended throughout the site and eventually the town. Perhaps another turbine could be included. The current use of the immediate area of the turbine as what appears to be a scrapyard should be cleared to make the site more attractive to businesses.

Attached documents
Peter Eyres

Section Policy WLP2.2 - PowerPark

Comment ID 826

Comment It would be wonderful if the means for cyclists to gain access to the seawall from the end of Hamilton Road could be improved – now cyclists have to carry their machines down steep wooden steps. Direct access, without having to dismount, would be ideal.

I support the other cycling proposals.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.2 - PowerPark

Comment ID 1696

Comment Accessed from A47 (trunk)/ Sustainable links to town centre required
Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.2 - PowerPark

Comment ID 1668

Comment Development could discharge into sea unrestricted, would have to size attenuation for tide lock scenario. Tidal flood zone 2 and 3.

Attached documents
**Suffolk Wildlife Trust James Meyer**

Section | Policy WLP2.2 - PowerPark
--- | ---
Comment ID | 1249

**Comment**
We note that the policy recognises the presence of the Lowestoft Harbour Kittiwake Colony County Wildlife Site (CWS) within the policy area and that it requires mitigation for any impacts arising from the proposed development. However, we consider that the mitigation hierarchy should be applied and therefore that any development should first seek to avoid any impacts on the CWS. If this is not possible mitigation must be the next step applied.

**Attached documents**
Policy WLP2.3 - Peto Square

Amanda Frost

Section  Policy WLP2.3 - Peto Square

Comment ID  406

Comment  Conservation areas should be extended to include areas with large amounts of Victorian architecture within Lowestoft. So much has already been ruined with ghastly alterations, plastic windows and doors and conversion into houses of multiple occupation.

Attached documents
Amanda Frost

Section  Policy WLP2.3 - Peto Square

Comment ID  404

Comment  The proposed allocation of mixed use development at WLP2.3 is essential because this is currently very unsightly and an awful approach into the Lowestoft central area. I think this should be an immediate priority.

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<th><strong>Amanda Frost</strong></th>
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Environment Agency

Section Policy WLP2.3 - Peto Square

Comment ID 860

Comment Paragraph 2.23 states "The planned strategic flood defence measures which form part of the Lowestoft Flood Risk Management Project will have the effect of protecting this site from flooding in the 1 in 1,000 year event. As such there may be scope over the plan period for development defined by national planning policy as 'more vulnerable' such as hotels, drinking establishments and houses to take place in this area." Such development would still be subject to the Exception Test being passed and showing the development is safe. This is an issue that will be addressed in the level 2 SFRA through understanding the flood risk in greater detail. The Level 2 SFRA should consider the detailed nature of flood characteristics within the flood zone for the allocated sites to ensure the exception test can be passed.

The policy implies that because a flood risk management scheme will be in place more vulnerable development will be supported. As stated above the Exception Test is still required to be passed. This does also not remove the flood risk completely and there is still a residual risk of a failure of the protection measures which must be considered.

Attached documents
Heather Leybourn

Section Policy WLP2.3 - Peto Square

Comment ID 1

Comment I particularly welcome the proposal to bring the Customs House back into public use, and to enhance the space between the Customs House and the waterfront. This is one of the few architectural gems in Lowestoft and it is heartbreaking to see it standing doing nothing.

Attached documents
Historic England

Section Policy WLP2.3 - Peto Square

Comment ID 1376

Comment We welcome paragraph 2.20 which clearly sets out the importance of the square as a point of arrival, defined by a number of historic buildings. We welcome identification in the policy of high quality public space, bringing the Customs House back into use, and preserving and enhancing the conservation area through the regeneration. We would welcome reference to the grade II status of the building known on the National Heritage List for England as 'Port House' but not known locally under that name to avoid confusion.

Attached documents
Norman Castleton

Section  
Policy WLP2.3 - Peto Square

Comment ID  
375

Comment  
Peto Square

Like most people I have spoken to about Peto Square I dread passing through this area. In this country we seem unable to manage open squares very well. They either become areas for questionable and squalid human behaviour and/or descend into scruffy decrepitude. This unlike many continental town and city squares where table outside bars and restaurants are used in a civilised and life enhancing manner. The areas outside McDonalds & the Sir Joseph Conrad are poorly managed and generally scruffy with noisy loud mouthed clients. I agree with the measures in policy WLP2.3 but would add the that area needs a thorough good clean up and the removal of skateboarder, cyclists, motor cyclists and like London Road North the removal of unauthorised car parking. More greenery would help and the sea-gull problem as in the rest of the town must be addressed in a humane manner.
Richard Morling

Section Policy WLP2.3 - Peto Square

Comment ID 817

Comment I agree with most of the above, but most redevelopment and planning should not really be considered until after the new 3rd crossing has been built to ascertain the traffic in this area, and how best it can be controlled. Access for public transport over the bascule bridge, should be maintained or increased.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.3 - Peto Square

Comment ID 1669

Comment Development could discharge into Lake Lothing unrestricted, would have to size attenuation for tide lock scenario. Tidal flood zone 2 and 3.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.3 - Peto Square

Comment ID 1697

Comment Improve sustainable links (walking/cycling along North side of Lake Lothing) and provide cycle parking

Transport Assessment required

Attached documents
Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Badger Building (E.Anglia)Ltd Edward Gilder

Section

Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID

1451

Comment

Currently the development of this site in accordance with the planning permission is ransomed by the need to relocate the Jeldwen playing field on to land in third party ownership.

The planning permission is now 2 years old, and no reserved matters application has been made.

Given the time scales for completion of the necessary technical work to allow development to commence on roads and sewers and the lack of detailed information on how these issues would be addressed at the outline stage, we conclude that delivery on this site is, as a minimum, some way off.

We remain of the view that the scheme as proposed at the outline stage is not deliverable due to the nature of the design – with a very high reliance on flats – and even in the present more buoyant market we believe demand in this area to be very limited.

The site remains in commercial use and development in part whilst the commercial activities continue on the site is unlikely to be an attractive proposition.

Attached documents
Beccy Francis

Section  
Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID  561

Comment  
We note that there is a similar size proposal for Kirkley Waterfront in the centre of Lowestoft and agree that this is an ideal location – somewhere that is urban and in dire need of development. There will be no detriment to history, wildlife or inhabitants in areas like this and the proposed development there would unarguably be an improvement. We most definitely cannot say this about the development of the Garden Village at Corton.

Attached documents
Colin Butler

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1101

Comment Lowestoft badly needs a rejuvenation of industry, and Lake Lothing is surrounded by several derelict or underused, yet still valuable, industrial sites. In particular, it makes no sense to spend public money to plan to build twee apartments and marinas on the Brooke Marine shipyard, when Serco ordered a fleet of tugs and service vessels for the Royal Dockyards at taxpayers' expense from Damen in Holland. All of those 30-odd vessels could have been built in Lowestoft. Precious waterfront industrial sites should be retained, and shipbuilding re-development encouraged.

Attached documents
Darren Clement

Section  Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID  737

Comment  I am looking to open a hotel on the south side of town and I raise concerns about the housing being proposed on the waterfront area. As a person who has lived/experienced different parts of our country I am surprised that the council does not realise its biggest potential of tourism for generated cash and business. I want tourists to come here - but they must have something to come for. Development along that stretch of water front with so much housing and a limited bit of "a" shop and restaurant as suggested seems silly. I know its mentioned about some facilities but I cannot see any type of nice apartment development with good, reasonable marina facilities. I can see some houses that are then spoilt with the "affordable" rented properties and clients who misuse them. (I am a landlord).

Don't miss the opportunity to really exploit the frontage. We (the council represent the people) must also increase the access to the water for the general public as much as possible also. I want a cable ski park there, SUP schools etc. I'll run them for us!

IMO I only see the town has tourism to offer as it's main industry. (forget the wind farm c**p - how many locals are actually involved - most are out of town contractors).

Attached documents
Darren McIntyre

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 5

Comment Hi this development sounds good and I hope there is a large % of affordable homes included that the younger generation can buy but living in our town for same 45 years I have seen that the towns road network is not being improved in anyway but in fact it's worse today than many years ago when it takes over an hour to travel from one side of town to the other you now we are being let down by the council and the area of Victoria road is a black spot for traffic and building 1380 homes here plus businesses with workforces and a school with the 'school run twice a day ' I know what that's like living next to a school no amount of encouragement is going to make people get on a bike or walk this area is going to be overwhelm with traffic So you must have a rethink on how the extra traffic is going to go because the existing road network in that area just not up to the job. I hope the people doing all this planning actually live in our town or we end up with another lowestoft bridge disaster think bold and do right by the town

thank you

Attached documents
Dick Houghton

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1094

Comment If the Brooke site and Jeld Wen are used to build homes then any resurgence of maritime trade and construction will be limited. The Brooke site in particular is uniquely suitable for ship building and offshore energy construction (tidal powere is emerging and the Norfolk coast is one of the most energy rich coastal environments around Britain). It would be very short-sighted to use it for housing. People do not need to live by the water. Lake Lothing has been the source of most of the areas earlier prosperity and could be again. Wages in the far east will rise as ours stagnate leading to shipbuilding becoming more viable in the UK. See Maritime UK.

Attached documents
Dick Houghton

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 694

Comment This plan is comprehensive and worthwhile reading. However...!

Having read it I my main problem is to do with the eventual change of use of parts of the Brooke Peninsular and the entire Jeld Wen site to housing.

Lake Lothing or the Inner Harbour is the reason that Lowestoft exists and was responsible for the town’s prosperity in the past, sadly now much diminished. If we are to have a prosperous future in manufacturing again it is extremely short-sighted to give over valuable quayside plots to housing. There will come a time when they could be used for construction of marine renewable energy facilities and ship-building.

Not just wind power (over which we seem to be currently largely bypassed by Hull and Harwich) but offshore tidal power generators which are getting to the stage (see Orkney http://www.scotrenewables.com) where they are becoming commercially viable. The north Norfolk coast is amongst the top five sites around the UK for tidal energy (the others include Orkney, Outer Hebrides and the Bristol Channel). Our southern quaysides and Brooke peninsular are irreplaceable sites for the assembly and launching of these devices. The council(s) need to be much more active in promoting this than at present.

As wages increase in the far east and our wages remain stagnant we will soon (5 years?) get to a point where ship building is again viable in the UK. Maritime UK (https://www.maritimeuk.org/) is pushing the government to kick start the development of new ship building enterprises in the UK. These are expected to rely on digitally controlled machinery and modular construction methods. These boats will need to be assembled somewhere with large sheds and slipways. The unique Brooke site would be ideal and is irreplaceable.

It is highly unwise to block off this opportunity for a resurgence of marine construction opportunities in the town by building houses on either of
these sites. People do not need to live by the water. We have many acres of farmland around Lowestoft and the other Waveney towns on which to build housing without this wilful and short-sighted blocking of the town’s main asset which is Lake Lothing.

Attached documents
Education and Skills Funding Agency Douglas McNab

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 796

Comment The Draft Infrastructure Study indicates that a s106 contribution towards the 1.5 FE schools identified for Kirkley Waterfront and Sustainable Urban Neighbourhood Site (Policy WLP2.4) was secured from the Brooke Peninsula development (DC/13/3482/OUT, granted August 2015). However the ESFA notes that this contribution of ~£4.7M did not equate to the full cost of the school (£7.6M), according to the Draft Infrastructure Study, perhaps because the need for school places generated by the development was less than the full 1.5FE.

Attached documents
Environment Agency

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 861

Comment We acknowledge and support the policy to locate residential development away from the areas of highest flood risk, as this would follow the sequential approach as required by the NPPF. We feel the policy should still emphasize the need for Flood Risk Assessments for individual applications demonstrate that development will be safe and will not increase flood risk elsewhere.

Whilst the previous uses of the site are identified, it should be detailed that these have the potential to cause land contamination. Developments would therefore need to manage this appropriately, through a preliminary risk assessment, site investigation, remediation and a verification report.

We welcome the desire to increase the biodiversity across the site including increasing the habitat for the common lizards.

Attached documents
Gisleham Parish Council Derek Ward

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1111

Comment Within WLP2.4, a more focal point sports arena could be created. This would be central to the population of Lowestoft and close to the third river crossing, enabling more people to use the facility and allow provision for easier access by public transport, cycling or by foot. With this being close to the river, the effect of potential flood would be minimal.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section  
Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID  
954

Comment  
The Plan includes a number of proposals for large scale strategic allocations that account for much of the Plan’s housing requirements including Policy WLP 2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood; Policy WLP 2.12 – North Lowestoft Garden Village; Policy WLP2.15 – Land South of The Street, Carlton Colville/Gisleham; and, Policy WLP 3.1 – Beccles and Worlingham Garden Neighbourhood. Whilst the identification of strategic allocations is an approach that can be 'made sustainable' through the timely provision of associated infrastructure, it is essential that local plans take into account the risks associated with the delivery of any such schemes and the knock on effect that this can have in terms of housing delivery. It is also noted that the Plan is not currently accompanied by a viability study and it is vital that this evidence is produced alongside robust assumptions regarding infrastructure delivery and its impact on the likely rates of delivery from strategic sites.

As indicated in response to Policy WLP1.1, it is essential that the Council’s suite of housing land allocations can demonstrably deliver the local plan requirement over the plan period whilst maintaining a five year housing land supply.

Attached documents
Graham Hunt

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 535

Comment The river frontage should be retained for commercial use and industry. There is limited river frontage available. And with the increase drive for renewable energy the port of Lowestoft can become a major player in this sector.

Attached documents
Highways England David Abbott

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1527

Comment It seems clear that this site will be closely associated with the new crossing at Lake Lothing and, as such, its impact on the A47 in the centre of Lowestoft are perhaps therefore likely to be tolerable. This assumption will need to be tested though as part of the evidence supporting the Plan. In particular, its impact on the A47/Millennium Way should be assessed in detail.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1461

Comment Our main concern here is regarding the planned Kirkley Waterfront and Sustainable Urban Neighbourhood (Policy WLP2.4). This site is already subject to Site Allocation SSP3 in the 2012 Lowestoft Lake Lothing & Outer Harbour Area Action Plan and the current consultation makes much of the progress so far on the site in terms of securing outline planning permission for 1,180 of the 1,380 new homes planned. On the surface this level of progress would seem to indicate that development is likely to come forward on the site over the next few years. However, this ignore the fact that no reserve matters applications have yet been submitted for the Brook Business Park (850 dwellings granted outline consent in August 2015 by DC/13/3482/OUT) or the Former Sanyo Site (252 dwellings granted outline consent and 48 granted full consent in January 2016 by DC/15/2004/RG3) and there are longstanding viability issues associated with the site. The First Draft Plan also states that the Jeld Wen Factory site remains under a long lease which means that it may not be available for redevelopment until the early 2020s.

Hopkins Homes are the largest independent housing provider in the district and they have an extensive knowledge of the local housing market. Based on this knowledge, it is understood that there is currently little developer interest in the proposed Sustainable Urban Neighbourhood at Kirkley Waterfront as at the present time it is simply not a viable development option. The outline consent at Brook Business Park has less than one year left for the submission of reserved matters, after which the consent will lapse. In the present climate it is considered highly unlikely that this deadline will be met and this will have a severe knock-on effect on predicted delivery rates on the site during the emerging Local Plan period to 2036. We consider that the predicted delivery of new homes on the site during the plan period needs lowering by at least 300 homes to allow for this delay.
Attached documents
Isaac Francis

Section  Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID  521

Comment  For Lowestoft itself, I would again suggest trying to keep everything central- WLP2.4 is a good place to build (near to the lake but I think this is a lot less danger to children than being near to a trunk road) and so are most of the Preferred and Alternative sites in the north.

Attached documents
Eatock

Section
Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1210

Comment
RE: Development of Sanyo Site, School Road, Lowestoft.

I would like to register my objection to the above proposed development, in particular its impact on the properties in Heath Road. The development is currently contained in PLANNING REFERENCE: DC/15/2004/RG3. This is yet to commence but I am assuming that it could or that something similar will replace it.

I am therefore taking the opportunity to voice my concerns and hope that when development does commence, my objections are investigated and understood and actions are taken to reduce the impact on Heath Road as is being proposed for the other less affected roads.

Remember Heath Road is sandwiched between two developments – Sanyo, and Brooke Marine / Jeld Wen – an unenviable position!!

My main concern is that full consideration has not been given as to how the new development fits in with the current properties in Heath Road and that the arguments for building height and design are not applied equitably across the development.

BACKGROUND

In the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief [http://www.waveney.gov.uk/site/scripts/documents_info.php?documentID=137&categoryID=200145&pageNumber=6], sections 4.3 to 4.9 (Appendix 1), it discusses properties on Victoria Road where housing densities are 40 dwellings per hectare and states that "densities on the southern parts of the western section of the SUN should reflect this character". Next it discusses Waveney Drive where the density is 34 dwellings per hectare and recommends that "the SUN should create a high quality, residential frontage along Waveney Drive of a similar density".
No mention is made of Heath Road where the impact on current properties will be at its greatest.

In sections 7.19 to 7.22 (Appendix 2) residential densities are again discussed for Victoria Road, School Road and Stanley Road and recommends that densities of new developments should be similar to those in that area. For Waveney Drive it states that "A high quality residential frontage should be provided along Waveney Drive that reflects the existing residential properties on the south side of Waveney Drive".

Again, no mention is made of Heath Road,

THE PLANNING APPLICATION

In the Planning Statement, there is again allowance made regarding density of dwellings near to Victoria Road. On page 33 (Appendix 3) it states "Furthermore, the scale of development in this location has been kept at 2-storey, to minimise any impacts on the nearby dwellings on Victoria Road and School Road, which reduces the opportunities to create a more dense development. It is considered that the density of development proposed is appropriate, given the site's location adjacent to existing residential development."

Again on page 33 we have separation distances.

For Victoria Road," the separation distance between the existing and proposed dwellings would be over 40m at the closest point, and generally in excess of 55m".

And for Heath Road "There will be a separation distance of over 30m between the new and existing dwellings, which is sufficient to ensure no inter-visibility or overlooking. Whilst the new dwellings will be three-storey in height, their flat-roofed design, coupled with the separation distance, ensures that the new dwellings will not be overbearing.

This makes no sense at all. New properties (50m) to the rear of those in Victoria Road will be kept at two storeys to minimise the impact on current properties whereas it infers that in Heath Road, new three storey properties (30m away) will not impact on the current mix of mostly detached bungalows and two storey houses. Why is it that three storey properties would impact on current ones in Victoria Road but have no impact in Heath Road when they will be 20m closer.

I am surprised that the developer has not used the above distances to justify building three storey blocks to the rear of Victoria Road and two
storey pitch-roofed houses in Heath Road.

In the Conclusion to this Planning Statement we read "Be of a scale and mass which respects the existing and adjoining development, whilst optimising the opportunity for higher buildings towards the northern end of the site where there are no immediate neighbours." This statement is clearly at odds with the development plans for Heath Road.

In the Design and Access Statement the following statements on page 45 continue the theme of inconsistency in how the new development relates to current properties.

It admits there is a mismatch of style and scale and justifies it using meaningless phrases such as "architectural distinction" and "enhanced street setting". Such phrases do not explain why the mismatch is happening. It also states the separation distance as 19m and describes this as good. In the Planning Statement the separation distance was 30m. Why has this changed?

Summing up the above I think it's quite clear that the developer is choosing when and when not to meet the criteria laid down in the SUN document. The proposals show that much has been down to minimise the impact of this development on School Road and Victoria Road, but Heath Road will get three storey blocks along the full length of the development. Eleven properties (of which eight are bungalows) on the east side of Heath Road (dwelling density 28) will face the three storey blocks opposite. I cannot see within any of the documents how the developer can justify it. One of the drivers given in Section 13 states "Respect the sensitivity of existing homes". I do not see that being applied to Heath Road.

The SUN document is not set in stone. It is a guide and aspiration. But it's not until it's applied to actual developments that inconsistencies show up.

The developer justifies why he doesn't meet the 300 property target so he could easily justify a two storey build height for Heath Road.

So please make the development of Heath Road a max of two storeys. Detached and semi-detached, perhaps even a token bungalow. Reducing blocks A and B to two storeys would remove only two one-person flats and two bedrooms from the four bedroom house.

A reduction of just four accommodations would greatly reduce the "mismatch".

Surely these could be relocated elsewhere on the development.
I am sending a copy of this letter to Ingleton Wood in the hope that they can reconsider the application.

With the Jeld Wen development planned to the east of Heath Road we feel under attack from both sides with little or no thought as to the impact this will have on us.

I look forward to your response.

Yours Faithfully

Richard Eatock

APPENDIX 1

Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief

Housing

Density and Quantum 4.3

Figure 4.1 shows the distribution of housing across the site. The majority of this housing is proposed to be located in the western part of the site in close proximity to the key community facilities proposed in the area.

4.4 The waterfront location of the site is close to the geographic centre of Lowestoft. This, in conjunction with the character of the surrounding residential area, means that the site naturally lends itself to higher densities of residential development. Policy SSP3 requires densities of broadly between 50 and 90 dwellings per hectare across the site. The policy provides scope for lower and higher densities where they are appropriate, considering site constraints and surrounding land uses. The land proposed for housing on the site for residential development is approximately 24.5 hectares which indicates an average gross density of 56 dwellings per hectare across the site is to be expected.

4.5 Figure 4.2 shows how density should vary across the site considering the character of surrounding areas and opportunities provided by the waterfront.

4.6 The waterfront areas of the site are more appropriate for multi-storey apartments to provide a landmark focus for the development. Additionally, densities should be higher nearer the local centre, where apartments can
be provided above shops and commercial units.

4.7 Properties along Victoria Road to the immediate south of the SUN have an average density of approximately 40 dwellings per hectare despite having relatively long back gardens. The average densities of the area surrounding the western section vary between 30-60 dwellings per hectare. Densities on the southern parts of the western section of the SUN should reflect this character. There will be scope within these areas for densities as low as 40 dwellings per hectare for some blocks. There may also be potential for a limited number of detached and semi-detached style dwellings in this location.

4.8 The density of properties facing Waveney Drive is approximately 34 dwellings per hectare. The eastern section of the SUN should create a high quality, residential frontage along Waveney Drive of a similar density. As the development moves closer to the waterfront the density should increase to over 50 dwellings per hectare consisting of mostly terrace and townhouse typologies.

4.9 Across the rest of the site, densities should average 50 dwellings per hectare consisting of mostly terraced townhouse style dwellings arranged in blocks

APPENDIX 2

Kirkley Extension Character Area

7.19 This area is a northward extension of the residential area (in the Kirkley and Whitton wards) south of Waveney Drive and Victoria Road. The area should be designed to connect into the built form of the existing community. Development should respect local vernacular but should not be a pastiche of historic architectural styles.

7.20 Development in the vicinity of Victoria Road should reflect the existing fine grain urban form of this area. Residential densities should be similar to those found on School Road, Stanley Road and Victoria Road.

7.21 The main entrance to the development should exhibit two landmark buildings either side of the access road that welcome people into the site. These buildings should be designed to a high architectural quality and could be up 4 storeys in height. As part of the main entrance to the site, landscaping should be used to create an attractive setting that leads the visitor into the SUN

7.22 A high quality residential frontage should be provided along Waveney
Drive that reflects the existing residential properties on the south side of Waveney Drive. Buildings should be set back from the road to provide space for small front gardens. There should be a clear demarcation between public and private space, however, this should not be done in a way that will create significant visual barriers to people using the public realm.

APPENDIX 3

PLANNING STATEMENT - Page 33

The density of parcel 1 equates to 36dph, and parcel 2 has a density of 53dph. Whilst parcel 1 falls below the lower end of the range identified in the AAP, policies HC1 and SSP3 recognise that lower densities may be appropriate, taking account of site characteristics and surrounding land uses. In this instance, the density of parcel 1 is reduced by the fact that a considerable area of the site is required to provide the new access road and turning areas. Furthermore, the scale of development in this location has been kept at 2-storey, to minimise any impacts on the nearby dwellings on Victoria Road and School Road, which reduces the opportunities to create a more dense development. It is considered that the density of development proposed is appropriate, given the site's location adjacent to existing residential development. The SPD acknowledges that densities will be lower in the southern part of the site for this reason.

The density of parcel 2 is within the range specified within the AAP, and within policy DM16 of the Development Management Policies DPD.

The proposed development is therefore considered to achieve a density which is in accordance with policies DM16 of the Development Management Policies DPD, and policies HC1, HC2 and SSP3 of the Area Action Plan, as well as the Development Brief SPD.

Residential Amenity

Careful consideration has been given to the impact of the proposed development on neighbouring residents, to ensure that there is no adverse impact on their amenity. There are residential properties which either border the site, or are in close proximity, on Heath Road, School Road and Victoria Road, and the layout has been designed to ensure adequate separation distances to all of these properties.

A shadow study has been undertaken and is provided on drawings 121 and 126, and detailed commentary on this can be found within the Design &
Access Statement that accompanies this application.

As previously described, the only elements of the layout which are fixed, are parcels 1 and 2 and the open space.

Parcel 1 is positioned along the southern boundary of the western part of the site, and backs onto an access track which provides vehicular and pedestrian access to garages and rear gardens of the existing dwellings on Victoria Road. As described in the 'layout' section above, the separation distance between the existing and proposed dwellings would be over 40m at the closest point, and generally in excess of 55m. This is more than adequate to prevent overlooking and overshadowing. Furthermore, the new dwellings would be two-storey and are located to the north of the existing dwellings, further reducing any impacts on daylight and sunlight. To the east, the new dwellings fronting onto School Road will be situated opposite the playground associated with the former school, now Colville House.

Due to its location at the northern end of the site, Parcel 2 will have minimal impact on neighbouring properties, but the southern dwellings (plots 1-5) which front onto Heath Road will face onto the existing dwellings on the eastern side of Heath Road. The two most northerly existing dwellings on Heath Road are two-storey, and then the scale reduces to single storey, with a continuing mix of single- and two-storey properties along the remainder of Heath Road. There will be a separation distance of over 30m between the new and existing dwellings, which is sufficient to ensure no inter-visibility or overlooking. Whilst the new dwellings will be three-storey in height, their flat-roofed design, coupled with the separation distance, ensures that the new dwellings will not be overbearing and will not overshadow the existing dwellings on Heath Road, even at 3pm at the winter solstice.

Attached documents
New Anglia Local Enterprise Partnership Eunice Edwards

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1540

Comment New Anglia Local Enterprise Partnership is working with Waveney District Council and other partners to regenerate and deliver jobs in the Great Yarmouth and Lowestoft Enterprise Zone. Four sites, identified within the draft Plan, have Enterprise Zone status. These sites have benefitted from local development orders and, until March 2018, also benefit from business rate relief up to a value of £275,000. New Anglia welcomes the identification of these sites in Riverside Road.

Employment land is identified within the allocation made by policy WLP2.4. The draft Plan notes that the layout of uses on the site may change, with the development brief evolving as the site comes forward. This may be necessary in light of the access arrangements for the planned Lake Lothing Third Crossing, which New Anglia strongly supports. Please note that the area identified for business rate relief until March 2018 is set in secondary legislation, which is a relevant consideration in delivering employment land.

Attached documents
Norman Castleton

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 151

Comment I have never agreed with this plan and I particular its use for housing- 1380 extra dwellings is plain ridiculous. The wrong location for housing and the increased demands on already stretched road networks and serves for an increased area population. The Brook site is already in constructive and productive use and this should be retained. This area of the south key given the proposed construction of a third crossing is perfect for an enterprise business park to bring much needed jobs and prosperity to the area. The transport links will be ideal whether by water, road or rail.

Attached documents
Richard Morling

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 816

Comment This is a major site to be considered, for the variety of uses outlined, but the main problem would appear to be the flood risk and access to the narrow Victoria Road and Waveney Drive. The same applies to WLP2.4

Attached documents
Statuslist Limited (GVA Grimley Limited) -
Alison Wright

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1501

Comment Land off Waveney Drive, Lowestoft ('the former Jeld Wen Factory site') extends to circa 14 hectares and accommodation comprises a series of vacant industrial and warehouse buildings (circa 1960's/70's), formerly used for the storage of timber, together with the manufacture and dispatch of joinery items. The site also includes various vacant office buildings and portakabins, along with small workshops. The main factory building comprises circa 148,000 sq ft of accommodation, warehousing extends to circa 74,000 sq ft and storage accommodation extends to circa 289,000 sq ft.

Boulton and Paul were the previous tenants on the site and specialised in the manufacturing of timber doors and windows.

The site is currently accessed via the B1531 (Waveney Drive), to the south. A site location plan is included at Appendix 1.

The site was acquired by Mr Giles Mackay in the mid 1990’s as part of a sale and leaseback transaction with Rentokil. Ownership is through a SPV (special-purpose vehicle) called Statuslist Limited.

Boulton and Paul Ltd was purchased by Jeld Wen Inc in 1999 (an American-owned timber company) and manufacturing activity continued on site until August 2010 when Jeld Wen announced it was closing the factory in order to make savings in its manufacturing processes in order to remain competitive. Jeld Wen subsequently disclaimed the lease and the manufacturing facilities were closed. Rentokil then took control of the lease liabilities and the main lease and the connected sub-leases remain in force but expire in December 2020.

The site has been continually marketed by Arnold Keys, agents on behalf of Statuslist Ltd, for B1, B2 and B8 uses since July 2012 up to the present day.
(see Appendix 2 for marketing brochure).

There has been very little genuine interest over the last five years from potential occupiers as a result of the targeted marketing campaign, with only one two-year lease secured in July 2017 for circa 72,000 sq ft of warehousing from a local haulage firm.

In light of the above, Statuslist Ltd are in the process of reviewing redevelopment options for the site post 2020, when the current lease with Rentokil expires and have commenced discussions with the District and County Council to explore a viable long-term solution.

Land off Waveney Drive ('Former Jeld Wen Factory Site') is identified to continue to fall within the Kirkley Waterfront and Sustainable Urban Neighbourhood site.

Paragraph 2.30 of the Plan states that much of the residential development on the site should be provided in the west of the site including on the former Sanyo site, the Brooke Business Park and Jeld Wen Playing Fields, the former SCA Recycling Site, and the former Witham Paints Factory site as this area generally has less probability of flooding.

The Plan continues at Paragraph 2.32 in proposing that new employment development on the site should be focused along the waterfront of the former Jeld Wen Factory site as this area has a higher risk of flooding and is therefore less suitable for residential development. Reference is also made to the waterfront being valuable for employment development which could support the offshore wind and engineering sectors and supplement proposals at the PowerPark.

Draft Policy 'WLP2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood' of the emerging Local Plan proposes a mixed use development for the Kirkley Waterfront and Sustainable Urban Neighbourhood site, including:

* 1,380 new dwellings;
* Retirement community comprising a care home / nursing home and extra care and/or sheltered dwellings;
* 5 form entry primary school;
* Playing field;
* Local retail centre comprising a convenience store, cafes and other local
services;

* Marina facilities;

* 5 hectares of employment development (falling under use classes B1, B2 and B8) and port related development.

Our client wishes to make the following observations in relation to Policy WLP2.4.

Land comprising the Kirkley Waterfront and Sustainable Urban Neighbourhood was originally allocated in the Lake Lothing and Outer Harbour Area Action Plan (AAP). The AAP process began in 2006, with adoption eventually in January 2012. The AAP provides a spatial policy framework over the period to 2021 (2025 for housing allocations) and included an Illustrative Housing Trajectory at Section 5.5. For the Kirkley Waterfront and Sustainable Urban Neighbourhood strategic site, the trajectory indicates that 260 residential units are likely to be delivered by 2017.

Five years after the adoption of the AAP, there have been no residential units delivered within the Kirkley Waterfront and Sustainable Urban Neighbourhood site. As referred to at paragraph’s 3.9 to 3.11 of these representations, whilst some of the sites benefit from planning permission, our client has significant concerns whether the permissions are ultimately deliverable due to the developer entering administration in respect of the Brooke Peninsula site and contractual requirements not being met in relation to the former Sanyo Factory site.

This is at odds with commentary in the emerging Plan, at paragraph 2.28, stating that ‘much progress’ has already been made towards the regeneration of this area.

In terms of our client’s site (‘Former Jeld Wen Factory site’), the Plan refers to employment uses being suitable on the waterfront area of the site and this is also reflected in the Outline Masterplan within the adopted Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief (May 2013). New housing is indicated on the Outline Masterplan for the southern section of our client’s site.

Our client has concerns that the current proposed mixed-use designations for their site, as referred to within the existing APP and carried through under Draft Policy WLP2.4, render the site undeliverable.

Firstly, there is not a significant or recognised office market in Lowestoft, as
seen in other centres such as Norwich.

There has been very little general activity in the office sector and both the Riverside Business Centre and Orbis have reported a decline in tenants and a good supply of space available.

Furthermore, there is only a limited amount of large employers requiring large space, namely Waveney District Council, Hoseasons and ATP Travel.

There is also a good availability of office space in neighbouring Great Yarmouth, particularly on Beacon Park – a business park located just 5 miles north of Lowestoft where there is 29,760 sq. ft. of Grade A space in 6 units currently available. These were speculatively built as part of a larger industrial and office scheme and these offices have remained vacant since being built 5-6 years ago.

Secondly, the local industrial market has declined since the 2014 oil price crash. This caused a large number of local and national gas and oil offshore businesses to close or relocate. AKD Design and Shell closed down their sites and general supply of available stock has increased. The recovery of the oil price to pre-2014 levels i.e over $100 per barrel of crude oil is the key to the economy in Lowestoft. Currently the price is just below $50 per barrel.

These market conditions are reflected in the level and nature of enquiries for the site received over the last five years of marketing. There have been no strategic or significant inward investment opportunity enquiries that have been received within the B Class sector. This is despite the added incentive of the Enterprise Zone designation on the northern part of the site. On this basis, market conditions and signals provide clear evidence that the site does not serve a strategic function in employment terms.

Thirdly, there have been very few new builds in the area with completions being very low. This is evidenced in the table below which refers to completion rates on 10 residential schemes located within a 10 mile radius of our clients site with the benefit of planning permission and registered with the National House Building Council (NHBC). The 10 schemes contain a total of 401 units but only 40% of the overall units are completed, with 6 of the 10 schemes having no units completed.

<table>
<thead>
<tr>
<th>SCHEME</th>
<th>NO. OF UNITS (%STARTED)</th>
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<table>
<thead>
<tr>
<th>Scheme</th>
<th>Total No. of Units Completed</th>
<th>Percentage Completed</th>
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<td>Woods Meadow, Lowestoft (Phase 1 Persimmon)</td>
<td>241</td>
<td>(95%)</td>
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<tr>
<td></td>
<td>March 2015</td>
<td></td>
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<tr>
<td>Woods Meadow, Lowestoft (Oldman Homes)</td>
<td>25</td>
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<td></td>
<td>August 2016</td>
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<td>Foxborough Road, Lowestoft (Phase 5 – Warnes and Sons Ltd)</td>
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<td></td>
<td>April 2017</td>
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<tr>
<td>Heritage Green, Kessingland</td>
<td>30</td>
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<tr>
<td>Date</td>
<td>Total</td>
<td>Percentage</td>
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<td>------------</td>
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</tr>
<tr>
<td>April 2017</td>
<td>1</td>
<td>(3%)</td>
</tr>
<tr>
<td>October 2016</td>
<td>0</td>
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<td>October 2016</td>
<td>0</td>
<td>(0%)</td>
</tr>
<tr>
<td>April 2016</td>
<td>4</td>
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1. **Land Rear Of The Nordalls, Kessingland**
   - Wellington Construction Ltd
   - 23
   - (100%)
2. **Walker Gardens, Wrentham**
   - Badger Building Ltd
   - 17
   - (100%)
3. **Kings Drive, Bradwell**
   - D M King Ltd
   - 28
   - (68%)
Sales activity for mainstream residential is equally low in the area, as evidence in the Best Price Guide at Appendix3. This confirms there is a considerable amount of second-hand churn in Central Lowestoft. This churn is also not of high quality, mostly with two, three and four bedroom properties, much of which is of an age between the Victorian era and the
1970's.

This lack of construction and sales activity, hence lack of demand, together with the significant abnormal costs associated with remediation works at the site, would make the site unviable for mainstream residential development.

Given that the Kirkley Waterfront and Sustainable Urban Neighbourhood is a key component of Waveney's potential housing land supply, our client supports the commitment within Policy WLP2.4 of allocating Land off Waveney Drive ('Former Jeld Wen Factory Site') within the Kirkley Waterfront and Sustainable Urban Neighbourhood. However, in light of the above, our client has commenced discussions with the Local Planning Authority to consider alternatives for the site in order to secure a long-term, viable solution to unlock the site and to genuinely act as a catalyst for development of the wider Kirkley Waterfront and Sustainable Urban Neighbourhood. One solution includes the potential for shared ownership affordable housing, through an affordable housing business also owned by our client – Heylo Housing.

Heylo Housing is a residential property company with a long term investment strategy to provide affordable housing across the UK. In partnership with Local Authorities and backed by significant pension fund investment, Heylo work with national and regional developers to deliver shared ownership affordable housing. Heylo is a registered provider with the Homes and Communities Agency and has already acquired over 900 shared ownership affordable housing properties and is currently active in more than 120 Local Authorities.

House prices in Waveney continue to grow and remain high compared to average household incomes. This means housing is unaffordable to many people in the District. Therefore, building shared ownership homes can help make the goal of ownership a reality for local people, including many hard pressed public service workers, who may be on salaries below the national average.

Shared ownership substantially increases the number of people who can buy a property by sharing the costs of the purchase and reducing the deposit, since it is only required for the portion of the property being bought. As the building of shared ownership homes unlocks a huge level of demand, it can increase housing provider sales rates, which in turn incentivises build out and faster rates of supply, thereby countering any inflation of demand which would otherwise lead to inflation of local house
prices. This approach would therefore offer a strong prospect of quantified early delivery and a significant acceleration of housing delivery.

Our client strongly believes the shared ownership tenure is sufficiently flexible to reach and attract a diverse range of income households and also demographic groups. This can be achieved through:

* Marketing of the standard form product to older households as well as the typically targeted 25-45 age group;

* Application of the Older Persons Shared Ownership model (OPSO, where Heylo Housing could access specialist grant support from the HCA);

* Use of a rent-to-buy model so that younger working households with low or no deposit could access housing and build up ownership overtime;

* Application of the HOLD model (home ownership for persons with learning difficulties (once again where Heylo Housing could make the case to the HCA for specialist grant support);

* Use of Heylo Housing's Let'sShare model, with Local Authority participation to deliver rented, affordable housing to local waiting list or temporary accommodation

The above makes shared ownership ideally placed to be the base tenure to fulfil part of the place making aims of the Council, especially around the creation of a sustainable and balanced community of varied and residentially stable households.

Finally, the Local Plan refers to the fact that land along the waterfront of our client’s site has a higher risk of flooding and is therefore less suitable for residential development. However, it should be noted that plans are in place for a strategic flood risk defence for Central Lowestoft which will significantly reduce flood risk in the area. The Lowestoft Flood Risk Management Project involves the construction of a tidal barrier on the seaward side of the Bascule Bridge and the construction of 1.5km if floodwall. Furthermore, any planning application on the site would be accompanied by a site specific flood risk assessment which would need to demonstrate that the flood risk could be satisfactorily mitigated over the lifetime of the development.

Design can also mitigate against flooding in areas of higher risk, as was the case with the Brooke Peninsula scheme, and the waterfront area of our client’s site would lend itself equally to residential development.
In light of above, our client proposes some suggested new wording to Policy WLP2.4. The Policy as currently drafted is overly prescriptive and not sufficiently flexible. The Policy is therefore not effective, as required by the NPPF (paragraph 182). Furthermore, it should be noted that further detailed design guidance is provided in the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief in any event.

Recommended revised wording is indicated below, in bold text.

Policy WLP2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood

Land comprising the Kirkley Waterfront and Sustainable Urban Neighbourhood (59.76 hectares) as defined on the Policies Map is allocated for mixed use development including;

Minimum of 1,380 new dwellings

Retirement community comprising a care home / nursing home and extra care and/or sheltered

5 form entry primary school

Playing field

Local retail centre comprising a convenience store, cafes and other local services

Marina facilities

Up to 5 hectares of employment development (falling under use classes B1, B2 and B8) and port related development.

Residential development should be predominantly located to the west of the site including on the former Sanyo site, the Brooke Business Park and Jeld Wen Playing Fields, the former SCA Recycling Site, and the former Witham Paints Factory site.

The primary school, playing field and local centre should be located centrally within the residential development around the main access road.

New employment development/redevelopment (falling under use classes B1, B2 and B8) and port related development should be focused on the waterfront area of the former Jeld Wen Factory Site. Proposals involving
the redevelopment or change of use of existing employment premises on Riverside Road, Lowestoft Enterprise Park, and Quayside Business Centre the site, falling within Use Classes B1, B2 or B8, for uses not falling within Use Classes B1, B2 or B8 will only be permitted where:

* Marketing evidence is provided which demonstrates the premises have been marketed for a sustained period of 12 months in accordance with the requirements set out in Appendix 6; and

* The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity

New development and redevelopment within the site should be developed in accordance with the following site specific criteria:

* The site should be configured around a legible street pattern which incorporates key views of the waterfront and provides good walking and cycling

* Residential development should be designed to densities of between 40 and 90 dwellings per

* A central transport node with sheltered bus waiting facilities should be provided within the site close to the proposed primary

* Development should provide active frontages along Waveney

Employment development should consider neighbouring residential uses and appropriate landscaping and buffers should be employed to avoid amenity issues.

* Development should provide a continuous east-west waterfront pedestrian and cycle route across the appropriate signage and wayfinding measures should be provided to help navigation between the seafront and the Broads. The waterfront path should include a multifunctional hard surfaced public space.

* A new access road from the Jeld Wen Playing Fields is required to serve the majority of the residential

* A network of children’s play areas totalling 1800sqm should be provided in accessible, well-overlooked locations throughout the residential parts of the

* Development should facilitate the enhancement of the Brooke Yachts and Jeld Wen Mosaic County Wildlife Site to mitigate the loss of part of the site
which is needed to facilitate the construction of the access

* Development should support and enhance ecological networks throughout the

* Slipways on the Brooke Peninsula should be retained and made available for use by the public and

* A Transport Assessment and Travel Plan should be submitted with any planning application

Development on the site should also be in broad conformity with the guidance and the outline masterplan detailed in the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief. Revisions may be made to the Development Brief through a revised Supplementary Planning Document or as part of a Neighbourhood Plan.

Summary and Conclusions

These planning representations have been prepared in respect of Land off Waveney Drive, Lowestoft ('Former Jeld Wen Factory site') in response to the emerging Waveney District Local Plan (First Draft version July 2017). The site falls within the Kirkley Waterfront and Sustainable Urban Neighbourhood which is proposed as a strategic site allocation for mixed use development under Policy WLP2.4.

This representation and market evidence direct that proposals for the Kirkley Waterfront and Sustainable Urban Neighbourhood as currently set out within the AAP and emerging Local Plan (Policy WLP2.4) are not delivering as expected and as such greater flexibility is required in order to support alternative, viable solutions for the long-term development of this important part of Lowestoft.

Our client therefore makes a series of observations on the Plan and proposes revised wording to Policy WLP2.4 in order for the Plan to be sufficiently flexible.

Statuslist Ltd look forward to working with Waveney District Council and relevant stakeholders to take forward a successful development at Land off Waveney Drive, Lowestoft through both the local plan and application process.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135162/PDF/-

http://consult.waveney.gov.uk/gf2.ti/af/799778/135164/PDF-/Appendix_1_Site_Location_Plan.pdf

Suffolk County Council Robert Feakes

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1670

Comment Development could discharge into Lake Lothing unrestricted, would have to size attenuation for tide lock scenario. Tidal flood zone 2 and 3.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1698

Comment Existing brown field sites south of Lake Lothing, including Broke Marine and former Sanyo Factory sites previously consulted on and the adjacent Jeld Wen site. The total size of the site is 1380 dwellings with access from Waveney Drive and Victoria Road. An internal spine road (linking through the sites) and permeability for sustainable modes required. Layout of development may need to be reconsidered in light of emerging access proposals for the Lake Lothing Third Crossing. Original masterplan included a pedestrian and cycle bridge linking the sites to Normanston Park

Full Transport Assessment and Travel Plan required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1647

Comment Policy 6 of the Minerals Core Strategy safeguards minerals wharfs and railheads. The minerals wharf Hamilton Docks and North Quay in Lowestoft is within 250m of the Retail and Leisure Allocation Policy WLP2.16 and Mixed Use Allocation Policy WLP2.4 respectively. It is unlikely that the development of these sites will cause the loss of the minerals wharfs, hence the allocations are not opposed. However the District Council should be aware of the proximity to a safeguarded facility. The District Council should include policy requirements to ensure that this is assessed and to require that development which causes the loss of that facility will require a satisfactory alternative to be made available, or at least highlight the Minerals Plan policy.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1656

Comment Policy WDM1 of the Waste Core Strategy states that the County Council "will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made." The following site allocation policies are within proximity of waste facilities. Proposals on these sites must ensure that they do not prevent or prejudice the use of nearby waste facilities:

- Mixed Use Allocation Policies WLP2.4 and WLP2.6 – these sites are within 250m of Oulton Broad Waste Transfer Facility, however the sites are on the opposite side of Lake Lothing, so they are unlikely to affect each other.

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP2.4 - Kirkley Waterfront and Sustainable Urban Neighbourhood

Comment ID 1250

Comment As recognised in this policy and its supporting text, the area includes the Brooke Yachts and Jeld-Wen Mosaic CWS. We also understand that part of the area covered by the policy (including the CWS) already has outline planning consent for redevelopment.

Whilst paragraph 2.30 recognises that the CWS provides habitat for a 'good' population of common lizard, it does not recognise that it supports a range of other species including a number of UK Priority (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) breeding birds. The existing consented development includes the loss of part of the CWS to allow for the construction of an access road, whilst measures have been secured within the consent to maintain the rest of the CWS the revision of this policy should be used as an opportunity to consider a holistic approach to redeveloping the whole area to retain a greater proportion of the CWS. In particular we query whether access to the Brooke Business Park area could be achieved through the former Sanyo factory site, rather than across the CWS?

We agree with the policy wording that development should support and enhance ecological networks through the site and that development should facilitate enhancement of the CWS. However, we also consider that the policy should seek to protect the CWS from development.

Attached documents
Policy WLP2.5 - East of England Park

Amanda Frost

Section Policy WLP2.5 - East of England Park

Comment ID 448

Comment I think the tasteful development of this area is vitally important and it should connect easily to the High Street so that it flows from one area to the other. At the moment I feel that it is rather stuck out on a limb. The Birds Eye factory is a real eyesore and they should be encouraged to help with the cost of improving the negative visual impact the factory has on this area.
Beccles and Bungay Cycle Strategy Ian Reid

**Section**  Policy WLP2.5 - East of England Park

**Comment ID**  1014

**Comment**  Ness Point is the destination for many cyclists on long distance east-west cycle rides yet the final few hundred metres of these long rides is very poor quality. We welcome the vision to enhance the area as a "contemporary park" but would like to see cycle links to Ness Point improved particularly from the west and the south.

**Attached documents**
Beccy Francis

Section  Policy WLP2.5 - East of England Park

Comment ID  587

Comment  I note on your plan a mention of the coastal strip between South Beach and North Denes (North Denes Tourism and Ecological Enhancement Area/East of England Park). This stretch of coast is the only untouched (or almost untouched!) part of coastline in the north of the town and is enjoyed by many residents. The existing caravans are already a blotch on the area and to introduce anything else would be destroying a popular natural open space for residents from the north of Lowestoft. We do not have an abundance of coastline between Pakefield and Winterton where one can just walk. South of the Birds Eye factory is currently an eyesore and I have often wondered why we do not make a bigger tourist feature of Ness Point (and the area immediately surrounding it), but please leave the area north of the Birds Eye factory untouched; The border of WLP2.5 should not be so far to the north – we feel like you are taking away all of North Lowestoft’s fresh air and creation in your latest Local Plan.

Attached documents
Dr P R and Mrs A Winslade

Section Policy WLP2.5 - East of England Park

Comment ID 104

Comment We wish to point out that there are discrepancies between the map on page 45 and the map on page 47 (and also page 82 of your map book).

The map on page 45 shows the East of England Park to be much larger than on the other maps, running as far as Links Road to the North.

Your Policies maps show the area to the North of the East of England Park, as defined in both the Policies maps and your First Draft, page 47 (and page 82 of your Map book), as being Open Space, other than the area of the current Tingdene Caravan Park. This correctly reflects our understanding of the current status of the land and we believe your map on page 45 is incorrect.

We have made a submission under the Open Space section, for you to encourage Lowestoft Town Council to give Local Green Space status to the area of the N. Denes shown on your Policies Map as Open Space, in their Neighbourhood/Local Plan.

Attached documents
Edward Oxland

Section Policy WLP2.5 - East of England Park

Comment ID 1204

Comment 2 The East of England Park- While I am very much in favour improving the area (it certainly needs restoration) the caravan park should NOT be allowed to expand or further encroach on the Denes which are protected by Covenants for the people of Lowestoft.

These comments also apply to the following area.

1 North Denes Tourism and Ecological Area-

Mr E.A. Oxland

Attached documents
**Gisleham Parish Council Derek Ward**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP2.5 - East of England Park</th>
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| Comment ID | 1110 |

| Comment | Lowestoft has great beaches and fine countryside surrounding the town. More emphasis to the leisure industry could be made to encourage and extend the holiday season within the region. Cycle and walking routes on coastal and country lanes could be created with the proposed Ness Point park as a focal point for starting or finishing a route. |

| Attached documents |  |

www.eastsuffolk.gov.uk/newwaveneylocalplan
Historic England

Section       Policy WLP2.5 - East of England Park

Comment ID   1377

Comment       We welcome the identification of the historic High Street, Scores and local importance of the fishing net drying racks in the supporting text and policy for East of England Park. No reference is made in either the supporting text or policy that it is partly in the conservation area. We recommend that this is included.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP2.5 - East of England Park

Comment ID 1306

Comment Page 57 WLP 2.5 East of England Park, mentioned in WDC’s biodiversity report for local plan by Suffolk Wildlife Trust as having important acid grass, important for fauna, avifauna and importance of connectivity with the North Denes

The LTC urges an integrated approach to development in the Denes area that respects the natural biodiversity as well as the tourist and public demands.

Greening the streets of Lowestoft has visual and functional benefits. In terms of climate change, street trees help by providing shade from the sun, slowing surface water runoff, and combating the urban heat island effect. They also provide additional habitat for wildlife. Where underground services are a potential issue, the use of planters will be explored. The appearance of streets will also be improved through limiting the amount of ‘street clutter’, including unnecessary signage, bollards, railings, road markings and street furniture.

Attached documents
Mike Shaw

Section Policy WLP2.5 - East of England Park

Comment ID 813

Comment Plans to place static caravans on N.Denes and surrounding areas run counter to conditions attached to the provision of the land to the peoples of Lowestoft.

Statements alluding to use by tourists are misleading! They are statics intended for long-term use by semi-permanent residents. Letting to tourists in this area has been proven to be unviable. I am therefore definitely not in favour of any fencing off, leasing or other use of these spaces in contravention to the terms mentioned above.

Faithfully M.A. Shaw

Attached documents
Peter Eyres

Section Policy WLP2.5 - East of England Park

Comment ID 829

Comment I query the appropriateness of adding lighting to the section of the seawall north of Bird's Eye. The lights in Bird's Eye's carpark are carelessly positioned so that light spills over from their land onto public land, where it causes glare, blinding rather than helping people trying to enjoy the seawall at night. This should be remedied rather than adding light pollution in an area important for migrating birds.

Tingdene should be persuaded to replace their highly inappropriate fence with a post-and-rail fence such as served the previous caravan park perfectly well. At the very least, they should be required to conceal the fence with landscaping as set out in the Note on Implementation.

As far as access is concerned, it is a long way round the Bird's Eye building to walk from the High Street to the seafront. What is needed is a route through the Bird's Eye site to connect directly with one of the scores.
<table>
<thead>
<tr>
<th>Sheila Oxland</th>
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<td><strong>Section</strong></td>
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<tr>
<td><strong>Comment ID</strong></td>
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<tr>
<td><strong>Comment</strong></td>
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</tbody>
</table>

**Attached documents**
Suffolk County Council Robert Feakes

Section Policy WLP2.5 - East of England Park

Comment ID 1671

Comment Development could discharge into sea unrestricted, would have to size attenuation for tide lock scenario. Tidal flood zone 2 and 3. Combined AW sewer, ideally should separate surface water from this.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.5 - East of England Park

Comment ID 1699

Comment Unlikely to significantly impact upon highway

Transport Statement required

Attached documents
Suffolk Wildlife Trust James Meyer

Section          Policy WLP2.5 - East of England Park

Comment ID      1251

Comment          Whilst we have no objection to the principle of this policy, it should recognise the site's ecological value and ensure that this is protected and enhanced as part of any works at the site.

Attached documents
Policy WLP2.6 - Western End of Lake Lothing

Amanda Hawes

Section Policy WLP2.6 - Western End of Lake Lothing

Comment ID 24

Comment I see you say that if you build houses in elmham terrace that you have identified there is better access thru Crompton road/Stanley road...our road and Stanley road is already pretty much 24/7 congested with cars from us residents, cars from residents of Victoria road and cars from the drs surgery! so most of the time its almost impossible to drive thru as a lot of people double park opposite each other so it would be extremely hard to get emergency services large vehicles thru...lorries etc etc. our road is a small road. and its beautifully quiet too, so having it made into a rat run with a thru road at the bottom as well as Victoria road traffic would cause even more traffic pollution to us residents as well and obviously a lot more traffic noise from both ends then too. our sewerage can also not cope with more houses built as its blocked up a lot and water holds around our houses with a lot of wet weather too, so making even more of the land around us into concrete isn't a great idea either. what we need is a carpark with landscaping on the land between Crompton/Stanley so that the drs patients and residents of Victoria road can park safely and responsibly on what is already a very over populated area with nowhere for them to park! making more traffic and adding more humans will add nothing but grief and upset to our beautiful quiet, and lovely view out of our windows of the boats on the broad, and cause even more asthma related complaints due to another thru road of hundreds of cars going past spreading so much more pollution. there are lots of empty factories around Lowestoft just waiting to be built on. no need to ruin a village like small roaded community like Crompton / Stanley road.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP2.6 - Western End of Lake Lothing

Comment ID 1452

Comment We have discussed development opportunities with land owners in this area on various occasions and have not found them to be viable. Delivery here remains ransomed by the need to acquire additional land for vision splays and highway improvements. Whilst we understand the logic behind the use of residential development to regenerate the waterfront, following the demise of more traditional activity, we remain concerned that this allocation effectively locks up housing numbers which are unlikely to come forward.

Attached documents
Environment Agency

Section  
Policy WLP2.6 - Western End of Lake Lothing

Comment ID  862

Comment  
We support the approach to flood risk at this site. Where the more vulnerable development is sequentially sited away from the areas of highest flood risk, developers still will need produce a site specific flood risk assessment, demonstrating the site is safe in a flood event.

Attached documents
Kevin Sullivan

Section Policy WLP2.6 - Western End of Lake Lothing

Comment ID 611

Comment No sign of a flood barrier as yet to protect this area?

No sign of investment in the area?

Area still a mess The unadopted access roads South Elmham Terrace are being worn out by trucks to industrial units with poor access Why is this allowed they must pay council rates for this industrial area?

Plans with no investment not good need that third crossing to move forward not backward by two years And the area plan carried out Action not plans.

Attached documents
Norman Castleton

Section Policy WLP2.6 - Western End of Lake Lothing

Comment ID 429

Comment The Western End of Lake Lothing: I think this area should solely concentrate on the water front activities such as marine engineering, marine chandlers and servicing the commercial shipping and leisure boat activities.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.6 - Western End of Lake Lothing

Comment ID  1672

Comment  Development could discharge into Lake Lothing unrestricted, would have to size attenuation for tide lock scenario. Tidal flood zone 2 and 3.

Attached documents
Suffolk County Council Robert Feakes

Section          Policy WLP2.6 - Western End of Lake Lothing

Comment ID     1700

Comment    Improvements to South Elmham End of Lake Lothing Terrace required (surface/footways). Encourage sustainable route along south bank of Lake Lothing.

Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.6 - Western End of Lake Lothing

Comment ID 1657

Comment Policy WDM1 of the Waste Core Strategy states that the County Council "will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made." The following site allocation policies are within proximity of waste facilities. Proposals on these sites must ensure that they do not prevent or prejudice the use of nearby waste facilities:

- Mixed Use Allocation Policies WLP2.4 and WLP2.6 – these sites are within 250m of Oulton Broad Waste Transfer Facility, however the sites are on the opposite side of Lake Lothing, so they are unlikely to affect each other.

Attached documents
Policy WLP2.7 - Former Battery Green Car Park

Amanda Frost

Section
Policy WLP2.7 - Former Battery Green Car Park

Comment ID
449

Comment
With regard to point 2.42 and the development of car park site and suggestion of a cinema, we already have a cinema close the town centre in London Road South. Is there a need for a second cinema? And would this not put the existing cinema out of business?

Attached documents
**Historic England**

**Section**  
Policy WLP2.7 - Former Battery Green Car Park

**Comment ID**  
1378

**Comment**  
This site is opposite grade II St Margaret’s House and redevelopment of this site is an opportunity to improve its setting. Reference to St Margaret’s House currently is missing from both the supporting text and policy. We would recommend that it is included and consideration given to its setting. As such we are concerned about the policy aspiration to "create a landmark building for the town". The current structure is imposing and unwelcoming and any replacement should aim to work with the surrounding area. Careful consideration of height, massing and elevation will be critical in this location to make a positive intervention in the town centre. Whilst we welcome the commitment to an active frontage and highest possible architectural design, this would benefit from further refinement to achieve a positive outcome.

**Attached documents**
Making Waves Together Helen Johnson

Section Policy WLP2.7 - Former Battery Green Car Park

Comment ID 1000

Comment Policy WLP2.7: A multiplex cinema on the Battery Green site is included in the plan, but there needs to be more conversation about how this impacts positively or negatively on local providers that run a cinema programme. Furthermore, there is opportunity to incorporate the theatres near this locality into this policy area and create a cultural quarter that can help stimulate the night time economy.

The theatre infrastructure in Lowestoft can contribute towards growing the night time economy but there needs to be a more attractive offer, for national retailers including restaurants to invest in the town both in terms of long term planning but also financial incentives.
Norman Castleton

Section  
Policy WLP2.7 - Former Battery Green Car Park

Comment ID  
189

Comment  
Former Battery Green carpark and environs

I can never understand why this carpark was allowed to deteriorate to such an extent that the only option thought viable was to demolish it. This seems to be of the same strand as other assets in the town which have been allowed to deteriorate and then be pulled down and something inferior put in its place or nothing done at all. It would be a good site to rebuild a modern multi-story carpark to back Lowestoft Vision and attract people back into the town centre. It would be a nice change new developments in Lowestoft built to the highest architectural standards as paragraph 1.

Attached documents
Norman Castleton

Section  Policy WLP2.7 - Former Battery Green Car Park

Comment ID  604

Comment  Former Battery Green Multiple Story Car Park: I think an inquiry should be held as to why the multi-story car park only built in 1982 should be in such a state as to require pulling down. In fact if it had been built in reinforced concrete it would probably now be listed as a fine piece of Brutalist architecture. Thinking in terms of retail units seems ridiculous when it is a job to fill the existing retail units in London Road North, London Road South & the High street. There also seems to be a silly determination by the council to develop out of town centre sites for retail use. No more social housing on this site please. Perhaps an entertainment centre of some sort or judging by the parking in London Road North and adjacent street another multiple story car park might be a good idea.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.7 - Former Battery Green Car Park

Comment ID  1701

Comment  Accessed from A47 (trunk) Consider access according to use
Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.7 - Former Battery Green Car Park

Comment ID 1673

Comment Brownfield site utilise existing drainage seeking betterment

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.7 - Former Battery Green Car Park

Comment ID  1646

Comment  Policy 6 of the Minerals Core Strategy safeguards minerals wharfs and railheads. The minerals wharf Hamilton Docks and North Quay in Lowestoft is within 250m of the Retail and Leisure Allocation Policy WLP2.16 and Mixed Use Allocation Policy WLP2.4 respectively. It is unlikely that the development of these sites will cause the loss of the minerals wharfs, hence the allocations are not opposed. However the District Council should be aware of the proximity to a safeguarded facility. The District Council should include policy requirements to ensure that this is assessed and to require that development which causes the loss of that facility will require a satisfactory alternative to be made available, or at least highlight the Minerals Plan policy.

Attached documents
Policy WLP2.8 - Historic High Street and Scores Area

Amanda Frost

Section Policy WLP2.8 - Historic High Street and Scores Area

Comment ID 450

Comment If the Town Hall, which has been left to fall into a shameful state of disrepair, were to be restored, it could form a large part of regeneration in this area. It is a massive building and of great architectural and historical interest and if restored, could have multiple uses and encourage footfall and focus to this part of the town. I would not write off empty shops and allow for change of use into residential as that would seem to be writing off this area as not being viable for business, the arts, retail and any number of other activities.
Historic England

Section Policy WLP2.8 - Historic High Street and Scores Area

Comment ID 1379

Comment We welcome a policy on the historic High Street and Scores. The area, as identified in the plan, is under threat from inappropriate development and poorly maintained buildings. We particularly welcome the commitment to retaining and enhancing the historic shop fronts, which are characteristic of the area. The policy does not mention the designated heritage assets – conservation area and listed buildings – and the supporting text could be more detailed to set out the qualities of the historic environment, your aspirations for the area, and how the historic environment is part of this. We would be happy to discuss further your aspirations for this area and how the policy and supporting text could be improved to achieve heritage-led regeneration of the area.
Lowestoft Town Council Shona Bendix

Section
Policy WLP2.8 - Historic High Street and Scores Area

Comment ID
1291

Comment
1.12 About 500 net new jobs will be in sectors requiring new employment premises (B1, B2, B8).

Lowestoft will continue to need large scale office space in the Power Park, LNR and High Street area. We urge that the Council prioritize business and employment over the needs for housing in these areas. In the High Street, LRN, LRS and historical areas we urge that heritage buildings will prioritize ground floor as dedicated to business/retail space and the upper floors to residential.

Attached documents
Norman Castleton

Section Policy WLP2.8 - Historic High Street and Scores Area

Comment ID 149

Comment Historic High Street & Scores Area

I agree with most of paragraphs 2.44 to 2.52. It is important that the Town Hall building is brought back into use. Perhaps as a community centre, art gallery and or museum. Seeing that it is admitted that this is a poor and deprived area it is shocking that the destruction of an historical Coopers Building to build a drive through Burgher King bar was allowed to go ahead. According to the article in the Eastern Daily Press of July 26 page the "Rise In Takeaways in our most deprived areas is linked to health inequality" [Cambridge University Centre for Diet & Activity Research links between junk food from takeaways and obesity, diabetes and chronic bad health. 2017]. Therefore, this needs a rethink perhaps a suitable site for high tech start-ups with good transport links.

Some of the buildings in the High Street are outstanding enough to be mentioned in [B.O.E. Pevsner, Pernguin] nos 80, 55, 49 & 27. The Crown Hotel could surely serve as a restaurant again within a revived area. A repaint of the shop fronts would also help.

Most of the scores are in reasonable condition except Mariners Score which has a broken down wall & doorway filled with overgraon vegetation and fly tipped rubbish. Crwon Score is in a shocking state with broken down walls covered with dodgy temporary fencing.

This area has a lot of potential if only it is believed in and the will to action found.

Norman Castleton

Section  Policy WLP2.8 - Historic High Street and Scores Area

Comment ID  118

Comment  Historic High Street and scores

If as the draft plan states this in one of the most deprived areas in Lowestoft re Waveney why was planning permission granted for a drive through Burger King bar which of course has now shuddered to a halt because due diligence was not carried out into the viability of the franchise holder. An article in the Eastern Daily Press of July 26th 2017 is headed "Rise in takeaways in our most deprived areas is linked to health inequality". [Scott, Geraldine, Archant 2017] "Health experts have warned that the fight against rising obesity levels and related diseases being lost as the number of takeaways soar". Planning regulations can and have been instituted in other areas to limit such establishments and the consequent bad eating habits [UKs facility for Public Health, 2017]. Plan for healthy living not down to the lowest denominator.

The scores

As the draft plan states the 'Scores' are important as a historic amenity. Mariners score and the Crown scores are in a poor state and need immediate remedial attention. Visitors regard these scores as important historic areas to be experienced.

Attached documents
Peter Eyres

Section Policy WLP2.8 - Historic High Street and Scores Area

Comment ID 830

Comment As far as access is concerned, it is a long way round the Bird's Eye building to walk from the Town Hall end of the High Street to the seafront. To improve connectivity between the High Street and East of England Park, a route is needed through the Bird’s Eye site to connect directly with one of the scores. There is a large green space in the middle of the Bird’s Eye site and it should not be beyond the wit of willing parties to find a route across or through it.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.8 - Historic High Street and Scores Area

Comment ID 1702

Comment Unlikely to significantly impact upon highway

Attached documents
Policy WLP2.9 - Inner Harbour Port Area

Amanda Frost

Section  Policy WLP2.9 - Inner Harbour Port Area

Comment ID  451

Comment  This area is generally extremely unsightly either side of Lake Lothing (Belvedere Road and Commercial Road). As this is the main road into Lowestoft it would be so good if its appearance could be improved.

Attached documents
Bob Taylor

Section Policy WLP2.9 - Inner Harbour Port Area

Comment ID 483

Comment Shouldn’t we be considering developing the Southern dock area between the bridge and Asda and the the other side of Asda to become a major recreational area for Lowestoft. Multi screen cinema, sports facilities (for example relocating Water Lane pool etc) Creche, restaurants, bowling (all types) and much much more.

This would take advantage of the waterside views, riverside walking areas and attract people to Lowestoft to bring people here. We currently have people leaving Lowestoft to enjoy themselves in Norwich and Beccles. There is little for visitors to do in bad weather times.

The location is near to the Station and bus routes and would create a real jewel in the town.

Yes we need housing, yes we need all the other facilities you are considering but lets make the best of our unique aspects rather than putting housing as the major factor along what could become a fantastic visitor attraction.

Attached documents
Norman Castleton

Section  Policy WLP2.9 - Inner Harbour Port Area

Comment ID  437

Comment  Inner Harbour Port Area: There is no reason apart from a lack of vision why this part of Lowestoft should not be one of the busiest on the East Coast. The facilities and communication links will already be present to optimise business development. If the land on the South Quay is utilized as a business park (not for ghetto style housing) and the North Quay used as the site for back up to river, road & rail trade then this could be the core for economic revival in the Lowestoft.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.9 - Inner Harbour Port Area

Comment ID 1703

Comment Ensure sustainable links are provided
Transport Assessment required

Attached documents
Policy WLP2.10 - Oulton Broad District Shopping Centre

Broads Authority Natalie Beal

Section Policy WLP2.10 - Oulton Broad District Shopping Centre

Comment ID 470

Comment Page 63 onwards. Support the policy relating to Oulton Broad District Centre.

Attached documents
Norman Castleton

Section  Policy WLP2.10 - Oulton Broad District Shopping Centre

Comment ID  381

Comment  Oulton Broad District Shopping Centre

Restriction on growth of takeaways and burger bars to include an effect on human health assessment plus a ban on the use of Palm Oil in the cooking or any other process to help save the Rain Forests of the World.

Attached documents
Policy WLP2.10 - Oulton Broad District Shopping Centre

Comment ID: 147

Comment: 2.60 and policy WLP2.10 both talk about the need to promote new restaurants and cafes in the area. Whilst a good variety of these establishments will help encourage people to visit, there is actually a good assortment of cafes and restaurants already in place. What is really needed is an increase in the variety of retail establishments. There is a lack of provision for specialty food retail (e.g. delicatessen, butchers) which would provide more variety for people to come and use the area for regular and top-up shopping trips... giving the opportunity to get more things in one trip. Non food retail is lacking in terms of basic provisions for tourists visiting on boats (e.g. towels, clothing and products not covered by the Spar mini-market). Locals and tourists will use cafes, but will only drink in one before wanting something else to go and look at, an increase in retail variety will help hold people in the area for longer. The policies laid out here must not ignore the need to promote and encourage the increase of general retail, both food and non food. The centre of Oulton Broad must be about more than just restaurants and cafes if it is to survive.
Suffolk County Council Robert Feakes

Section Policy WLP2.10 - Oulton Broad District Shopping Centre

Comment ID 1704

Comment Unlikely to significantly impact upon highway

Attached documents
Policy WLP2.11 - Kirkley District Shopping Centre

Amanda Frost

Section Policy WLP2.11 - Kirkley District Shopping Centre

Comment ID 452

Comment This area is up and coming and given its proximity to the beautiful beach should have very careful consideration given to what uses are allowed here. The main negative in the area is large number of houses of multiple occupation. This is detrimental to the area and should be restricted in future.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP2.11 - Kirkley District Shopping Centre

Comment ID 1530

Comment Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Kirkley, High Street and LNR shopping areas, provided there is a ground floor retail use in accordance with the above.

Proposals for the change of use of ground floor retail units to community facilities will be permitted provided that:

- the unit does not occupy a prominent position in the Centre;

- satisfactory vehicular access and car parking can be provided;

- the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months; and iv. the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.

- is appropriate in scale and supports the needs of the adjacent residential area;

- is accessible to all sectors of the community.

The class categories of drinking establishments and hot food takeaways has been set at 20% of retail frontages. This will assist in controlling the night-time economy and allow for critical mass of daytime open shops to encourage foot traffic and a thriving retail street.

Attached documents
Norman Castleton

Section Policy WLP2.11 - Kirkley District Shopping Centre

Comment ID 191

Comment Kirkley District Shopping area

This could be a nice shopping and leisure area. The main problem is the area has a bad reputation through the bad behaviour and doubtful elements who live the local rented accommodation. If this were changed then Kirkley and the area between Miil road including KFC cleaned up there could be a bright future.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.11 - Kirkley District Shopping Centre

Comment ID 1705

Comment Unlikely to significantly impact upon highway

Attached documents
Policy WLP2.12 - North Lowestoft Garden Village

Alan and Chris Woodhouse

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1105

Comment We would like to register our concerns for the development of land for housing. Our objections are as follows:

The scale of development we consider to be too large, 1,400 houses is a major development. Where is the access for this amount of vehicles to be? We are very concerned at the increased of traffic using Blundeston Road.

The development is also taking prime agricultural land and there will be a loss of wildlife including grass snakes and newts which we see in our garden.

In view of the high water table the surface water will have difficulty in draining away. After the frequent heavy rain we now experience Blundeston Road is often flooded.

Attached documents
Alex Lisantri

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 190

Comment North Lowestoft Garden Village

Concerns

1. ENTRANCES TO THE PROPOSED HOUSING DEVELOPMENT

As a resident of Corton (The Street) for the past 11 years and a frequent driver along Corton Long Lane, I witness regularly the traffic problems which mainly arise between the hours of 8:30 – 9 and mid afternoon Monday to Friday.

The problems mainly arise from the parking of cars outside the Kindergarten (a long established business), which is situated approximately opposite the proposed entrance to the new development, when parent/guardians are dropping off their children.

The road is extremely busy at this time due to it being the main road into the village from the A47, primary school children are being driven to school at this time from outside of the area, to The Street, where the school is based, or cycling or walking along Corton Long Lane to get to school. This is the main route out of the village for current residents accessing the A47 to get to Lowestoft or Great Yarmouth for work. Any increase in additional traffic is going to cause a major risk of accident/injury not only to children, but cyclists and motorists. Surely the most sensible and accessible routes of access/exits would be slip roads off the main A47.

2. DRAINAGE

Corton has a well established drainage problem. Coastal erosion meetings state that the cliff problems are due to bad drainage. Private funding has provided to date a successful temporary solution by netting and piling the cliffs in the area alongside Warners holiday camp. My concerns are with the additional proposed housing developments drainage needs, how is this going to affect the cliffs. I live on The Street, with only Warners as a sea
defence! Will the new development take into account this severe problem, and put in place measures to prevent collapse of the cliffs, and also provide an adequate solution for all the home owners this is likely to effect. Surely also with the removal of large trees, which are currently situated on the wetland and the proposed new development land, these trees absorb a lot of the water. Removal of the trees is going to be cause an even bigger problem.

3. CRIME RATE INCREASE

I moved to Corton as I wanted to live in a quiet old fashioned village, with the majority of residents being elderly and retired. I had previously lived in south Lowestoft. I chose Corton for its original kept character and for its location, having woods beach and countryside on my door step. Whilst I appreciate the need for new housing, I disapprove that part of Corton’s beauty is going to be destroyed by a new development, and it’s identity as a village will be lost.

As with any new developments there are always pitfalls with an impact to the surrounding immediate areas. I believe that Corton with it current low crime rate will be no longer in that privileged position, and with the increase in population unfortunately will bring with it an increase in crime, with mostly the vulnerable elderly being targeted.

With working away I feel that if the crime rate escalates I would not feel good leaving my wife alone in the week, how will this be policed. As the biggest development out of all the proposed sites I feel this needs to be seriously debated.

Attached documents
Alison Dixon

**Section**  
Policy WLP2.12 - North Lowestoft Garden Village

**Comment ID**  
446

**Comment**  
Have you thought of the coastal erosion when planning new homes in Corton? Also The Street, Corton is not built for extra traffic, the new roundabout at Corton Long Lane is already dangerous with the junctions it has now.

**Attached documents**
Allison Bayfield

Section  
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  
1220

Comment  
As a resident of Corton myself and my family moved here for a number of reasons including peace and quiet and a village life. After being in town for a number of years moving out of town was the best decision and have been in the village for just over 3 years. We love the area, its quiet and the attraction of the beach, farmland and woodland is fantastic! We are wildlife lovers and the proposed site will destroy a numbers of habitats and this is of great concern to us. The other concern we have is the farmer whose family has farmed the land for over 100 years is being told that the land is no longer available and that hundreds of houses are to be built. This is quite frankly disgusting. We recently met the farmer and he was destroyed as he hadn't been told about the proposals and had found out by a piece of paper pinned to a fence....again disgusting! He is a small buisnessman that is being kicked off the land that his family has had for years....its wrong!

Our village is small and the roads are tiny, how will they cope? The main roads into Lowestoft are not equipt for more houses they are too small and need major improvment. There are a number of elderly people who moved for a quiet peaceful life and DO NOT need a housing estate on their doorstep. Please reconsider this option as it is not needed or wanted!

Attached documents
Anglian Water Services Limited Stewart Patience

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1356

Comment Reference is made a wastewater recycling centre dominating the landscape to the north of this allocation site. This is a water treatment works as opposed to a water recycling centre. Therefore we would ask that the text in the plan should be amended to make this clear.

The Local Plan should include reference to the applicant for this site demonstrating that the proposed development would not adversely affect the normal operation of our operational asset. We would welcome further discussion with Waveney District Council regarding the wording of this allocation policy prior to the Local Plan being finalised.

Attached documents
Anne & Stewart Wrigley

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1077

Comment THE ENVIRONMENT

In your "Vision in summary" (page 3 of your plan) your first priority is to "improve the quality of life". Your proposal to build on this site does not "improve" the quality of life, it diminishes it by destroying the fields, ditches and hedgerows, replacing them with buildings and roads.

You also state you want to "protect and enhance the environment" how does your plan for WLP2.12 protect the environment? It doesn't, it destroys it! How does it "enhance" the environment? Again it doesn't, it digs it up and concretes over it.

So if the proposal for the Garden Village does not meet your own criteria it cannot be suitable as a suggestion.

The proposed site is a lovely green field site. This must not be built on. It provides a rural scene, which is attractive as you enter Lowestoft from the north. Building on this site will spoil forever this lovely entry to the town, and will never be able to be replaced.

We are a town that needs tourists to support our economy; large developments in inappropriate areas will not be a way of attracting tourists.

The land also supports a wide variety of wild life. Their habitats and feeding areas will be lost forever. This is not acceptable in the 21st Century. We have a duty to respect and preserve our environment.

We also have a duty to future residents of Lowestoft and to visitors to maintain our green fields and the attractiveness of our town.

As you say we must "protect" our environment.

ROAD SAFETY

Any proposed development must demonstrate that it is safe. The proposal
for the Garden Village is not safe.

The area proposed for development is renowned for road traffic accidents. Rackham's Corner, the Corton Long Lane junction and the roundabout connecting Blundeston Road with Oulton Broad regularly experience accidents, developing further this area, and the significant increase in traffic it will bring, will only create more accidents.

It is not acceptable to propose a development on both sides of one of the areas main routes, the A47. Access to the proposed school and shops will require pedestrians and cyclists to cross the A47 from one side to the other. Every crossing point will be a potential accident. If a residential area was already in existence it would be folly to plan a new main road through the centre of it – so why plan a development split by an existing main road?

The local roads around the development will be less safe for all users; they are already too busy. For example Blundeston Road is narrow; a tight squeeze in places when two vehicles meet, it has no safe pavement for pedestrians and is not fully lit.

Your first aim is to "improve the quality of life", by making the area less safe for all users this development fails to meet your own criteria.

TRANSPORT AND HEALTH

Your third vision is to "improve the health of the population". A simple and cost effective way of improving our health is to encourage more walking and cycling. This means placing housing developments in areas that are accessible on foot or by cycling to the amenities of the town. This proposed development is not close enough to the amenities of the town.

By proposing this development so far out of Lowestoft centre you are encouraging greater car use. This will put greater pressure on our roads and discourage healthier options like walking and cycling.

This development is not a healthy one for the residents. Residents will leave their front door, walk a few steps to their car and drive to work, the shops, restaurants etc. It fails to meet your third criteria.

LOCAL SERVICES

In your proposal for the garden village you mention shops and a school but greater thought needs to be given to all the other services needed to support 1400 homes. Hospitals, doctors and dentists are under pressure in the area with the current population. Your proposal will put a greater strain
on these and other services.

EMPLOYMENT

Lowestoft is an area of high unemployment. Planning large numbers of new housing will not solve the problem, it may well make the situation worse, same number of jobs, more people, means greater unemployment.

The first priority should be to create more jobs for the area, then plan if more housing is needed.

IN CONCLUSION

You set out what you want to achieve in your First Draft Local Plan

improve quality of life

improve the health of the population

protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.
B Glennon

Section  
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  
1102

Comment  
The above plan will add 300% to the Corton area housing. This will destroy the ambience of the village which seems of no consequence to the planners.

Farm land will be destroyed and the varied wildlife, king fishers, newts, owls, cuckoos, deer, foxes, birds of prey, bats and many more. There is the medieval village of Thorp, with church and ponds on this site.

Also I believe that site WLP2.12 was turned down, 6yrs or so ago as a golf course as it would be detrimental to the wildlife and environment.

Mr Bradley is signing this in agreement.

Attached documents
Barrington Blythe

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1199

Comment I am unsure by reading this document why there is a requirement at all for the North Lowestoft Garden Village?

Building on this green belt area will only cause congestion for Corton village and slow down traffic between Gt Yarmouth and Lowestoft. 70mph now but for how long and then it will be 30 mph on the A 47 between Lowestoft and Gt Yarmouth. Business again will be the victim.

The A47 will not be able to cope with the additional traffic from the initial 740 new homes (probably an average of 2 per family home).

The proposed development will encroach on the back of Corton village in more ways than one, Pedestrians-cars-trucks from the proposed future businesses.

We have significant unemployed people in greater Lowestoft so the result of bringing new business should be to get the current unemployed back into work, these people exist and live in and around Greater Lowestoft SO WHY DO WE NEED THE ADDITIONAL HOUSING.

If additional housing is required then build on existing brown feels sites such as Boulton and Paul Site, Zephyr Cams site, I am sure that there are many more sites that could be made available without taking the countryside and eventually enveloping a quiet country village like Corton into a much larger housing and industrial area.

For the avoidance of doubt, We choose to buy or houses and live in quiet country villages and not in large multi populous areas.

I am no against expansion, however I am waiting to view further planning proposals and get some meat on theses proposal document bones.

Regards
Barrington H Blythe

Attached documents
### Beccles and Bungay Cycle Strategy Ian Reid

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<tr>
<th>Section</th>
<th>Policy WLP2.12 - North Lowestoft Garden Village</th>
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<tr>
<td>Comment ID</td>
<td>1017</td>
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<tr>
<td>Comment</td>
<td>Policy WLP2.12 involves a significant new neighbourhood either side of the A47. BBCS consider that an essential part of this development would be a grade-separated pedestrian and cycle crossing over (or under) the A47. The proposed new primary school should be located close to this crossing to help achieve very high levels of walking and cycling to the school. BBCS suggest a well designed subway with good visibility would be the best option.</td>
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**Attached documents**
Beccy Francis

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 560

Comment We are sympathetic with the pressure that local authorities are under to provide more housing and amenities, but question the logic of bringing this to our town before we have good road links to the town and a good road network within it. Currently we attract only a certain sector of the population because of our lack of manufacturing and industry, and the new plan providing homes and amenities will only attract those who want employment in a narrow sector – mainly shop assistants and nursing home carers! The number of jobs provided by the new amenities is also unlikely to match the number of people living in the new homes, and thereby could create more unemployment in Lowestoft. The increase in population will be reflected by an ever increasing gridlock of traffic in our town. Retail and industry will not come to our town and thrive until we have better transport links to the town and within it.

We also understand that nationally there are schemes and rewards to local authorities who develop Garden Villages, so to include one in Lowestoft’s development plan might well be financially beneficial to the town as well as giving us Brownie points on a national scale. To select the land at Corton may seem the answer to the obligations that the local authority finds itself under, being as a high proportion of it belongs to Suffolk County Council, this would at least cut out negotiations with private land owners; however we would like to point out that to use this land would be the result of an impulsive and short sighted decision.

Corton is steeped in history, as many local families would be able to tell you; families who have lived in the village for generations and others, like ourselves, who are relatively new to the village but have been proud to research and own the history, and to continue to enjoy the dwindling remains of it today. Corton is also non-urban, a home to many species of wildlife, some quite rare, as well as trees and hedgerows which have grown over the last two centuries. Last but not least are the homes, farms and community buildings, which are scattered throughout the village and
around the outskirts, souvenirs to a modern population of the way this coastal village and community lived during the Georgian and Victorian era especially.

We personally live in a farmhouse in the centre of the proposed development, dating back to the 18th century and before. We often retrieve antique items when we dig in our garden, and somewhere in Corton apparently a Roman brooch has even been discovered. Should we smother this heritage we have and chase away our disappearing birds, insects and animals by destroying their habitats I ask? Why use grade one farming land, home to these species, beautiful to the eye, breathing the life which has slipped away from our modern generation, symbolic of our culture and destroy this precious legacy? As soon as our countryside is sacrificed to a development we must realise that it is destroyed for ever and cannot be brought back. Could I also politely ask whether any of the designers who are heading this campaign have actually visited the area, walked in the fields, and spent time just enjoying what we have outside the bustle of our little town?

The very size of the proposed Garden Village is a monstrosity and totally out of keeping. Corton has a little over 1000 residents and probably less than 600 homes. To introduce 1400 new homes and other facilities will literally triple the size of our small village. Our properties will be devalued and the reasons we all chose to live where we do will be of no significance. Those of us that live at the centre of the said proposal are also nervous that we will be put under compulsory purchase for all or part of our property or land. The whole scheme seems somewhat ruthless and we are forgivably anxious as to where the line will be drawn.

It may be appropriate to add here that I personally believe that the villagers in Corton are not sufficiently aware of what the proposal involves. Although there has been an attempt to inform residents through internet and leaflets, there still seems some confusion generally. Before things proceed any further, please could we have a question and answer session on two occasions (one during the day on a Saturday, and one in an evening, perhaps at the Parish Council Meeting) in the village pavilion, to ensure that all villagers have the opportunity to find out really what is happening. These sessions would need to be publicised ahead of time using various media to ensure that all villagers are aware. We personally would have not been aware of any proposals had our neighbour not alerted us – it would appear that we tend to be excluded at Taylors Farm to the West of the A47, even though we hold a Corton address.
We note that there is a similar size proposal for Kirkley Waterfront in the centre of Lowestoft and agree that this is an ideal location – somewhere that is urban and in dire need of development. There will be no detriment to history, wildlife or inhabitants in areas like this and the proposed development there would unarguably be an improvement. We most definitely cannot say this about the development of the Garden Village at Corton.

From the point of view of potential residents in this proposed new development, to have the A47 running through the middle of it is extremely short-sighted, and if the area must be developed in any way it should definitely be restricted just to one side of this busy road. At the very best the dual carriageway could be restricted to 30 or 40mph and take on a similar form to that north of us on the A47 outside the James Paget Hospital at Gorleston. We note that the new development is to include shops, a park and a school and with housing (presumably both sides of the A47) the need to cross this road would be often. Even with suitable crossings installed, in practice this would be nothing less than a death trap, especially for children.

This road is the main road north out of Lowestoft, and even from a pollution and noise point of view we do not understand how the council can actually plan for it to go through the middle of a village. The traffic comes past our house (between Corton Long Lane and Rackham's Corner) very fast, as drivers can see that they are out of town (at last!). Because the new development area is separated from the main urban area of Lowestoft by fields and green areas on some routes out of town, to a motorist it will be like re-entering a built up zone rather than a continuation of it. If the council decides to build a village on both sides of this very busy stretch of road I think they will be obliged to bypass it within a few years!

When we purchased our dream home 3 years ago, the only question we had in our mind was the sewage treatment plant on Stirrups Lane, even though our property is to the west of the A47. We would honestly say that occasionally if the wind is right we can smell an odour from our home, and definitely if I drive along Stirrups Land I keep my windows up! We find it absolutely bizarre that the council should consider building homes nearer than we are to the sewage plant and question seriously the saleability of the properties. Surely this plant was originally designed to be well away from residents and whatever buffers are put in place, nobody is actually going to want to live much nearer to it than they already do.

A Garden Village apparently will have a lower population density than other
developments, and we are presuming that a good percentage of the properties will therefore be sold for around or above the average market value. However, we do question how 1400 homes can be put into the proposed area if the density is really to be lower than on your average new development. Also, if homes are to be marketed in accordance with the ideal Garden Village picture, how can a potential buyer really be blindfolded not to see the A47 or the sewage treatment plant? A Garden Village is a beautiful idea but I do question whether you have the right location!

I note on your plan a mention of the coastal strip between South Beach and North Denes (North Denes Tourism and Ecological Enhancement Area/East of England Park). This stretch of coast is the only untouched (or almost untouched!) part of coastline in the north of the town and is enjoyed by many residents. The existing caravans are already a blotch on the area and to introduce anything else would be destroying a popular natural open space for residents from the north of Lowestoft. We do not have an abundance of coastline between Pakefield and Winterton where one can just walk. South of the Birds Eye factory is currently an eyesore and I have often wondered why we do not make a bigger tourist feature of Ness Point (and the area immediately surrounding it), but please leave the area north of the Birds Eye factory untouched; The border of WLP2.5 should not be so far to the north – we feel like you are taking away all of North Lowestoft’s fresh air and creation in your latest Local Plan.

In conclusion, I support the idea wholeheartedly of improving road links to Lowestoft, within Lowestoft and attracting a wider sector of business opportunity. I agree with the need to provide housing in line with a growing population. I think that the council should concentrate on development within urban areas or at least nearer to the town, in order to obliterate eyesores and minimise damage to heritage and welfare. When one weighs up the advantages and disadvantages of using the proposed land at Corton for development, it is easy to see that this location is totally inappropriate, insensitive, destructive, has no advantages apart from the land mainly being currently owned by SCC, and in short is nothing more than very bad planning for Waveney.

Attached documents
Brian Jones

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 43

Comment I am against this option for the same reason that the council have discounted land in option number 182 where they state that it provides a positive contribution to the more rural feel of this locality on the edge of town. I am not against small development but I feel we have too many out of town shopping areas which is deterring from the commercial attraction of the Lowestoft Town Centre.

Attached documents
Broads Authority Natalie Beal

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 471

Comment 2.74 – I am presuming the images give an idea what a Garden village could involve. Suggest this is stated as it could be confusing to include photos of these locations in the WDC Local Plan.

Attached documents
Corton Parish Council Jane Haverson

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<tr>
<td>Comment ID</td>
<td>785</td>
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| Comment | Corton Parish Council fully understand the need for more housing and are not against the proposed plan for housing etc from Rackhams Corner on the large field along side the A47. Our concerns are as follows:-

This is within the boundaries of Corton but the plan seems to be classing this development as a Lowestoft building project. How much input will Corton Parish Council have?

It speaks of new school and community hall and GP surgery. What about existing school in Corton and pavilion on the playing field which are trying to fund raise to extend this building to be a community hall for use by all.

The works entrance in Corton Long Lane is close to nursery school and Old Lane. This could be a safety issue.

We realise that this draft plan is to cover up to approximately 2036 but feel strongly that we should be advised on all future plans being in our parish boundary. |
David and Angela Rayment

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 933

Comment With regards to the draft local plan WLP2.12 - North Lowestoft Garden Village.

We object to this draft plan on the following points:

• Why North Lowestoft? This development will have Gunton and the large part of the Corton Parish between the development and Lowestoft. Is it to give the impression that it is extra houses for "Lowestoft" as opposed to the huge increase in the number of houses in the parish of Corton. The placing of 1,400 dwellings so close to the present village of Corton would create many problems for the village when you consider that the population of the area would increase by at least 3,000 people - almost three times the size of our present lovely village of 561 dwellings and a population of 1,094.

• The building of 1,400 dwellings - plus a school, shops, businesses, etc. over a period of 10 plus years will make life pretty unbearable in our village with noise, dust pollution, and heavy lorries delivering building materials.

• The woods, which are protected by having fields all around them will have houses right up to one side of the woods, spoiling the village of Corton as it stands, losing open views of the countryside, and destroying lovely walks in open countryside. The Council seems intent on shutting us out on both sides, with high wire fences on Bakers Score viewing point (locked in the winter because we can't be trusted to go where we have gone for many, many years) and houses on the open (at present) western side.

• With the addition of at least 1,400 vehicles (possibly twice that number as most households these days have two cars), trying to get out of the new village onto the A47 - assuming a method of getting on to the A47 can be found - every day will lead to huge traffic problems for people from Corton, Blundeston, and even Oulton, with people using the village's roads as "rat runs" to avoid all the traffic that will come through from the 3rd Crossing. With the new roundabout at the end of Corton Long Lane having had the
effect of allowing Corton drivers an easy way on to the A47 at last, this would rapidly disappear with the onset of the traffic from the "Garden Village".

• Bus Service. We of the opinion that with a major development on the A47 we may lose the present excellent bus service, with buses no longer coming through the present village, but going to the new "Garden Village" on the A47. The bus passes through the village at the moment on its way to Hopton as there are no settlements on the A47 to warrant its use. With the larger "Gardan Village" on the A47, will it still bother to go through "little" Corton.

• There will be extra pressure on all the local amenities: the James Paget hospital, which is already overstretched and struggling to serve the locality; the Ambulance service would also be badly affected; and the pressure on the Police Force (rarely seen since our one and only special on a bike was taken away) will be increased with the extra 3,000+ people living in the locality.

• The land further north up the A47 on the west side of the road by Jay Lane would give a better chance of getting access safely on to the A47!
Darren McIntyre

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 6

Comment Hi this sort of development should be being built first and not 10 years from now build this first and brook marine site in 10 years and give yourself some some time to sort the road network out

thank you

Attached documents
David Butcher

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 90

Comment Having been through the newly published Local Plan (which I will return to again), my initial comments are purely to do with the parish of Corton, where my wife and I have lived since August 1971. Obviously, the proposed Garden Village (2026) will have a major effect demographically and environmentally on the community - though not necessarily to its detriment. If the scheme is carried out with due sensitivity and imagination, it could make a positive contribution to the area.

My immediate reaction is to urge non-pastiche, stereotype-free styles of architecture, thoughtful layout and grouping, and ecologically sound use of open space. In particular, most of the open-area tree-planting should be of native, deciduous hardwoods (not ornamentals) with copse and spinney technique applied. Nearer the houses and other buildings, of course, the question of size and spread of species (including root-growth) has to be considered - and there is then the opportunity to plant smaller, decorative types of tree.

Another factor to be borne in mind is that much of the proposed new development (centring on what is now Taylor’s Farm) will occupy land formerly belonging to the medieval hamlet of Thorpe. This name, I would suggest, ought to be used somewhere in whatever title is chosen to identify the "garden village". It would give it an identity and help to perpetuate a valuable reference to the past.

Attached documents
David Coe

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 415

Comment It is the my and my mothers opinion that we would prefer the Alternative option for housing development rather than that of WLP2.12, which would not only ruin the surrounding countryside and be an absolute eyesore which is unnecessary.

By all means build along the new link round joining Corton Long Lane roundabout to Millennium Way. Do NOT develop the agricultural land going north from Corton Long Road.

Use CPO'S or request landlords / owners of empty properties to make use / upgrade them. The High Street for example, the Crown PH and area behind it. If that is not a good example then what I am saying is to make use of any unused property within town first, rather than developing the countryside.

Also, if we have a need for more Housing, please tell me why the hell are you constructing 'Woods Meadow'!! This area would be ideal for housing and keep within the town boundaries and would make more sense than WLP2.12

Yours faithfully,

David W Coe

Attached documents
Duncan Shreeve and Kerry Breach

Section
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID
250

Comment
I am writing in complete despair at what I was confronted with over the weekend.

I returned home on Friday evening, looking forward to the weekend with my family, when my partner presented me the summary of the Waveney Local Plan, highlighting the fact that our property was located within the proposed "North Lowestoft Garden Village".

We then visited the interactive map to find, to our astonishment, that Taylors Farm was completely "hatched" over as if we didn't exist.

Taylors Farm is privately owned and so I would have expected this area to have been highlighted accordingly, as with the other privately owned properties on the map. We now fear that we are going to lose our house.

Additionally, having recently had our property valued with a view to sell, these plans have now made that more difficult, and possibly reduced the value.

It would have been nice to have had some prior notification instead of discovering this information the way we have.

Attached documents
Ed Davey

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  555

Comment  The size of the village is too large and Corton would lose its identity. It will be 3x the size of the existing village.
Increase in traffic along Long Lane and around Corton.
Loss of natural habitats, areas of natural beauty that we walk around.
Spoiling the view of many residents around Corton.
The impact of building a larger school may mean the closure of Corton Primary as it may seem less financially viable.
Access to the village would be difficult and cause problems around the already busy and fast moving traffic around the roundabout.
Policing larger areas when services are already stretched.
Corton will no longer be seen as a village which may impact on selling our house in the future.
It's too large!
Close to the sewage site.

Attached documents
Environment Agency

Section                                  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID                              863

Comment                                  We would support the promotion of green infrastructure as part of the North Lowestoft Garden Village, although we would like to see the benefits of green infrastructure promoted more strongly. Green infrastructure can play a role in providing assets such as green corridors which link habitats, adapting to climate change adaptation, flood risk management, as well as contributing to human health and well-being.

Attached documents
ER (East Anglia) Ltd -
Ingleton Wood LLP (Sarah Hornbrook)

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 950

Comment North Lowestoft Garden Village

Background

On behalf of ER (East Anglia) Ltd, we strongly support the proposed allocation of the proposed site under Policy WLP2.12 for comprehensive mixed-use development including up to 1,400 new dwellings, a retirement community, primary school, employment development, local shopping centre and green infrastructure. It is, however, requested that minor additions are made to the proposed wording of the Policy, to enable small-scale development on parts of the site, specifically the land fronting onto Blundeston Road, to come forward in advance of the adoption of the Masterplan for the site. Alternatively, the land adjacent to Blundeston Road could be excluded from the allocation and incorporated into a new Settlement Boundary on Blundeston Road.

In terms of the proposed allocation, the site is considered to be entirely deliverable and capable of making a significant contribution towards satisfying the Council’s housing need during the period to 2036 and beyond, as well as providing much-needed employment land which can be cross-subsidised by the housing development, aiding its viability and delivery. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available and viable.

Proposed Amendments to Policy WLP2.12

It is requested that minor alterations are made to the draft Policy, to ensure that the opportunities afforded by the site are maximised.

Whilst the proposed allocation is not expected to start until 2026, there are elements of the site which could be brought forward more quickly, to aid the supply and delivery of housing in the District. Specifically, a modest
quantum of residential development along Blundeston Road could be accommodated in the short-term without detriment to the wider site allocation; this would not prejudice site access as it is proposed that a new access to the Garden Village is created from the A47, and would not prejudice the provision of the community facilities, which are to be located centrally within the wider site. Frontage development along Blundeston Road would complement the existing development in this area, and would not undermine the urban design principles of the Garden Village concept.

It is therefore proposed that the wording of Policy WLP2.12 is amended to allow such development, subject to satisfactory demonstration that it would not prejudice the ability to deliver the wider Garden Village concept.

The proposed revision to Policy WLP2.12 is detailed below, with new text underlined and omissions crossed through:

Land comprising North Lowestoft Garden Village (77.60 hectares) as defined on the Policies Map is allocated for a comprehensive mixed use development including:

* Up to 1,400 new dwellings.

* Retirement community comprising a care home / nursing home and extra care and/or sheltered dwellings.

* 2 form entry primary school.

* Playing field and green infrastructure.

* A local shopping centre comprising a convenience store, cafes and other local services.

* 5 hectares of employment development (falling under use classes B1, B2 and B8).

A masterplan should be prepared and adopted as either a Supplementary Planning Document or as part of a Neighbourhood Plan. No development will be permitted on this site until the masterplan has been prepared. Small-scale development along existing road frontages, such as Blundeston Road, will be permitted in advance of the adoption of the Masterplan, provided that it can be satisfactorily demonstrated that it would not prejudice the ability to deliver the wider Garden Village concept.

The masterplan should:

* Set out detailed arrangements for access on to the site, including
identifying a new access from the A47, associated mitigation and safe access across the A47 for children attending the new primary school.

* Set out the distribution of land-uses across the site. The primary school, local shopping centre and retirement community should be located centrally on the site close to the new access from the A47.

* Set out the approach to phasing of development across the site.

* Set out detailed urban design guidance and demonstrate how the principles of garden city developments can be met on the site.

Housing development on the site should help cross-subsidise the delivery of the employment land.

Alternatively, the land fronting Blundeston Road could be excluded from the site covered by the Garden Village allocation, and incorporated into a new Settlement Boundary in this location. This would enable development in this location to come forward in advance of the wider site. Small-scale frontage development in this area can, and should, be delivered in advance of the wider Masterplan.

Summary

The site’s allocation for comprehensive mixed-use development is considered to be entirely appropriate, and would represent sustainable development. The proposed allocation under Policy WLP2.12 is, therefore, supported but revisions to the Policy are sought to enable quick delivery of a modest quantum of development along Blundeston Road, subject to satisfactorily demonstrating that it would not prejudice the delivery of the wider Garden Village concept. This would enable the site to contribute towards the District’s housing supply at an earlier stage in the Plan period than currently anticipated. This can be achieved either through a revision to the wording of Policy WLP2.12, or omission of the land adjacent to Blundeston Road from the Garden Village allocation, and creation of a new Settlement Boundary in this location.
George Redpath

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 9

Comment Has Lowestoft Rugby Club at Gunton Park, been considered for residential development? I understand the rugby club are looking to sell their land and move to a more suitable location? Gunton Park would seem to be a natural extension of the Woodlands?

Alternatively Gunton Park would lend itself well as a sports facility similar to WLP2.18 at Oakes Farm, thus supplying a multi use sports facility at the North end of Lowestoft? I cannot see Waveney leisure centre at Water Lane supplying the sporting facilities required.

I note that a playing field is suggested in this development, which I suggest is not sufficient?

Attached documents
Gill Armstrong

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 569

Comment Corton is a rural village so why was it not mentioned in the strategy for rural areas? Why was Corton absorbed into Lowestoft? Is it because Lowestoft with Carlton Colville, Oulton and Oulton Broad is expected to accommodate the majority of the district's development but Corton would be supplying more than 50% of this? Would mean changing the boundaries again?

Corton would be surrounded by the new village and all the holiday camps, thereby losing its village atmosphere and surrounding green landscape

Why build on grade 2 agricultural land when there are brown sites available elsewhere?

Why build a village spanning a busy trunk road? This is the main access into Lowestoft, from the north which will be made into a residential area with eventually another one or two access roads from the A47

The access on Corton Long Lane is totally impractical for construction traffic, let alone the increase in other traffic to the site. There are already major problems with access and speed along this road, there are many complaints about this and CSW frequently log drivers over the speed limit. A kindergarten, which is almost opposite the proposed entrance, causes holdups, several times a day, as the parents park all along the road when picking up and dropping off children. Adding a major access from here would cause havoc. Access from Blundeston Road is also impractical, as this too is a narrow country road

Construction traffic will lower the tone of the area, creating noise, pollution and inconvenience for the people already living along this stretch of country road and will significantly lower their quality of life and devalue their properties.

The plan mentions utilities, does this mean that the present water treatment plant will be expanded? Waveney is in a water stressed area, the
water pressure in Corton is already low, adding more properties and businesses would add to the problem

If affordable housing is to be built, how will this remain affordable? Unfortunately very often once an affordable house is sold it is marketed to make a profit, then it is no longer affordable. Some sort of policy needs to be in place to keep these houses at a reasonable price so that they continue to provide first time buyers with access to affordable homes

More hard standing means more surface water, which could impact on coastal erosion

Building a new school could potentially jeopardise the current village school

Attached documents
Gillian Maryon

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 393

Comment On looking at the proposed preferred option for Lowestoft my immediate feeling is that you are creating a large new village with a distinct 'green gap' between it and the town. The dual carriageway seems to be an odd thing to have running through a large housing development and it doesn’t connect to existing housing and infrastructure. I would have thought that each village and community already existing would be better served by sympathetic 'additions' to their locality with extra thought to the added needs of the existing residents i.e. drainage lighting and services like schooling and community facilities being upgraded for them as well as the newcomers. The whole new idea of a garden village is in the parish of Corton ... not as such Lowestoft ... however the alternative options outlined in pink do to my mind seem 'attached' to existing suburbs of Lowestoft Oulton Corton Blundeston Carlton Colville and Pakefield which would be spreading the extra housing more around the town and already on bus routes easily accessible from less busy roads.

I fully understand that housing is necessary and we all want to be able to enjoy our surroundings in this part of our country but massing a new development mainly in one place 'apart' from the existing town in open countryside feels wrong when there is space in the 'suburbs' at the moment and a good deal of brownfield land could also be utilised for extra 'town' accommodation.

My feeling is that we have always been 'nearer to Norwich' than Ipswich and as such could well end up an extension along the coast to Gt. Yarmouth which would mean eventually all the gaps will get 'filled in' and I for one would not like to see that day .. we do enjoy some open landscape between towns at the moment and the Norfolk border is not that far away when in fact there is a lot of land south of the town deeper in Suffolk. Lowestoft south could be the tip of the Suffolk iceberg as far as Londoners are concerned for their away days and week-ends as places like Southwold and Aldeburgh get to saturation point. The A12 has in my mind been designated
'developed' up to Ipswich and may well fail to get a lot of thought and attention from now on as the A47 becomes the route to the midlands from our neck of the woods. Industry needs the link north... housing could be in many parts of north Suffolk to help with the supply of labour skills necessary to help this part of the world survive apart from Tourism... Gt. Yarmouth and Lowestoft can be fed from developing 'inland' locations like Beccles Bungay Hales Loddon and perhaps places Stalham and Caister which makes me feel that perhaps the two town councils should have a strategy between them of how to see the East of England develop for the good of all.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 955

Comment The Plan includes a number of proposals for large scale strategic allocations that account for much of the Plan’s housing requirements including Policy WLP 2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood; Policy WLP 2.12 – North Lowestoft Garden Village; Policy WLP2.15 – Land South of The Street, Carlton Colville/Gisleham; and, Policy WLP 3.1 – Beccles and Worlingham Garden Neighbourhood. Whilst the identification of strategic allocations is an approach that can be 'made sustainable' through the timely provision of associated infrastructure, it is essential that local plans take into account the risks associated with the delivery of any such schemes and the knock on effect that this can have in terms of housing delivery. It is also noted that the Plan is not currently accompanied by a viability study and it is vital that this evidence is produced alongside robust assumptions regarding infrastructure delivery and its impact on the likely rates of delivery from strategic sites.

As indicated in response to Policy WLP1.1, it is essential that the Council’s suite of housing land allocations can demonstrably deliver the local plan requirement over the plan period whilst maintaining a five year housing land supply.

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1166

Comment The Borough Council notes in particular the strategic allocation at North Lowestoft Garden Village in the parish of Corton (site policy ref. WLP2.12). The Borough Council is pleased to see that extent of the allocation maintains a sizeable gap between this and the settlement of Hopton-on-Sea (within Great Yarmouth Borough), and this is reinforced by draft policy WLP8.34 - Coalescence of Settlements. Note that the Borough Council is currently considering potential growth options for development in Hopton-on-Sea, including housing growth to the south of the current settlement. The Borough Council has no objection to the Corton draft allocation, but suggests that paragraph 8.193, listing important gaps, is amended to note that Hopton-on-Sea is located within the Borough of Great Yarmouth.

Waveney District Council will be aware of the strategic importance of the A47, the improvements planned by Highways England, and the further upgrades promoted by the A47 Alliance. It is important that the proposed development does not undermine that strategic importance and those improvements. The Borough Council would therefore be pleased to see this aspect explicitly addressed in the allocation policy, ensuring that any works complement wider A47 improvement schemes and investment.

Attached documents
Gwen Maher

Section                  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID              843

Comment                  I am against the proposal of the Garden village housing in your strategy for Corton.

i brought my house so I was on the outskirts of Lowestoft with views of fields with no built up areas.

i enjoy the wildlife including Deer in my garden, this would have a huge affect on our peaceful village. im afraid Lowestoft can not offer job prospects for the proposed number of new homes as well as traffic congestion in our town, it is beyond belief that we are even considering new homes in our overpopulated, crime ridden, congested traffic conditions.

Gwen Maher

Attached documents
Highways England David Abbott

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1526

Comment The supporting text for this policy makes reference to the need to create a new junction with the A47 trunk road for the purpose of accessing this site. It also refers to changing the character of this section of A47 to be more urban in nature. In practice, while the A47 remains rural and high speed in character there would be a strong presumption against creating any additional junctions.

We do not rule out redefining the character of this section to be more integrated with that of the urban sections through Lowestoft but the Plan needs to make clear this will need to be undertaken with careful planning and suitable package of measures to achieve it. Ultimately, our primary concern is to ensure the A47 at the very least suffers no degradation in safety, preferably to see improvements where possible, across all user groups. There are particular challenges in relation to how the A47 splits this site.

Beyond this it needs to be made clear that the impact of this site on the operation of the A47’s roundabout junctions with Gorleston Road and with Corton Long Lane/Millennium Way will need to be maintained at acceptable levels.

Attached documents
Isaac Francis

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 518

Comment I always assumed the basic layout of things around the house were fairly logically set in stone.

Taylor’s farm is set amidst fields of produce, but is right next to a dual carriageway which is part of the A47. Access is directly on and off the A47. However, the close proximity of the A47 does not give us much sound or air pollution as we are separated from it by a very large and well established hedgerow, as is often the case with dual carriageways and A-roads.

This 'Garden Village' plan would clearly change this completely. Replacing fields and hedgerow with housing would not only be of detriment to residents of Taylors Farm and other nearby country homes who would see their property values plummet, but I believe it would be of detriment to the town and surrounding area as a whole. The 'Garden Village' plan is fundamentally flawed.

The flaw is that it makes no sense to build a completely new village on top of a major trunk road- in our case, the A47.

A new village can be built at a distance of some hundred yards from such a road- like so, the perilous nature of having a busy road going through a built up area is avoided. Furthermore, one side of the village is not arbitrarily divided against the other, and noise and air pollution are not concentrated where people live!

Where housing must be put alongside a main road, it is best to do this as an extension of an already established town, in our instance, Lowestoft.

To try and put the housing a mile out of town, as 'WLP2.12' would be, is dangerous because drivers would have already sped up since leaving the main town, and would be much less receptive to going back down to town speeds for a short stretch, then up to trunk road speeds once more.

Don’t try and tell me you will enforce 30 and 40mph limits all the way from
the top of Millennium way to the end of the hypothetical WLP2.12. If there are parts of road that aren’t built up, drivers will go faster on them. It’s an inevitable human reaction that will never wear out with any amount of policing and enforcement. Road accidents are saved when the roads and towns are simply designed a little more logically, so that the trunk road follows the built-up street and the two are not mixed.

So I would encourage you to build, but do it on sites located centrally and away from trunk roads. I have been commuting to Norwich for work for 4 years now, and I have experience and understanding of the way both good and bad drivers act in different road situations. I know that no amount of effort trying to make the hypothetical WLP2.12 safe will ever stop the inevitable, tragic accidents occurring from building housing and primary schools alongside a dual-carriageway trunk road.

I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

For Lowestoft itself, I would again suggest trying to keep everything central—WLP2.4 is a good place to build (near to the lake but I think this is a lot less danger to children than being near to a trunk road) and so are most of the Preferred and Alternative sites in the north.

Attached documents
J Clutten

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 916

Comment North Lowestoft Garden Village

Living in Corton Long Lane much of my reading has been focus on the land that is proposed for the North Lowestoft Garden Village

The Secretary of State for Environment, Food and Rural Affairs, Michael Gove has said that farmers should be encouraged to protect the natural environment, so why then does the Suffolk County Council, the owners of this farming land feel they should fly in the face of this and promote this development?

Strategic Gaps and Open Breaks

To maintain the identity of settlements and to avoid the coalescence or merging of nearby settlements, the existing Local Plan defines 'Strategic Gaps' between Lowestoft and Kessingland, Lowestoft and Hopton (in the Great Yarmouth Borough) and Halesworth and Holton. The 'Strategic Gap' policy restricts development where it would undermine these objectives and reduces the open character between settlements.

The existing Local Plan also identifies three areas designated as 'Open Breaks' which aim to maintain the open, undeveloped character of part of the settlement which helps preserve the townscape. The 'Open Breaks' are at Lowestoft Road, Carlton Colville, Dip Farm, Gunton and Ollands Plantation and Meadows, Bungay.


If this is to go ahead, there are a number issues, firstly it would seem that this is to be developed as a 'village', however the document also says that gaps will be retained between villages, this site provides no gap and straddles a main road, it is simply an extension of Lowestoft so will not have a village feel as suggested. Access onto and across the A47, including safe
pedestrian routes for the proposed primary school will be required. It is also noted that access to the proposed development will also be from Corton Long Lane. We have lived in the area since 1976, living in Gunton Avenue and then Corton Long Lane so we are well able to judge the increase in traffic.

Corton Long Lane has pavement on one side only and is narrow. The building of houses on the Rugby Club will also add to traffic. There is an issue with speeding traffic, despite the speed limit and at certain times of the day, <nursery pick up times>, considerable traffic congestion. On discussing this with Sam Hubbard, he suggested that the road access proposed would probably be between 21 and 31 Corton Long Lane, ie opposite the nursery, this would in my opinion, be a dangerous option. As I failed to find any details of your consultation with Suffolk County Council on this issue I contacted them. They confirmed that they had been contacted.

"I can confirm that Suffolk County Council staff have met with Waveney District Council to discuss the local plan and this site. However discussions have only been at a high level, and whether this would be an appropriate site for housing. Part of the discussion has been around access, including the potential for early stages to be accessed off Corton Long Lane. Suffolk County Council have made it clear that this would not be a suitable long term access for the full development.

As this is an early stage, we have not yet made any assessment of how much development could happen from this access before an further access direct from the A47 is required, nor whether Corton Long Lane would remain a primary access or become, for example, a bus gate. We would also anticipate that further mitigation would be required to Corton Long Lane, but again, no assessment has yet been made what that would be."

This implies that some construction traffic would be permitted, personally I feel that should this project go ahead, the A47 access should be available from the very start. I would ask the council to consider what the traffic levels will be in 10 years time, however optimistic we would like to be about use of alternative transport methods, this can only get worse. Using Corton Long Lane for construction traffic is not practical, and if a through road, it will become a dangerous 'rat run'.

While the document does mention providing facilities on this site, it does not seem to point the reader to any assessment on the need for increased provision at the JPH, this hospital cannot cope with the current population's requirements, so one has to question if it is sensible to encourage an
increase in the local population. While a primary school is proposed, there would need to be additional places in the secondary sector. Access to Doctors' Surgeries and Dentists also needs consideration.

Attached documents
Jayne Lisantri

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 107

Comment North Lowestoft Garden Village

Concerns

1. ENTRANCES TO THE PROPOSED HOUSING DEVELOPMENT

As a resident of Corton (The Street) for the past 11 years and a frequent driver along Corton Long Lane, I witness regularly the traffic problems which mainly arise between the hours of 8:30 – 9 and mid afternoon Monday to Friday.

The problems mainly arise from the parking of cars outside the Kindergarten (a long established business), which is situated approximately opposite the proposed entrance to the new development, when parent/guardians are dropping off their children.

The road is extremely busy at this time due to it being the main road into the village from the A47, primary school children are being driven to school at this time from outside of the area, to The Street, where the school is based, or cycling or walking along Corton Long Lane to get to school. This is the main route out of the village for current residents accessing the A47 to get to Lowestoft or Great Yarmouth for work. Any increase in additional traffic is going to cause a major risk of accident/injury not only to children, but cyclists and motorists. Surely the most sensible and accessible routes of access/exits would be slip roads off the main A47.

2. DRAINAGE

Corton has a well established drainage problem. Coastal erosion meetings state that the cliff problems are due to bad drainage. Private funding has provided to date a successful temporary solution by netting and piling the cliffs in the area alongside Warners holiday camp. My concerns are with the additional proposed housing developments drainage needs, how is this going to affect the cliffs. I live on The Street, with only Warners as a sea
defence! Will the new development take into account this severe problem, and put in place measures to prevent collapse of the cliffs, and also provide an adequate solution for all the home owners this is likely to effect. Surely also with the removal of large trees, which are currently situated on the wetland and the proposed new development land, these trees absorb a lot of the water. Removal of the trees is going to be cause an even bigger problem.

3. CRIME RATE INCREASE

I moved to Corton as I wanted to live in a quiet old fashioned village, with the majority of residents being elderly and retired. I had previously lived in south Lowestoft. I chose Corton for its original kept character and for its location, having woods beach and countryside on my door step. Whilst I appreciate the need for new housing, I disapprove that part of Corton's beauty is going to be destroyed by a new development, and it's identity as a village will be lost.

As with any new developments there are always pitfalls with an impact to the surrounding immediate areas. I believe that Corton with it current low crime rate will be no longer in that privileged position, and with the increase in population unfortunately will bring with it an increase in crime, with mostly the vulnerable elderly being targeted.

Attached documents
Joan Pinter

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 654

Comment The proposed development of North Lowestoft Garden Village is on agricultural land. It seems to me to be completely wrong to permit development on agricultural land (whatever its grade) until all brownfield sites have been developed. We need to rely less on food imports and should be trying to grow our own, rather than building on agricultural land.

Calling the development "North Lowestoft Garden Village" draws attention away from the fact that this is rural development within the village of Corton, and should be considered alongside other rural development proposals.

Trying to create a community with a trunk road running through the middle seems to be creating safety problems.

With the closure recently of the Oulton Medical centre, G.P. facilities north of the river are at breaking point - so proposing such a huge development will almost guarantee an inferior medical (and probably dental) service for existing and the new residents. Without the proper infrastructure in place it is folly to propose such large developments.

The initial proposed access and exit to this site onto Corton Long Lane, just west of Old Lane is going to give huge traffic problems. Parents parking to drop off children at the existing kindergarten here already causes real traffic problems, and making an access near there for such a huge number of extra dwellings would most likely cause huge problems and also become an accident black spot. Although there is a speed limit of 30 m.p.h. along this road, in practice cars race along here.

Building more and more houses is only going to encourage more retirement development to this area with the resulting pressures on the present infrastructure. More action should be being taken to create new jobs, limit second homes, and get unoccupied homes fully occupied before allowing endless new houses new houses to be built.
Attached documents
Kerry Breach

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1076

Comment I am writing to raise my concerns on the proposal to develop the area of land within the parish of Corton (WLP2.12 North Lowestoft Garden Village).

We purchased Chestnut Barn on Taylors Farm approximately 9 years ago. One of the main reasons for choosing to live here was the fact we were surrounded by farmland, and the wildlife that goes with it.

In section 2.69 of the draft plan you state "this area of land will likely have the most limited impact on the landscape". For us this will have a major impact on the landscape around us, as well as devaluing our property.

Obviously our main concern is the area to the west of the A47 where our property is located. Taylors Farm occupies a large section of this land and we fear any new development will undermine the character and amenity of the farm, which dates back to the early 1800's.

We feel that an alternative site should be looked at in more detail, one that would have less impact on current residents and wildlife, be located further away from the sewage plant and be on a road where there are already pathways and a suitable speed limit for access to the proposed primary school and care home etc.

Thank you for taking the time to read this email, we look forward to hearing further details in due course.

Attached documents
Louis Smith

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 541

Comment It is dishonest to call North Lowestoft Garden Village a part of Lowestoft, or even an extension of Lowestoft. It does not have a boundary which touches the existing built-up area of Lowestoft. It does adjoin Corton Long Lane, and the land is in Corton Parish. Allocating this land for development is allowing building on a green site in a rural area. These houses should be counted as part of the allocation to rural areas, not part of Lowestoft town.

If we need more houses in Lowestoft we should be building upwards, not spreading over green fields.

Attached documents
Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  542

Comment  This proposed new settlement will be cut in half by the A47 dual carriageway. Safe ways to cross the trunk road will be needed for cyclists and pedestrians. Bridges or tunnels will be needed.
Lyn Want

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  82

Comment  Would you kindly indicate to me whose “preferred site for development” WLP2.12 can possibly be? Environmentally, it would be calamitous, and this is every bit as distressing as the disastrous effect this huge development would have on Corton village, whose very existence into the 21st century depends on support through managed growth. Only the alternative options, including site 114, offer hope for the residents of Corton on either score.

Attached documents
M J Edwards & Partners Chris Edwards

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  631

Comment  Dear Sirs,

I am writing on behalf of M J Edwards & Partners regarding the proposed site WLP2.12 into the future local plan and wish to challenge various issues.

Overall location

Whilst acting as a "one stop shop" in grouping all of WDC's future housing needs in the Lowestoft region we believe a proposed site of this scale will only serve to exaggerate the poor flow of traffic inside the Lothingland island. It is our opinion the housing allocation could just as easily be achieved by other options in the Waveney area which have now been discarded. It would also be a major intrusion into the green belt between Suffolk and Norfolk, Corton and Hopton.

Farm Land and Leisure

The proposed site would be removing 77.60 hectares (191.74 acres) of grade 2 arable land this will also have a devastating effect on the existing business's and families which farm the land. It will have an impact on other business's which derive incomes from those farms such as agronomy companies, fertiliser firms, machinery business's, casual and employed labour. These will also be a loss of the equestrian business in Corton Long Lane which not only facilitates leisure pursuits to 100 and more people every year but old also affect other business's which service this business.

The future according to WDC

By creating a whole new settlement "Garden Village" this should introduce 1400 new homes along with old peoples homes, schools, shops, doctors surgery and business park. It is our opinion the current road system of the A47, Stirrups Lane and Corton Long Lane is inadequate to service a development of this scale therefor any new development would be subject to a major investment into new roads and roundabout systems this would
be hard to justify offset against other now rejected locations even if they appear fragments in terms of aesthetics or other reasons around the Lowestoft region.

WDC hope the new Garden Village will facilitate the housing needs for a new rise in the local economy. It places emphasis in the local plan on new industries such as the renewable energy industry and tourism. It also acknowledges past industries such as fishing, manufacturing and farming, how only 53% of the existing population that are working derive income from the town leaving 46% driving to other towns or cities every day.

This is appears well in document however one critical factor has not been identified anywhere with in the plan and that is the duelling of the A12 from Ipswich and the A47 from Norwich. We asked a WDC representative when this was to happen he could not give an answer.

Insufficient infrastructure

The existing single carriage way roads will never attract industry and business into back into the area. It was the late 1970’s and early 1980’s when manufacturing, building and transport companies left Lowestoft and Gt Yarmouth claiming inadequate ports and infrastructure forcing them to relocate further inland, this with out doubt has contributed to the large rate of unemployment in the town and surrounding area and will continue to hold back enterprise.

Conclusion

Without adequate infrastructure there will be no rise in any industry in the future, the town will be left with a new 3rd crossing which will ease the traffic flow to a degree, have more deprivation due to not enough enterprise to support the local economy and enough social housing to support the generations of people who can’t find work other than for 8 weeks of the year with in tourism.

Therefor we object to site WLP2.12 being considered and ask the council to reconsider choosing to place more priority on:

- Improving the infrastructure to and from the town
- This will eventually bring more business and industry to the area
- Lastly housing development once the area can support itself
Attached documents
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 930

Comment WLP2.12 North Lowestoft Garden Village We object to the proposed allocation of land north of Lowestoft for residential development, employment development, primary school and local shops. The Council acknowledges at para. 2.70 that access is a constraint. Furthermore, the requirement for a masterplan as part of a neighborhood plan process, while necessary, will further delay the delivery of housing.

Attached documents
Mark Allard

Section          Policy WLP2.12 - North Lowestoft Garden Village

Comment ID        834

Comment          I live at corton long lane. I bought this property because I didn’t want to live on housing estate, I wanted the quietness of the country side over looking fields and a wood with no one over looking my property, I’ve spent a lot of money extending my property with big windows on my gable end so I could over look surrounding fields and wood, my main bedroom over looks the fields my main living room and my kitchen over look the fields with your proposals I’ve got to look at housing estate. We get so much wildlife visit are gardens from the surrounding fields and woods, tawny owls often visit my garden, barn owls hunt over paddocks watch them from my kitchen window, bats flying round the garden in the evening. why do you want to spoil such a wonderful part local countryside. I cannot see why you cannot use your smaller alternative options that you have shown so you do not have a large devastating affect on a large wonderful part of the countryside. Where you can have better access to your road systems from several different areas so you are not making such large impact in one area of the countryside, so that traffic is not congested in one area, also one of access to this estate is from corton long lane one of main rds in out of corton, I have a lot of problems getting out of my driveway because of increased traffic in the last ten years because there is no foot path on my side of road, the other side of the road the footpath is only wide enough for one person to walk a long. Be sensible and seriously consider what impact your going to make on such wonderful part of the countryside yours sincerely M Allard
Michael Soanes

Section  
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  
1188

Comment  
I am against the proposed development to the west of Corton for the following reasons:

1. The size of the proposed development will swamp the existing village and gradually sap its vitality.

2. The new development will never integrate into the existing community because of its greater size and detached location, and the old village will turn into a satellite and 'poor relation' of the new one.

3. The development will destroy forever the site of the medieval (probably Domesday) hamlet and church of Thorpe and will deprive Corton residents of the rural walks they now enjoy.

4. It is too near the sewage works.

5. Whatever benefits it would bring to Corton, Corton would be best without. There have been many changes to the village over the last fifty years, and they have all been for the worse.

Attached documents
Michelle Kears

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 82

Comment North Lowestoft Garden Village

As a resident of Corton who moved with my family out of North London to semi rural Suffolk over ten years ago, I am concerned that the North Lowestoft Garden village outline plan as it stands would detrimentally change the character of the area which is the very reason many of the local residents have chosen to live here. Indeed that is the plan's purpose, to extend the urban area of Lowestoft out towards Gorleston. My specific concerns and comments are as follows:

* There is much derelict ex-industrial land within Lowestoft (north and south) already. Can the Council give reassurance that any further creation of employment land outside Lowestoft town itself would not happen until all 'brownfield' sites have been successfully and sustainably been regenerated and utilised?

* I think the creation of more sheltered housing and dementia friendly design principles is a very good and pragmatic one. Extending small dwelling developments specifically for the elderly such as one already in existence with Corton (and recently extended slightly) is to be welcomed.

* Loss of green belt land has an impact on the environment (even simply being able to soak away rain water), possibly extending existing coastal erosion depending on drainage design; wildlife and people's well being. As mentioned many local residents have moved to Corton and Blundeston because of its rurality albeit with close proximity to amenities. The water treatment works does not actually detract from the enjoyment of scenery and nature in this area.

* Whilst creation of schools is mentioned in the draft plan there is no inclusion I think of provision of primary care facilities/GP surgeries. Having been a local practice manager for the last nine years I am well aware of how the nearest GP surgeries currently in existence to the North Lowestoft
Garden Village area are already under extreme pressure due to shortage of GPs; the situation may improve by 2026 and beyond but I think this need and indeed risk has to be taken into consideration.

Attached documents
Mr & Mrs Gil Sawyer

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  327

Comment  We live in Blundeston Road, Corton

1. We are concerned at possible access roads onto Blundeston Road. This is only a narrow road which has a 30mph speed limit which is constantly exceeded by motorists and motorcyclists. Perhaps the police should implement speed checks to deter this speeding.

2. We are concerned at the number of proposed properties and associated volume of traffic in what is already a very busy part of the road system. Any further development will have an adverse effect on existing properties in what is at present a semi rural environment.

3. We are concerned at the amount of building traffic and the resultant noise, mess and inconvenience to local residents.

4. We are concerned at the over-development of this semi-rural area and the resultant adverse effect on wildlife and trees, shrubs and natural flora.

5. Adverse effect on local property values, in particular our bungalow which is in very close proximity to the proposed development. Our driveway is opposite the field entrance.

Attached documents
Mr & Mrs T Lawrence

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 648

Comment Following the receipt of the summary of the Waveney First Draft Local Plan and attending the exhibition at the Lowestoft Library we would like to make the following views. We would like the comments below to be taken into consideration on your future decision with this policy as we do not agree with the North Lowestoft Garden Village being one of the preferred sites.

Policy: WLP2.12 Location: North Lowestoft Garden Village

* The proposed use is to build up to 1400 new homes on the site which will be only a few yards away from the village of Corton. It is considered that with the rural village of Corton having only 561 dwellings it would not remain a village given the close proximity of this new site. As detailed in the local plan we agree that further development on the edge of Corton will increase the risk of coalescence and undermine the separate identities of Corton and the new development on the west. Villages need to be retained as villages which this policy does not support.

* The proposed site will be on a greenfield site which is at present agricultural land. At present it is occupied by all kinds of wild birds, animals and other creatures. Some of the species occupy or regularly visit the site are buzzards, owls, skylarks, chiff chaffs, deer, pheasant, fox, various species of bees butterfly, dragonfly and mayfly too. Various mushrooms and toadstools are also found on the site. The proposed construction and removal of trees and hedgerows would endanger the habitat for these creatures and obliterate if not drastically reduce the wildlife corridor through to the adjacent fields and woodland areas.

* The existing primary school in Corton will be close to capacity within the next 5 years and the surrounding buildings give no scope to expand. The school already use the village hall for the children's lunch, which requires a supervised walk to and from the two premises each day in all kinds of weather. Therefore any additional development will exceed the capacity of
the school.

Corton has no GP surgery or post office. There is no provision within the development either. The nearest are in Hopton which would not have the facilities to cope with the additional occupants of 1400 homes. Crime is on the increase. We consider that policing an area nearly three times the size of Corton and albeit a denser populated area, will cause an increase in crime. Does this or will this form part of the local plan to allay any concerns for existing residents.

Attached documents
Bradley

Section  
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  
1533

Comment  
The above plan will add 300% to the Corton area housing. This will destroy the ambience of the village which seems of no consequence to the planners.

Farm land will be destroyed and the varied wildlife, king fishers, newts, owls, cuckoos, deer, foxes, birds of prey, bats and many more. There is the medieval village of Thorp, with church and ponds on this site.

Also I believe that site WLP2.12 was turned down, 6yrs or so ago as a golf course as it would be detrimental to the wildlife and environment.

Mr Bradley is signing this in agreement [Letter written by B Glenn]

Attached documents
Norman Castleton

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 265

Comment Ruination of a nice friendly landscape. A charter for speculative builders and we all know that this will not turn as per the garden suburb dream. Developments on this scale are not sustainable or desirable in the an area known by locals and holiday visitors for its access to natural landscapes. The services in all forms are already overstretched and the plan also includes more unsustainable road building. Building new roads do not ease traffic problems or create wealth or jobs. This is the mantra always used to justify hard coring over green field sites but they always prove to be untrue.

Attached documents
Oulton Parish Council Lynne Ward

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1074

Comment North Lowestoft Garden Village

Although not in our Parish it will affect us, Oulton Street is a very narrow road, it runs through the Village, the paths cannot accommodate a Mother, Pushchair and another child by her side, as well as a wheel chair user are at considerable risk of being sucked in or run over by HGVs, lorries, vans or cars, we have constantly argued for a solution to this problem, we did have a proposal OPTION 9 put forward by a County Councillor to narrow the road at the crossing to make one way a priority, which we saw as a way of stopping overtaking, speeding and to get a restriction of HGVs, but to no avail as the county councillor lost his seat and it appears Option 9 has disappeared. So with the new Garden Village appearing at WLP 2.12 the Oulton Street road will become even busier with people traveling to work and visiting the New Garden Village Houses and Industrial Estate.
Peter Eyres

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1029

Comment

The key to the success of the garden cities was that they were designed to capture the increment in land value, rather than allowing it all to go to the lucky landowner: however, this important point is not mentioned in your document. The TCPA's first three principles, part of "an indivisible and interlocking framework", are:

* Land value capture for the benefit of the community;

* Strong vision, leadership and community engagement; and

* Community ownership of land and long-term stewardship of assets.

As stated in another TCPA publication, "Land value increase is the only truly new financial resource created by and available to the growth process." Failing to capture it for the benefit of the new community will be a betrayal of garden city principles, meaning again that "garden village" is merely a euphemism for another development in the countryside, another buzzword. This is absolutely vital. The suggestion that "housing development on the site should help cross-subsidise the delivery of the employment land" completely misses the point.

Sustrans www.sustrans.co.uk owns the track of the old railway line from Corton northwards and has a long-term ambition to link National Cycle Network route 517 on Corton Long Lane to the old trackbed so as to provide a more direct route as well as to avoid the more hazardous corners on the B1385 Coast Road: many cyclists express reluctance to cycle along this road because of the perceived dangers. The development of this site creates the opportunity to provide this link, so it is very important that a high-quality segregated cycle route is provided towards the eastern boundary of the site, perhaps also with funds committed to the construction of the route to and on the railway line.

The introduction of another roundabout on the A47 would be regrettable: there is a roundabout at each end, which could surely be adapted to serve
the new development, perhaps each one serving one half. Instead, a pedestrian/cycle bridge (perhaps available as a bus-only link too) should be built over the A47 at the middle of the site, with bus stops and facilities, especially the school, near one end of it.

Walking and cycling should be seen as the main method of travel within the site, but are not mentioned at all in the policy.

Attached documents
Peter Philip Francis

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1112

Comment I write regarding the above proposition.

While it seems a no-brainer for the council to use land it already owns, I feel that a development of fourteen hundred houses (larger than Corton itself) surrounding Taylors Farm seems excessive. Why not build nearer to the town, rather than on prime farming land?

Also, I am concerned as to the main A47 going right through the centre of the new village, it is likened by the council to the road outside James Paget hospital- which is well known to be very dangerous: who would knowingly put a school one side, and housing the other, of such a busy road? Besides this, it will make a bottleneck before drivers even reach the town.

The area currently supports species of wildlife which are not seen in a town; we have sighted otter, fallow deer, buzzard, sparrow hawk, cuckoo, barn owl, tawny owl, woodpecker, as well as dozens of small birds and more common animals.

The sewerage treatment works was purposely sited in Stirrups Lane so it was away from housing-now you aim to build right up to it saying screening will be in place. I doubt this will affect the smell which is prevalent sometimes.

Attached documents
Rachel Knight

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 840

Comment This plan should not have any effect on the A47 and the links it provides. We are constantly having speed restrictions imposed all over the county and with no effort being made to bypass areas of housing or convert roads to dual carriageway this means that our county is grinding to a halt. Until this stops we must stop huge developments such as this. This area is also beautiful and a haven for wildlife and some is productive arable land that we need to keep free for growing food and so we should not build houses on it. The traffic in Lowestoft is already crazy and this would add to the over-crowded roads and make matters worse. There is high unemployment and depravation in Lowestoft and these houses will be OK for homes but people who live in them need jobs too. Where will they come from? So many businesses leave the area as they cannot get products out so this is another reason why we need road links 1st.

Attached documents
Hello,

Having reviewed the plan I feel that it is not really a well thought out position for such a large development. My main concern is the impact it will have to the already limited access to Lowestoft. Both the A47(Yarmouth Road) and Gholston Road are main access roads into Lowestoft. As we all know, we hope to have a third river crossing, that will eventually join up Tom Crisp way with Millennium Way, and then the recently completed road that joins Millennium Way to the A47. This will mean for the first time that there is clear, good access through Lowestoft.

Building a 'Garden Village' surrounding the main access route for any traffic travelling north to south will effectively mean the expenditure on the new road network and bridge is a waste. You can imagine what impact this will have - it is a main road - a dual carriageway. Introducing exits to housing areas and pedestrian crossings is going to have a serious negative effect, not to mention the potential danger and fatalities. This is one of only 2 decent access routes to a growing town.

Look at the Bloodmoor/Tom Crisp roundabout junction. We have all these new roads leading to a point that is surrounded with pedestrian crossings. Result? Continual traffic build up on a main access route that is now resulting in traffic taking the London Road South route (which if I understand, the whole point of the new road network was to divert traffic from London Road south and channel it away from the town centre).

There has also been at least 5 fatalities on the new Tom Crisp road in as many years.

It is also strange that such a large development is being built in an area that is naturally very attractive. There are plenty areas much closer to the town that are underdeveloped or in dire need of re-development. Or even towards Corton.
I am just surprised that a development of this nature is planned in this location!

Food for thought.

Thanks

Ricky.

Attached documents
Simon Phillips

Section | Policy WLP2.12 - North Lowestoft Garden Village

Comment ID | 1050

Comment | I support WLP2.12

Attached documents
Smith

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  31

Comment  The plan has concerns about the access to this site, stating there may be a need to amend the A47 flow. Surely it would be appropriate to upgrade the waterworks road for the eastern section of the Garden Village, and provide an access for the western section from the old Yarmouth road, even if this requires an upgrade to the stretch of road between the Blundeston mini-roundabout and the main A47 roundabout.

Other than that, the plan seems eminently sensible providing the density remains in keeping with the semi-rural area.

Attached documents
Stewart and Anne

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 736

Comment THE ENVIRONMENT

In your "Vision in summary" (page 3 of your plan) your first priority is to "improve the quality of life". Your proposal to build on this site does not "improve" the quality of life, it diminishes it by destroying the fields, ditches and hedgerows, replacing them with buildings and roads.

You also state you want to "protect and enhance the environment" how does your plan for WLP2.12 protect the environment? It doesn't, it destroys it! How does it "enhance" the environment? Again it doesn't, it digs it up and concretes over it.

So if the proposal for the Garden Village does not meet your own criteria it cannot be suitable as a suggestion.

The proposed site is a lovely green field site. This must not be built on. It provides a rural scene, which is attractive as you enter Lowestoft from the north. Building on this site will spoil forever this lovely entry to the town. And will never be able to be replaced.

We are a town that needs tourists to support our economy; large developments in inappropriate areas will not be a way of attracting tourists.

The land also supports a wide variety of wild life. Their habitats and feeding areas will be lost forever. This is not acceptable in the 21st Century. We have a duty to respect and preserve our environment.

We also have a duty to future residents of Lowestoft and to visitors to maintain our green fields and the attractiveness of our town. As you say we must "protect" our environment.

ROAD SAFETY

Any proposed development must demonstrate that it is safe. The proposal
for the Garden Village is not safe.

The area proposed for development is renowned for road traffic accidents. Rackham's Corner, the Corton Long Lane junction and the roundabout connecting Blundeston Road with Oulton Broad regularly experience accidents, developing further this area, and the significant increase in traffic it will bring, will only create more accidents.

It is not acceptable to propose a development on both sides of one of the areas main routes, the A47. Access to the proposed school and shops will require pedestrians and cyclists to cross the A47 from one side to the other. Every crossing point will be a potential accident. If a residential area was already in existence it would be folly to plan a new main road through the centre of it - so why plan a development split by an existing main road?

The local roads around the development will be less safe for all users; they are already too busy. For example Blundeston Road is narrow; a tight squeeze in places when two vehicles meet, it has no safe pavement for pedestrians and is not fully lit.

Your first aim is to "improve the quality of life', by making the area less safe for all users this development fails to meet your own criteria.

TRANSPORT AND HEALTH

By proposing this development so far out of Lowestoft centre you are encouraging greater car use. This will put greater pressure on our roads and discourage healthier options like walking and cycling.

Your third vision is to "improve the health of the population". A simple and cost effective way of improving our health is to encourage more walking and cycling. This means placing housing developments in areas that are accessible on foot or by cycling to the amenities of the town. This proposed development is not close enough to the amenities of the town.

This development is not a healthy one for the residents. Residents will leave their front door, walk a few steps to their car and drive to work, the shops, restaurants etc. It fails to meet your third criteria.

LOCAL SERVICES

In your proposal for the garden village you mention shops and a school but greater thought needs to be given to all the other services needed to support 1400 homes. Hospitals, doctors and dentists are under pressure in the area with the current population. Your proposal will put a greater strain
on these and other services.

EMPLOYMENT

Lowestoft is an area of high unemployment. Planning large numbers of new housing will not solve the problem, it may well make the situation worse. Same number of jobs, more people, means greater unemployment.

The first priority should be to create more jobs for the area, then plan if more housing is needed.

IN CONCLUSION

You set out what you want to want to achieve in your First Draft Local Plan

• improve quality of life

• improve the health of the population

• protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Suffolk County Council (Corporate Land) Simon Cartmell

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<thead>
<tr>
<th>Section</th>
<th>Policy WLP2.12 - North Lowestoft Garden Village</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>581</td>
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<tr>
<td>Comment</td>
<td>Suffolk County Council as the land owner supports WLP2.12, subject to the adoption of a masterplan, covering access, distribution issues etc., as per the draft Waveney Plan. The land is currently subject to an agricultural tenancy, but vacant possession can be achieved once a grant of planning consent for an alternative use has been achieved.</td>
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Suffolk County Council Robert Feakes

Section: Policy WLP2.12 - North Lowestoft Garden Village

Comment ID: 1624

Comment:
• WLP 2.12 – There is no reference to archaeological work at present, but reference should be made in the supporting text and Masterplan policy to archaeological assessment to inform planning applications.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1706

Comment New strategic site either side of the A47(T) north of Lowestoft. Up to 1400 dwellings. Access from the A47, so HE will need to be consulted. Safe means of crossing A47 required to link the two sites, also the masterplan should ensure that the two sites are interconnected as much as possible and the A47 is not a barrier to sustainable means of travel. Speed Limit reduction may be desirable or essential depending on the design of the crossings and access points. Some scope to remove existing sub-standard access from the A47 which would help mitigate the impacts of the scheme. Cycle and pedestrian access required to Corton Long Lane and minor roads to the west of the site. The County Council would also seek new off site rights of way to provide recreation opportunities into the surrounding countryside, to the West linked to the existing access network in Blundeston and east into Corton and the coast path.

Full Transport Assessment and Travel Plan required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1663

Comment Pockets of surface water flooding across the site, natural surface water flow route along the norther boundary of the site

Attached documents
**Suffolk County Council Robert Feakes**

**Section**
Policy WLP2.12 - North Lowestoft Garden Village

**Comment ID**
1651

**Comment**
Policy 5 of the Minerals Core Strategy safeguards sand and gravel resources identified using data available from the British Geological Survey. The County Council will safeguard any site within the identified minerals consultation area from proposed development in excess of one hectare or areas falling within 250m of sites within the Specific Site Allocation DPD. The following allocations are larger than one hectare and within the consultation area, however this is no reason to prevent the allocation of these sites as the County Council believes it to be unlikely that these sites would be exploited for minerals. The County Council will still need to be consulted as the minerals planning authority if planning applications do come forward on these sites, and would request consideration is given to using some of the on-site mineral resource in any resulting development, to reduce the amount of material transported on and off the site.

- Mixed Use Allocation policy WLP2.12

**Attached documents**
Suffolk County Council Robert Feakes

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1655

Comment Policy WDM1 of the Waste Core Strategy states that the County Council "will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made." The following site allocation policies are within proximity of waste facilities. Proposals on these sites must ensure that they do not prevent or prejudice the use of nearby waste facilities:

- Mixed Use Allocation Policy WLP2.12 – this site is within 400m of a sewage treatment works

Attached documents
<table>
<thead>
<tr>
<th>Suffolk Preservation Society Fiona Cairns</th>
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<tr>
<td><strong>Section</strong></td>
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<td><strong>Comment</strong></td>
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<td><strong>Attached documents</strong></td>
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</table>
Suffolk Wildlife Trust James Meyer

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1253

Comment The eastern part of this site was subject to wildlife audit in 2017 which recommended that a number of further surveys were required to establish the site's ecological value. This information is required to understand the potential ecological impacts of any proposed development and identify avoidance, mitigation and enhancement measures. Such survey and assessment work is also required for the western side of the site which was not covered by the audit. The policy should ensure that the necessary ecological surveys and assessments are secured should any development be brought forward at this site.

Any policy should ensure that any development in this location secures significant ecological enhancements, as well as any required mitigation or compensation measures.

Attached documents
Terry Peckham

Section  Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  30

Comment  I live in Corton Long Lane I object to the proposed development North Lowestoft village.

The planned proposal of 1400 homes will be to much for this area and destroy the village of Corton

The traffic that already uses Corton Long Lane and surrounding roads is growing daily with many cars speeding and making the area dangerous

1400 homes so close will be unbearable

we are a rat run between Lowestoft and the surrounding area this is just going to add to the problem

surely there’s an alternative location that protects our village and will keep traffic away and on the A47

please advise how I can object further

Regards

Terry Peckham

Attached documents
Terry Peckham

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 606

Comment No no no please to North Lowestoft village
corton will be ruined and over run

surrounding area is already becoming a nightmare the infrastructure cannot cooe

traffic is horrendous and the green areas dissapearing

can we not develop empty properties please

Attached documents
Valerie Solomon

Section  
Policy WLP2.12 - North Lowestoft Garden Village

Comment ID  
81

Comment  
First of all I am surprised that you didn’t contact people affected. I worked for WDC for 30 years and we always contacted neighbours whenever a planning application was to be considered.

However my main concern is that there is no red line around the properties at Taylor’s Farm Corton unlike those at Rackham’s Corner and Barn Owl Lodge.

I spoke to Sam who confirmed that there would be no compulsory purchase of our properties, three of which are fairly new and of very good quality.

I am willing to speak to you regarding any land which may be required for access and perhaps someone from the Planning Department would care to visit me and clarify this.

Valerie Solomon

Attached documents
**WH and D Ayers**

**Section**

Policy WLP2.12 - North Lowestoft Garden Village

**Comment ID**

1023

**Comment**

We would like to put some points to the Team regarding the draft local plan WLP2.12 "North Lowestoft Garden Village".

We object to this draft plan on the following points:

* The placing of 1,400 dwellings so close to the present village of Corton would create many problems for the village.

* There would be desecration of the surrounding woods, which at the moment are protected by the fact of having fields all around them. Having houses right up to one side of the woods will spoil the village of Corton as it stands, losing iconic views of the countryside, scenery, and idyllic walks.

* The building of 1,400 dwellings - plus a school, shops, businesses, etc. over a period of 10+ years will threaten wildlife habitats, migratory birds, Sky Larks, etc. There are Twitchers who come from miles away to see rare visiting birds. There will also be the loss of farmland.

* We feel that with a major development on the A47 may cause the loss of the present excellent bus service, with buses no longer coming through the present village, but going to the new "Garden Village" on the A47.

* The addition of at least 1,400 vehicles trying to get out of the new village onto the A47 - assuming a method of getting on to the A47 can be found - every day will lead to huge traffic problems for people from Corton, Blundeston, and even Oulton, with people using the village’s roads as "rat runs" to avoid all the traffic that will come through from the 3rd Crossing.

* There will be extra pressure on all the local amenities, especially the James Paget hospital, which is already overstretched and struggling to serve the locality. The Ambulance service would also be badly affected. Also, the pressure on the Police Force, who are rarely seen in Corton, will be increased with the possibility of crime rising in the area with the extra 3,000 people living in the locality.
* With the land on the west side of the A47 by Jay Lane having no woods, and very little human habitation, it would be a better site with plenty of land should there be a need to expand in the future, this would also give a better chance of getting access safely on to the A47!

Attached documents
William Ayres

Section Policy WLP2.12 - North Lowestoft Garden Village

Comment ID 1107

Comment

We would like to put some points to the Team regarding the draft local local plan WLP2.12 "North Lowestoft Garden Village"

We object to this draft plan on the following points:

* The placing of 1,400 dwellings so close to the present village of Corton would create many problems for the village!

* There would be desecration of the surrounding woods, which at the moment are protected by the fact of having fields all around them. Having houses right up to one side of the woods will spoil the village of Corton as it stands, losing iconic views of the countryside, and idyllic walks.

* The building of 1,400 dwellings - plus a school, shops, businesses, etc over a period of 10+ years will threaten wildlife habitats, migratory birds, Sky Larks, etc. There are Twitchers who come from miles away to see rare visiting birds! There will also be a loss of farmland.

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* The addition of at least 1,400 vehicles trying to get out of the new village onto the A47 - assuming a method of getting on to the A47 can be found - every day will lead to huge traffic problems for the people from Corton, Blundeston, and even Oulton, with people using the villages roads as "rat runs" to avoid all the traffic that will come through from the 3rd Crossing.

* There will be extra pressure on all the local amenities, especially the James Paget Hospital, which is already overstretched and struggling to serve the locality. The Ambulance service would also be badly affected. Also, the pressure on the Police Force, who are rarely seen in Corton, Will be increased with the possibility of crime rising in the area with the extra 3,000 people living in the locality.
* With the land on the west side of the A47 by Jay Lane having no woods, and very little human habitation, it would be a better site with plenty of land should there be a need to expand in the future, this would also give a better chance of getting access safely on to the A47!!

p.s Would you honestly like to lose views like this!

Attached documents
Policy WLP2.13 - Land North of Union Lane, Oulton

Anonymous

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 719

Comment We wish to put forward the following comments regarding the Waveney First Draft Local Plan

These are in relation to the preferred sites for development in Oulton.

WLP2.13 land north of Union Lane .... 140 new homes.

WLP2.14 land between Hall Lane and Union Lane .... 200 new homes.

Hall Lane will become something resembling an A road, we cannot see how it can cope with all the extra traffic WLP2.14 will generate, it is after all what it says a Lane with sharp double bends which cannot be seen round until one is on them. Although this has a 30mph limit as cars/ lorries / motorbikes are approaching open countryside it is a regular occurrence for traffic to do far in excess of this speed.

A road is already planned to come out onto Hall Lane from the Woods Meadow development which is a development of 800 - 900 properties. That will equate to over 1,000 properties having the prospect of coming out onto a Lane ... even though we appreciate that not every vehicle will use this route out of Woods Meadow .... every vehicle will have to exit the proposed estate of 200 dwellings onto Hall Lane, and very few properties have one vehicle nowadays often far in excess of this, this will present an unprecedented amount of potential traffic onto a road/lane in no way able to cope with it. Even at present we have great difficulty exiting our property onto Hall Lane at certain times. I would hope that the views of residents who have to live in these areas would be taken notice of when considering your plans.

Also to be taken into account are the properties/ care home etc with the resulting traffic that these buildings will generate....to be built at the old Blundeston prison site and the prospect of development at other sites such
as at Somerleyton and Lound all of which could very well use Hall Lane and Oulton to reach other destinations and often do.

This is a very short sighted strategy which will have very long reaching repercussions in the years to come. Should we not see first what the results of a development of 800 - 900 properties will have on our area.

Oulton will be swamped in developments and dreadful traffic problems not to mention the already well overstretched medical facilities and school places, before the new school at Woods Meadow is even started there are questions being asked regarding where land will come from for further expansion. There is no guarantee that G.P's will want to come to this area to service a new surgery, as you will be aware a ready made surgery was available at the old Oulton Medical Centre and no GP's wished to take this on and practice here. There is a chronic shortage of G.P's in the whole country.

There is talk that an existing surgery could move into the new Woods Meadow building but surely that in no way solves the problem, that still leaves where the majority of the new patients from your proposed developments will go.

Gorleston Road has a 20 plus minute tailback at peak times at present from the Oulton Broad roundabout Somerleyton Road has a HGV problem converging onto the Aldi traffic lights, another problem with congestion.

Mobbs Way Industrial Estate with HGV’s vehicles coming out onto the extremely busy Gorleston Road, another problem.

The mini roundabout at Hall Lane, Oulton Street, Somerleyton Road, Gorleston Road is already extremely busy at peak times with lengthy tailbacks even before the prospect of all the extra traffic these developments will create.

The junctions at Dunstan Drive and Sands Lane onto Gorleston Road are accidents waiting to happen. Indeed there have been regular collisions at the Hall Lane roundabout.

Hall Lane has two street lights and a footpath of a very short distance and then nothing, do you propose people walk on the road!!!

The Grade II* listed Manor House will be enveloped in development this is an important historical building and Historic England have been informed regarding this, This must be investigated archaeologically to protect our
Wildlife must also be considered as this area is a haven for all sorts of species.

This area is also a equestrian area with many horses using Hall Lane, they have already lost many of their bridle paths to the Woods Meadow development. A large number of cyclists also use this Lane including cycle clubs. The implication of all this development is a thought not worth contemplating.

Hall Lane has no mains drainage and the existing dwellings have septic tanks/pumping stations, it is a well know fact nationally that ill thought out building sites in the rush to build homes at any cost have resulted in catastrophic results not only to new residents but to existing ones with all the long term problems these bring. The fields on Hall Lane already become boggy and waterlogged with just ordinary rainfall, all this at a time when all the research shows we can expect and have seen... much heavier and more prolonged rainfall.

Oulton Street has extremely narrow pavements and when HGV lorries use this road...which they regularly do...a small child is in danger of being sucked into the road, the preferred sites would compound this problem with the extra traffic it will generate in the future, plus the development traffic once sites are being developed.

What has happened to the physical limits? which were a boundary regarding future developments and the government promise of building on brownfield first, the Hall Land/Union Lane preferred site is definitely greenfield and outside the physical limits.

Site WLP2.13 is again going to have all the traffic from 140 properties coming out onto an extremely busy and narrow B road which much of the through traffic from Oulton Broad and beyond use to get to the A47 and is completely unsuitable for all this extra traffic.

There is also an historical burial site which belonged to the old workhouse where a large number (192 I believe) of the residents were laid to rest, this surely should not be disturbed or hemmed in with development, and treated with the respect it deserves.

This is a very ill thought out plan for Oulton with no consideration given to infrastructure and facilities, just because one is tasked with finding sites for development surely some thought needs to be given to the effect on
existing residents and the surrounding areas. So often one hears that problems will be dealt with as and when they occur but rarely are.

I HOPE THE ABOVE THOUGHTS AND COMMENTS WILL BE GIVEN THE CONSIDERATION THEY DESERVE AS YOU PROGRESS WITH YOUR PLAN.

Attached documents
Broads Authority Natalie Beal

Section  Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID  491

Comment  There are some site allocations around Oulton and Oakes Farm, off Beccles Road, Carlton Colville which although not adjacent, are close to and would push the built form of Lowestoft towards our boundary.

Attached documents
Environment Agency

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 864

Comment We would support this policy and welcome the inclusion of the need to assess and if required remediate the site for any contamination related to its past use.
Historic England

Section  Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID  1380

Comment  This site incorporates the location of the former Oulton Workhouse complex. There are no remaining buildings relating to the Workhouse and the site is not designated. However, we note that the site includes the burial ground for the former workhouse and advise that Suffolk County Council archaeological service is consulted about this allocation. We would note that the mention of the burial ground in the supporting text and policy is that development should be avoided on the burial ground.

Attached documents
Karma McLean

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 246

Comment Hello,

For all of the reasons below and many more that I'm sure others will include, I do not think this is a plan that should be continued with and I do not agree to any of the proposals being put forward.

* Pathways:- The pathways are far too narrow than run from Union lane past the Blue Boar and towards Somerleyton road. It is hard to push a buggy down the path as they are too narrow and if cars path each other their wing mirrors intrude over the pathway because the road itself is far too narrow. It is absolutely not possible to push a double buggy down either of the paths running from Union Lane to Somerleyton Road.

* Access:- Access onto Parkhill from Union lane is very difficult now so further traffic on Parkhill and further cars coming out of Union Lane or anywhere onto Parkhill will cause traffic jams, frustrated drivers and possible accidents by impatient drivers.

* Roads:- The road running past Parkhill Hotel itself has had many accidents in the past and cannot cope with the traffic that is already being directed through Oulton, let alone the Woods Meadow and then this development. The speed has been reduced to 40 mph but accidents have still happened in the area. More heavy traffic directly through this area will only add to further accidents.

* Infrastructure:- I do not see how the infrastructure is available in Oulton to cope with the 600 - 800 hundred houses already being built at woods Meadow which is less than 1 x mile away from this proposal. Why are more houses required so close to an already massive development?

* It is already impossible for 2 x trucks to pass on the narrow road passing Blue Boar so adding more traffic in this area could have major implications on the increasing people who will be using the roads and paths.
* Pedestrian Crossing:- The pedestrian crossing on Parkhill is not lit up enough and so many cars come past when pedestrians are trying to cross. The crossing needs to be made more visible at the moment. More peoples and more cars will not help the safety of this crossing.

* Wildlife:- With the incredibly high number of houses on the Park Hill estate, and Woods Meadow, the wildlife is being pushed further out and has taken to living in the field next to Spinney Farm along Parkhill where this plan is.

* Noise Pollution:- Noise pollution - Parkhill Hotel has several complaints for noise from local residents. There will be more residents creating more noise and more traffic creating more noise so noise pollution will be increasing in this small village in such a small area.

For all of the reasons above and many more that I'm sure others will include, I do not think this is a plan that should be continued with and I do not agree to any of the proposals being put forward.

Regards,

Mrs McLean

Attached documents
Lee Mason and Alison Lund

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 790

Comment Having spent some time examining the proposals set forward in the Draft Local Plan, we would like to comment on the areas designated WLP 2.14 (land between Hall Lane and Union lane, Oulton) and WLP 2.13 (land north of Union Lane, Oulton) and explain in detail why we would like to suggest that this area is unsuitable for the proposed development. While we are mindful of the housing need in Waveney, and the pressure from central Government to meet specific targets in this respect, it seems clear to us that development of this land is extremely problematic and should be set aside. We understand that there is sufficient leeway within the current draft proposals for these sites to be excluded without compromising the requirement for new homes mandated by Central Government.

Policy CS04 requires that any development consider the infrastructure requirements needed to support and service any proposed development. The most pressing reason for rejecting the two proposed sites is undoubtedly the severe problems any such developments would cause in respect of local road traffic infrastructure. Neither of the proposed sites can be adequately accommodated within the existing road system nor is there any reasonable prospect that the system could be improved to make them possible.

In the case of WLP 2.13, it is proposed that a development of 140 houses would have a road exit directly onto Parkhill (B1375). Parkhill is a notorious accident black spot already and the addition of so much extra traffic, regardless of which direction it then travelled, would only make things much worse.

For traffic heading northbound towards Yarmouth, the road is quite narrow and has a number of bends, a factor that has lead to at least one notorious fatality on this stretch and numerous minor accidents. In the event of the construction of North Lowestoft Garden Village (WLP2.12) this road would become the most direct route for many of the residents of the proposed 1,400 new homes and businesses should they wish to access south.
Lowestoft via the bridge at Mutford Lock. Even if the proposed third crossing is built as planned, traffic using this route will cross the river into Kirkley and Pakefield whereas any traffic wishing to access Oulton Broad and then onwards to Beccles and Norwich would logically find the most direct route to be along Parkhill, causing a large and sustained increase in both private and commercial traffic, as the new Spine Road (A117) leads traffic towards the new crossing instead. Unless measures are taken to limit or exclude traffic, much of the increase will inevitably find itself heading along Parkhill as the more direct route.

For traffic heading south towards Lowestoft, Oulton Broad, Beccles and Norwich, the situation is even worse as it would almost immediately have to pass through Oulton Street. This is an extremely narrow section of road with a Zebra Crossing. The 20mph speed limit on this section is an indication of how dangerous this section of road can be, yet it is already routinely ignored by speeding drivers. At a recent meeting of local residents it transpired that nearly everyone present had either been involved in a traffic accident at this point or had seen a very near miss -1 myself was present when a speeding driver nearly hit a young child using the crossing there.

In recognition of this point it was decided some years ago that it would be necessary to narrow the road at the point of the crossing to make the Belisha Beacons clearer to traffic and impose a weight limit to prevent HGBs using this stretch as the extremely narrow road and almost non-existent pavements on both sides made heavier traffic very dangerous to pedestrians. Inexplicably, however, the mandated work was never carried out and instead the traffic calming measures then in place were removed. This road has become busier than ever, despite the completion of the new spine road parallel to it, and to add potentially another 250-300 vehicles to this stretch by building on WLP 2.13 would be to make an already overstretched section of road untenably dangerous for both road users and pedestrians.

A further problem with the proposed new housing exiting onto Parkhill is that given that the existing road is already quite busy, notably around the morning and evening rush hours, traffic wishing to leave the new road will likely be forced to wait for some time before being able to join Parkhill. This is already noticeably the case with traffic leaving Union Lane, which only has about half the number of proposed houses. This creates a pinch point which results in stopped traffic emitting fumes for up to five minutes while waiting to exit the lane. Presumably a road serving twice the number of
houses will see twice the number of delays and the associated environmental pollution.

Archaeology and History

WLP 2.13 is partially on the site of the historic Oulton Workhouse and the north western portion of the site contains the burial ground for this establishment which cannot of course be developed. The rest of the site also has a high likelihood of containing archaeological material relating to the history and environment of the workhouse which would likely be damaged or destroyed by the proposed development.

Conclusion

As stated above, we are well aware of the pressure from central Government to build large numbers of new homes in Waveney. Whatever the arguments for and against that proposition, we have endeavoured to explain why we feel that the reasons for the historical refusal of permission to build on the sites now designated WLP 2.13 and WLP2.14 over the past 30 years remain valid and should be upheld in future. If such a proposal is accepted, we feel that it will not only bring traffic chaos and frequent gridlock to this part of Oulton but that an important part of the village's historical, social and natural character will be irrevocably lost for the sake of what is a very small part in a very large programme. We urge that these sites (and especially 2.14) be dropped from the final version of the local plan.

Attached documents
Mandy Green

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 1194

Comment With reference to the above consultation I wish to object to the inclusion of the three areas (above) covering the Parish of Oulton where I live.

I have two arguments as to why the proposals should not be within the local plan.

Firstly we already have Woods Meadow with in excess of 800 homes currently being built and without finding out first how this huge development will impact on Oulton I cannot understand how you can agree to an extra 340. I do understand the need for building of new homes but in a measured way which will gradually have the necessary infrastructure improvements being added and that brings me on to my second reason, that of the recent questionnaire that I was asked to complete which is helping to develop plans for the future of Oulton covering housing, services, recreation, and our open countryside amongst other issues. What is the point of asking us on the one hand for our views as to how we see the future of our village whilst telling us that you are allocating more land for housing in Oulton?

Surely it would common sense to allow the process of the Neighbourhood Plan to be completed and then use that plan to highlight areas that the community want to see developed along with the other issues contained within the Neighbourhood Plan Questionnaire.

If you proceed with your proposals as contained within your consultation I cannot see any benefit from continuing with a Neighbourhood Plan.

Attached documents
Mark Cubitt

Section
Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID
763

Comment
In regard to the 340 new houses proposed behind Union Lane in Oulton.

I was shocked and disappointed to find out the proposal of these in houses within Oulton. I am left wondering has anyone who is responsible for these decisions actually visited the proposed area? I am a teacher at the local High School within a five minute walk of this beautiful Green Belt land where I regularly walk and watch barn owls hunt and dear graze after work.

My main concern is for the safety of my pupils. I have witnessed many near misses due to drivers not paying attention, speeding through Oulton Road which is supposedly a 20mph road and you are taking your life into your own hands on the zebra crossing as the majority of the drivers speed up instead of stopping to let you cross as 30 meters up the road it is the national speed limit.

With the additional houses already being built behind Sands land with no new School being built, a doctors surgery already empty in Oulton since its closure a couple of years ago where are all these new people going to go?

I find it a farcical that planning permission was thrown out by the council last year for developing on this land which has ancient hedgerows by a local developer but now when the council wants to build on the site it is suddenly it is ok.

Attached documents
Norman Castleton

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 384

Comment Land North of Union Lane, Oulton

This area should be retained as a green space. It is not sustainable if built on for housing to a density of 25 dwelling per hectare = 143. Neither as is claimed in the introduction is the site within reasonable distance of austerity level services. Therefore, I would assume that the site will be dismissed because of the strictures of the site specific criteria. Developments of this type should only be allowed on brown field sites.
Oldman Homes Philip Oldman  
Ingleton Wood LLP (Iain Hill)

Section  
Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID  
964

Comment  
Background

On behalf of Oldman Homes, we strongly support the proposed allocation of the above site under Policy WLP2.13 for the residential development of approximately 140 dwellings. It is, however, requested that minor alterations are made to the proposed wording of the Policy to ensure efficient use is made of the site and that it is consistent with other policies in the First Draft Local Plan.

In terms of the proposed allocation, the site is considered to be entirely deliverable and capable of making a significant contribution towards satisfying the Council’s residual housing need during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable. These matters are addressed in further detail below.

Assessment of Deliverability

Suitable

The site is located immediately adjacent to the defined Settlement Boundary for Lowestoft under Policy WLP 2.13, which due to the availability of infrastructure, amenities and services is identified as the most sustainable location for development within the District. The site, therefore, clearly represents a sustainable location for residential development.

Due to the site’s location immediately adjacent to the Settlement Boundary, the proposed allocation of the site represents an opportunity to accommodate residential development, for which there is a clear need, through a logical extension that will create a clear and defensible boundary.
to the settlement. The scale of development proposed is considered appropriate to the location and can be accommodated without a significant extension of the built-up area.

In addition, the site, in part, constitutes previously developed land given that it was part of the former Lothingland Hospital. The development of this site would, therefore, in accordance with the NPPF, encourage the effective reuse of previously developed land.

The site also has potential to be developed with limited impact on the surrounding area. The site is not located in a sensitive landscape setting and, subject to appropriate design / landscaping measures, can be incorporated into the urban area. This is recognised at paragraph 2.77 of the draft Local Plan, which states that the site would be unlikely to have an impact on the landscape of the surrounding area, and Draft Sustainability Appraisal (2017). Due to the use of the site for storage, the development of the site is considered to present an opportunity to enhance the appearance of the site.

The proposed development of the site is not constrained by environmental or heritage assets. There are no such assets on site and whilst Workhouse Wood, a County Wildlife Site, is located 150 metres to the west of the site, it is considered that the site can be developed to ensure it would not have an adverse impact on the site.

Similarly, whilst there are two Grade II listed buildings opposite the site, sensitive development of the site will ensure that the heritage assets are not harmed by the proposed development.

The site is also suitable in terms of highways and accessibility. As detailed in draft Policy WLP2.13, suitable vehicular access to the site can, in principle, be delivered through the provision of a new junction between the site and Parkhill. Furthermore, whilst the site is located in close proximity to existing public transport infrastructure, notably bus routes and the National Cycle Route, it is, in accordance with draft Policy WLP8.21, capable of incorporating measures to encourage travel by non-car modes. It will also provide an opportunity to enhance infrastructure, such as the pavement on Parkhill, to the benefit of the wider community.

Available

The site is within single ownership and is available for development immediately. It is envisaged that housing can, subject to the grant of
planning permission, start being delivered on the site within 5 years.

Viability

Development of the site for residential purposes is considered viable, taking into consideration the policy requirements in relation to matters such as affordable housing provision and CIL contributions.

Proposed Amendments to Policy WLP2.13

Notwithstanding the foregoing, it is requested that minor alterations are made to the draft Policy to ensure that the opportunities afforded by the site are maximised.

As drafted, the Policy advises that development at a density of 25 dwellings per hectare is proposed due to the rural character of the site. However, it is not considered that the site is rural in its character and therefore the density of development on the site should not be restricted.

Whilst located on the edge of Oulton, the site is, in part, part of the former Lothingland Hospital and is seen in the context of existing residential development to both the east and west. As detailed above, it is considered that the site can be developed to have minimal impact on the surrounding area in landscape terms.

Furthermore, due to the size of the site and the scale of development proposed, the opportunity exists to provide a layout which incorporates a range of housing types and densities, reflecting local need and ensuring a balanced community. For example, it may be possible to provide lower density development on the periphery of the site, while developing higher density development toward the centre of the site / in locations within proximity of existing residential development. This transitional approach is advocated on land to the south allocated under Policy WLP2.14, which is considered to have the same characteristics in terms of landscape value as this site.

It is, therefore, recommended that in order to ensure the efficient use of land in a location that is recognised as being sustainable, the wording of the Policy is revised to state that the site will be developed at a density of approximately 30 dwellings per hectare, unless local character indicates otherwise. This would result in a consistent approach with Policy WLP8.30 and the site having capacity to provide approximately 170 dwellings. The increased quantum of development on the site would reduce the need to develop on other sites within the District, particularly those in rural areas.
and which are considered less sustainable.

Furthermore, it is considered unreasonable to restrict the density of development until further feasibility work has been undertaken to demonstrate the capacity of the site, having regard to identified site constraints and opportunities.

Revising the density of development to 30 dwellings per hectare would ensure consistency with other similar sites allocated for residential development; notably land immediately to the south (Policy WLP 2.14) which is considered to be similar in terms of its character.

The land immediately to the south of the site is allocated in the draft Local Plan as Open Space, although the site, which is overgrown, is understood to have limited use. Whilst the need to provide Open Space as part of any development is recognised, it is recommended that the Policy also acknowledges that opportunities may exist to reduce the level of Open Space required on site though improvements, by way of commuted sums, to existing Open Space within proximity of the site.

The proposed revisions to Policy WLP2.13 are detailed / underlined below.

Land north of Union Lane, Oulton (5.70 hectares) as identified on the Policies Map is allocated for a residential development of approximately 140 170 dwellings.

The site should be developed in accordance with the following site specific criteria:

* The site will be developed at a density of approximately 25 30 dwellings per hectare having regard to local character.

* Vehicular access should be off Parkhill. An additional pedestrian and cycle access should be provided on to Union Lane. The pavement on Parkhill should be extended to the site entrance.

* A play space equivalent to a local equipped area for play of approximately 0.4 hectares in size should be provided. Consideration will also be given to the enhancement of existing Open Space within the locality through the payment of commuted sums.

* A full site investigation report assessing the risk of ground contamination should be submitted with any planning application.

* A Transport Assessment and Travel Plan should be submitted with any
planning application.

* A planning condition relating to archaeological investigation will be attached to any planning permission. Development should avoid the historic burial ground to the north west of the site.

* A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.

Summary

As outlined above, the site is suitable, available and viable, and therefore deliverable. On this basis, the site’s allocation for proposed residential development is considered to be entirely appropriate, and would represent sustainable development. Environmentally, this site is not considered to occupy a sensitive location and measures can be incorporated into any development to ensure there is no adverse impact on heritage or environmental allocations. The site is, furthermore, located, in part, on previously developed land and due to its proximity to the settlement boundary, provides a logical extension to Oulton. In addition, the site is well connected in terms of its proximity to services and facilities and through improvements as part of the development can help facilitate improvements to public transport and cycle links. In economic terms, the development of this site would reuse a part brownfield site and, as well as providing jobs through construction, would provide access to local employment in a highly sustainable location. In terms of the social benefits of the project this site would provide much needed accommodation in a sustainable location.

The proposed allocation under Policy WLP2.13 is, therefore, supported but revisions to the Policy are sought to revise the approximate density of development to ensure a consistent approach between policies, and maximise the opportunities it provides.
Oulton Parish Council Lynne Ward

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 1072

Comment

Oulton Village has existed since the 1400s-1700 Years, the Village has a varied and interesting past, Hospital, Workhouse, Pill Box and is possible a good Archaeological site, in the north corner of WLP 2.14 a Burial site, which we feel should be investigated, returned to its original state to give respect to peoples loved ones, the Grade II* Listed Manor House the Green belt WLP 2.13 behind and to the west and north of it, also Green belt WLP 2.14 land to the north of the village is a cornerstone of our Oulton Village Rural Heritage, once this land is used for housing the village will no longer exist and will be at the target for it to no longer be a Village Parish Council but a Town council.

The proposed density of housing for WLP 2.13 Of 25 and WLP 2.14 30 Houses Per Hectare is too much and is not innkeeping with the density and type of housing already existing in the original Village, if carried forward it will destroy the original Village.

Attached documents
Roger and Karen Hillier

**Section** Policy WLP2.13 - Land North of Union Lane, Oulton

**Comment ID** 888

**Comment** We would like to formally object to the land surrounding Union Lane and specifically the land north of Union Lane. Please read my objections as listed below.

With this development the village would become so large as to not be a village anymore, just a continuation of Oulton Broad/Lowestoft.

The roads are already congested in this area and getting out of Union Lane onto the main road can be very difficult due to the volume of cars and also the speed of them. Twelve years ago I was involved in a head on collision while pulling out of Union Lane. A car was over taking heading into the village right on the junction. This could have been a lot worse for me and my young son, as the driver of the car involved was impatient with the car he was following into the village who was observing the speed limit. As a result of the impact all three cars were written off and the driver was convicted of dangerous driving.

Surrounding the proposed development are a lot of trees and hedges of various species, some of these are very old and need to be protected.

Having lived here a number of years we have enjoyed the nature that surrounds us in the proposed development. We have had visits from Deer, Foxes, Tawny Owls, a Barn Owl and a vast number of other birds, these would be seriously affected by any development.

We live in a house with small garden that would be seriously affected by these houses being built in this area as we would totally loose the privacy in our house and garden as they would be so close to our property.

Land water drainage has always been a problem for us as we have a drainage ditch adjoining our garden and this has at times over the years been very close to overflowing onto our property. At times there has been so much water for long periods of time that we have had ducks swimming in it. The soil in our garden gets very waterlogged during the winter so we
have to try and avoid walking on our grass. Building on this site will just make this situation even worse as there will be more water going into these ditches from the buildings rather than soaking into the land as it would have done. Having walked on the fields surrounding us I can tell you they get as waterlogged as our garden or worse.

The sewage system has also been of great concern from time to time due to the pipes running down the land towards the old hospital and then needing to be pumped by the old pumping station. We had so many problems that we invested in our own drainage rods!

The Old Hospital, now gone, was previously a Workhouse and I believe people who died while staying there were buried in the surrounding area so this needs accounting for and respected. There could also be areas of Archaeological interest in this area due to the lands previous uses.

Attached documents
Stacy Goddard

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 553

Comment I'm very concerned on the amount of traffic this will add to an already busy area. Sands Lane development has not even finished yet and already creating a backlog at the roundabout on Gorleston Road.

The ‘20mph' + zebra crossing area is a hazard I have 2 children and like going to the park but no one abides by this zebra crossing + is very dangerous! I nearly got knocked over yesterday!

The field + area around Union Lane has historical and wildlife value. This needs reassessing immediately and has been seriously overlooked.

Historical hedgerows have already been taken down with no prosecution. How will you preserve the area?

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID 1625

Comment • Land North of Union Lane, Oulton supporting text (Page 71) and policy WLP2.13 (page 72). This merges two allocations from Issues and Options stage (17 and 84), and upfront work should be required rather than archaeological work by condition, referenced using Waveney's wording for this clause as is adopted throughout. In addition for WLP2.13, the County Council suggests amendment of sentence 'Development should avoid the historic burial ground to the northwest of the site' to 'Development should avoid impacts on and enhance the historic burial ground to the northwest of the site'.

Attached documents
Suffolk County Council Robert Feakes

Section          Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID      1707

Comment          Main vehicular access from Parkhill plus additional sustainable links
                 Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.13 - Land North of Union Lane, Oulton

Comment ID  1664

Comment  Surface water flood risk from ordinary watercourse which traverses through the site

Attached documents
**Suffolk Wildlife Trust James Meyer**

**Section**  
Policy WLP2.13 - Land North of Union Lane, Oulton

**Comment ID**  
1254

**Comment**  
This site was subject to wildlife audit in 2017 which recommended that a number of further surveys were required to establish the site's ecological value. It is noted that the policy includes the requirement that any planning application for the site be accompanied by an ecological assessment. Any development at this site must not only be accompanied by an ecological assessment, but must also protect any habitats of ecological value on the site and include measures to mitigate or compensate any impacts and measures to enhance the site's value for wildlife.

**Attached documents**
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Angela Waterman

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
893

Comment  
Absolutely wrong for this planning to go ahead. There is no need whatsoever to build on a green field! Leave us a little bit of countryside. Union lane is so busy for a village road anyway, with works traffic to the care home etc. Any more would be dangerous. It already floods into Union Lane when we have rain. Let alone if you build on the field also. These people have paid a premium price for their homes to be where they are, have the views that they have. I personally have seen wild life on that field, deers, foxes, heron, owls, etc. The name is Oulton Village!! a village, not a town and doesn’t need to be made into one! Leave the countryside alone.

Attached documents
Anonymous

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 543

Comment I feel that Hall Lane is a "Lane" and should be kept so. The amount of traffic that uses it now is quite busy at peak times. The increase of proposed dwellings will have a very serious effect on our environment and existing properties in this beautiful area, also the effect on wildlife etc and the rat-run it will create.

Attached documents
Anonymous

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 725

Comment We wish to put forward the following comments regarding the Waveney First Draft Local Plan

These are in relation to the preferred sites for development in Oulton.

WLP2.13 land north of Union Lane .... 140 new homes.

WLP2.14 land between Hall Lane and Union Lane .... 200 new homes.

Hall Lane will become something resembling an A road, we cannot see how it can cope with all the extra traffic WLP2.14 will generate, it is after all what it says a Lane with sharp double bends which cannot be seen round until one is on them. Although this has a 30mph limit as cars/ lorries / motorbikes are approaching open countryside it is a regular occurrence for traffic to do far in excess of this speed.

A road is already planned to come out onto Hall Lane from the Woods Meadow development which is a development of 800 - 900 properties. That will equate to over 1,000 properties having the prospect of coming out onto a Lane ... even though we appreciate that not every vehicle will use this route out of Woods Meadow .... every vehicle will have to exit the proposed estate of 200 dwellings onto Hall Lane, and very few properties have one vehicle nowadays often far in excess of this, this will present an unprecedented amount of potential traffic onto a road/lane in no way able to cope with it. Even at present we have great difficulty exiting our property onto Hall Lane at certain times. I would hope that the views of residents who have to live in these areas would be taken notice of when considering your plans.

Also to be taken into account are the properties/ care home etc with the resulting traffic that these buildings will generate....to be built at the old Blundeston prison site and the prospect of development at other sites such as at Somerleyton and Lound all of which could very well use Hall Lane and
Oulton to reach other destinations and often do.

This is a very short sighted strategy which will have very long reaching repercussions in the years to come. Should we not see first what the results of a development of 800 - 900 properties will have on our area.

Oulton will be swamped in developments and dreadful traffic problems not to mention the already well overstretched medical facilities and school places, before the new school at Woods Meadow is even started there are questions being asked regarding where land will come from for further expansion. There is no guarantee that G.P’s will want to come to this area to service a new surgery, as you will be aware a ready made surgery was available at the old Oulton Medical Centre and no GP’s wished to take this on and practice here. There is a chronic shortage of G.P’s in the whole country.

There is talk that an existing surgery could move into the new Woods Meadow building but surely that in no way solves the problem, that still leaves where the majority of the new patients from your proposed developments will go.

Gorleston Road has a 20 plus minute tailback at peak times at present from the Oulton Broad roundabout Somerleyton Road has a HGV problem converging onto the Aldi traffic lights, another problem with congestion.

Mobbs Way Industrial Estate with HGV’s vehicles coming out onto the extremely busy Gorleston Road, another problem.

The mini roundabout at Hall Lane, Oulton Street, Somerleyton Road, Gorleston Road is already extremely busy at peak times with lengthy tailbacks even before the prospect of all the extra traffic these developments will create.

The junctions at Dunstan Drive and Sands Lane onto Gorleston Road are accidents waiting to happen. Indeed there have been regular collisions at the Hall Lane roundabout.

Hall Lane has two street lights and a footpath of a very short distance and then nothing, do you propose people walk on the road!!!

The Grade II* listed Manor House will be enveloped in development this is an important historical building and Historic England have been informed regarding this, This must be investigated archaeologically to protect our history.
Wildlife must also be considered as this area is a haven for all sorts of species.

This area is also an equestrian area with many horses using Hall Lane, they have already lost many of their bridle paths to the Woods Meadow development. A large number of cyclists also use this Lane including cycle clubs. The implication of all this development is a thought not worth contemplating.

Hall Lane has no mains drainage and the existing dwellings have septic tacks/ pumping stations, it is a well know fact nationally that ill thought out building sites in the rush to build homes at any cost have resulted in catastrophic results not only to new residents but to existing ones with all the long term problems these bring. The fields on Hall Lane already become boggy and waterlogged with just ordinary rainfall, all this at a time when all the research shows we can expect and have seen ... much heavier and more prolonged rainfall.

Oulton Street has extremely narrow pavements and when HGV lorries use this road ...which they regularly do...a small child is in danger of being sucked into the road, the preferred sites would compound this problem with the extra traffic it will generate in the future, plus the development traffic once sites are being developed.

What has happened to the physical limits ? which were a boundary regarding future developments and the government promise of building on brownfield first, the Hall Land/ Union Lane preferred site is definitely greenfield and outside the physical limits.

Site WLP2.13 is again going to have all the traffic from 140 properties coming out onto an extremely busy and narrow B road which much of the through traffic from Oulton Broad and beyond use to get to the A47 and is completely unsuitable for all this extra traffic.

There is also an historical burial site which belonged to the old workhouse where a large number (192 I believe) of the residents were laid to rest, this surely should not be disturbed or hemmed in with development, and treated with the respect it deserves.

This is a very ill thought out plan for Oulton with no consideration given to infrastructure and facilities, just because one is tasked with finding sites for development surely some thought needs to be given to the effect on existing residents and the surrounding areas. So often one hears that
problems will be dealt with as and when they occur but rarely are.

I HOPE THE ABOVE THOUGHTS AND COMMENTS WILL BE GIVEN
THE CONSIDERATION THEY DESERVE AS YOU PROGRESS WITH YOUR PLAN.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 1453

Comment We support this allocation.

We note the requirement for vehicular access only from Hall Lane and for the open space (1ha) to be provided on that frontage. It would be helpful if the need for this site to be developed jointly with adjoining land was more explicitly set out so that it is clear that the open space provision serves all the allocation and is an integral part of the scheme. We have some reservations about the preservation of hedgerows within the site layout. Whilst we understand the ecological case for this and can often make for awkward boundary arrangements between properties.

Attached documents
Broads Authority Natalie Beal

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 492

Comment There are some site allocations around Oulton and Oakes Farm, off Beccles Road, Carlton Colville which although not adjacent, are close to and would push the built form of Lowestoft towards our boundary.

Attached documents
Carly Saunders

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 1034

Comment I strongly object to the proposed inclusion of "Land Between Hall Lane and Union Lane" in the new Local Plan on the following grounds:

1. Wildlife: I have witnessed first hand the breadth of wildlife relying on this site: this includes populations of bats, owls, deer, foxes and harrier hawks. The bats and owls in particular could be materially impacted by development. Please see attached evidence of some of the wonderful wildlife we get to enjoy here.

2. Flood risk: The site provides for absorption of rain water and water from water sources at nearby Flixton; development could cause a significant risk to new properties, and to existing sites in the nearby/ potentially affected area. As attached you can see the flooding after only a few minutes of rain, with added stress to these roads this will only get worse and cause significant problems.

3. Access: Access to the site is limited, relying solely on Hall Lane, with access from other roads being unrealistic. There is presently not a natural access point from Hall Lane for pedestrians as the site is rural/ semi-rural in nature.

4. Traffic: Road access from Hall Lane could create material issues of congestion for vehicles, affecting not only the occupiers of any properties that would be constructed but also existing users of the route. Myself and my children walk along Hall Lane/ Gorleston Road areas regularly with our dog and it is simply dangerous, this area simply cannot take any more traffic. We have the 20mph zone with tiny pathways which at times I myself have nearly been knocked off my bike or forced to enter the gardens along the pathway to escape the traffic. In simple terms any further traffic along this area is putting people’s lives at risk, the drivers do not stick to the 20 limit and one day there will be a fatality here.

5. Services: there are insufficient services available to accommodate a
significant number of new residents, particularly with nearby medical facilities having closed, or already coming under considerable strain. The struggle to get appointments at my local surgery which is Bridge Road Surgery is proving more and more difficult, with more people entering the area this will become impossible and people will be forced to use other services such as A&E which will further drain these resources.

6. Other unique features: The site features a protected building on the corner of Hall Lane, an unmarked graveyard is understood to exist in the far north-west corner, a historic pillbox is present on the land, please see picture attached and a pond also exists, all of which would come under some form of threat from development of the site. The area has a unique history with regards to the work house and the graveyards, we are often finding old coins when gardening. There is so much history here.

I consider any of these reasons to give cause not to include this site in the Local Plan following the closure of the consultation phase.

In addition, the above concerns seem equally or more material than the reasons provided for rejecting other sites in the consultation document, for example the number of sites which have been discounted on the grounds of a single identified factor such as the presence of a nearby listed building, limited access, a loss of trees, impact on the local landscape, or extension of the built-up area. As such I consider that the proposal for including this site is not proportionate or justified relative to the other sites available in the Local Plan and should not be included in the final proposal.

Lastly on a more personal note I feel that we need some green land to live a healthy, lasting life. This is why we brought this house as I feel having this space improves health and mental wellbeing. We also feel that it will have a massive effect on the value of all properties within the areas and will completely destroy the feeling of living in a village it will simply turn into a town.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/134852/ МоOv/-%208695253%20IMG6636MOV.MOV


David Henwood

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 524

Comment 2.85 of the Waveney local plan states that this development will have good access to the existing facilities in Oulton and the employment area of Mobbs way, can you please explain where the jobs are to accommodate the extra approx 600-800 people that will live in these proposed houses, assuming they are of a working age, or are these houses being built to accommodate retired people, Employment wise Lowestoft and the surrounding area is in decline and has been for some time, there are no such jobs or likely to be for these people.

It also mentions the proposed Medical centre in the development, I understand the local Medical centres have already turned down the running of this proposed new centre saying they could not foresee getting enough staff to run this centre, due to the shortage of Doctors and Nurses already in this area, so to say this housing development will be adequately covered by this Medical centre or any other local centre is completely inaccurate.

I would also like to make known my objection to any access to Union lane {Policy WLP2.14} whether it be a cycle lane or pedestrian walkway, this lane is extremely narrow and has no paths or pedestrian walkways, the existing daily constant traffic going up and down would make it very dangerous to have any extra pedestrians and cyclists using the Lane, I do not see any need for this access considering that any proposed houses facing Union lane from this development will ultimately be the rear of the houses and will have existing hedges facing Union Lane that do not need to be removed just to gain a pedestrian access, all the internal roads that feed these houses will lead out to Hall Lane / Somerleyton road anyway, and this should be the only consideration for entry and exit of this housing development should it get approval.

I would also like to ask if this proposed development is still at the consideration stage, I understand from a local builder that it has already gone to London for approval, and I would like for someone to confirm or
deny this is indeed the case please.

Attached documents
Diane Capps-Jenner

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 692

Comment Proposed Construction of 340 New Homes between Hall Lane & Union Lane, Oulton Village WLP2.14

With a view to the above, I would very grateful for your review, and ultimate reconsideration regarding the location of the proposed 340 new homes, for the reasons outlined within this letter. My late husband and I have lived in Hall Lane since 1977, opposite to one of the fields currently under consideration for the new builds - and therefore feel I have good knowledge of both Hall Lane and Oulton Village. As such, I am able to give a well balanced and objective view with regard to this. Please see below;

Roads surrounding the Proposed Construction

Hall Lane is already a very dangerous lane/road. There are several bends within close vicinity of one another, and bearing in mind the main entrance/exit of this new estate is onto Hall Lane solely, the thought of all the vehicles from this estate entering and exiting onto the Lane is simply appalling, and more so very unsafe and hazardous. When one considers that if this estate is home to 340 new families, with potentially 1, maybe 2 cars per household, it would be a fair approximation that approximately 500 cars could be exiting this estate, onto Hall Lane on a daily basis.

Not only the above must be considered, but also the new homes which are currently being built within the Wood Meadow project, which we are led to believe may be between 800, and 900 homes. Again, a main exit of this estate is to be located further along Hall Lane. Apologies for repetition, but bearing in mind the above, we can assume this estate alone will produce in excess of 1000 cars. Although I appreciate this number of cars will not exit the Wood Meadow estate onto Hall Lane alone, we can be sure a high proportion of these cars will (especially those travelling towards Gorleston/North of Oulton to work, or Tesco, the nearest Supermarket. Also very likely those travelling into Lowestoft too, as this would be the
nearest exit to Somerleyton Road/Millenium Way etc - the main/closest thoroughfare to the Main Roads, bypass and proposed third crossing).

Another development which is under construction is that at the Blundeston Prison site. This area was brought by a local Developer, Mr Stephen George, Managing Director of Badger Building in 2013. This 24 acre site was sold to the Badger Building for a “mixed use development” for business, leisure, and community purposes, as well as homes. I understand proposed number of homes is 140, but no doubt by the time this development is complete the number will be higher. Again, please note, one of the main roads to and from Blundeston is again Hall Lane – therefore traffic from this proposed estate must also be seriously considered in the long term.

Hall Lane is also used as an alternative route to the A47, for traffic travelling through to Norwich via St Olaves, Hales etc, and can be very busy as a result of not only this, but also a "rat run" for traffic travelling via the country roads from Gorleston/Gt Yarmouth and surrounding areas. Often traffic speeds along the initial section of the road (from Gorleston Road down to the first bend, approximately a 300 – 400 yard length) – and being a resident for as long as I have this is a common problem, and accidents have occurred as a result of this. Weekends especially, the Lane is used frequently by horse riders, and cyclists – already this is a hazard, let alone the introduction of any further traffic. Previous Parish Council Meetings have discussed the issue of speeding vehicles along Hall Lane, thus already being a proven, recognised point. It can already be difficult leaving your property at the busiest times of the day without taking into account the proposed traffic from both the Woods Meadow, this current proposal, and the Blundeston Prison new builds.

In addition there is a very small round about at the top of Hall Lane, joining Gorleston Road. Due to the tiny circumference of this roundabout, is only just able to manage the current level of traffic travelling through the Village. Using this road/junction on a regular basis, I have witnessed many dangerous risks taken over the years – any additional traffic/users will only increase this risk.

Drainage and Sewerage

The current residents of Hall Lane have septic tanks servicing the properties. The drainage in the immediate vicinity is already poor, and water table high – proven by the frequently waterlogged field opposite to my home, and the drainage ditches which are also often filled to capacity. Surely this again would be severely compromised by any further demand?
One would assume that with 340 dwellings, the overall number of residents could be as high as 1000 to 1500 individuals, if not more – this would equate to a substantial amount of water usage, drainage and sewerage. Recent articles in national newspapers outline the dangers of the rush to build new homes, which will increase flooding by overwhelming drains. This has already happened in other areas of England in recent years, where new housing estates have been built in inappropriate locations, and caused much devastation and expense to all concerned.

Wildlife & Areas of Archaeological Interest

As I have lived in the area for such a long time, over the years I have witnessed the many animals which live alongside us in Oulton Village. I have frequently seen Foxes, Muntjac Deer, Bats, Barn Owls, Hedgehogs, Pheasants, Woodpeckers, Snakes and numerous other creatures in my garden. All of these reside and come from the direction of the field opposite and the surrounding trees and woodland. There are also various ponds around the perimeter of the fields mentioned, no doubt home to newts and other endangered species. Surely consideration should be given to these animals?

There is also an historic, Grade II listed Manor House at the corner of Hall Lane/Oulton Street – and there is a possibility the immediate area surrounding this building could be investigated archaeologically in the near future – surely any development would heed these plans? Part of the development nearer to Union Lane also overlaps the site of a former hospital and workhouse, and the burial ground of a large number of people. Would this be correct to disturb such a site?

Oulton Village & Oulton Parish Council

In only 2013, local residents fought this same battle. At that time, the aforementioned

Mr Stephen George/Badger Building, made an application to build on the field opposite to my house. Objections were put forward, the application at that time declined, and suggestions made to encourage the local Parish Council to put into place various projects to protect the Village status, in an attempt to prevent any further applications. Since that time Oulton Parish Council and its devoted members and residents have worked tirelessly to do just that. However now, it is very, very sad that a bigger development with potentially a far more devastating impact, is now thrust upon us. I’m afraid to say, this current "Monster" would appear bigger and more furious
than the last!

Our Village is just that – and treasured by those who live here. Although these fields have been released by the council as potential building land, it was previously green field land. I understand other areas of brown field land are within close vicinity – and yet remains unused – would this not be a better area to consider for such a project?

Suggestions and Proposal for Consideration

I am sure you will already be aware from the content of this letter, I am truly passionate about the area in which I live. Although I realise there is a need to plan for new homes over the coming years, as outlined in the Summary of the Waveney First Draft Local Plan, I sincerely hope my letter can be given the due care, attention and consideration it deserves.

I genuinely hope these plans are reconsidered, and some of the points I have raised be given the attention they deserve. At the very least, please allow a reasonable amount of time to pass once the Woods Meadow estate is fully completed, with all the dwellings full - and at that point assess, audit and reinvestigate the impact this alone has had on Hall Lane and surrounding land. (Not only from the vehicular aspect, but also pressure on the physical land itself - ie flooding/drainage etc).

When looking at current new build estates within the Lowestoft Area, these seem to be located, very sensibly, near to a newly built access/main road fir for purpose (for example Bentley Drive leading to Millenium Way from the Persimmon/Badger estates near to Tesco, Gunton and likewise Castleton Avenue, leading to Beccles Road from the new Carlton Colville estates). No such road will exit from the Wood Meadows Estate and this new proposal – surely this reflects the enormity of two such vast estates exiting onto Hall Lane.

PLEASE DO NOT RUSH THESE PLANS FOR APPROVAL, AND THUS SUBSEQUENT BUILDING OF THESE PROPERTIES, JUST TO PLEASE SHORT TERM TARGETS.

Attached documents
Environment Agency

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
865

Comment  
We would support the retention of natural features including trees and hedgerows in the layout of any future development at the site.

Attached documents
Hickey

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
61

Comment  
This comment concerns site WLP2.14. This site has already met with strong opposition twice before. There are already problems with traffic at the roundabout now and the road and services won't take 200 more houses without major problems. There's also the human cost, no one wants to buy a property in a rural location and one day wake to find they're looking at another village outside their window where once were fields and trees, this is also to the detriment of wildlife, it lives there in the trees and ground and can't live there in concrete and bricks, we hear all the time about wildlife decline and it's down to selfish greedy developers building houses where they want to just to make money.

Attached documents
Historic England (as English Heritage) commented on a planning application to build 57 houses on this site in 2013 recommending refusal (application number DC/13/2901/FUL). The proposed allocation in the Local Plan is for 200 dwellings with 1 hectare of land being left as open space along the frontage of the site on Hall Lane, adjacent to the grade II* listed Manor House as part of the mitigation of the impact on the setting of the Manor House. For the reasons set out below, we find that the proposed allocation would have a negative impact on the setting of the House and would result in harm to its significance, therefore we find the allocation unsound.

The Manor House originated in the late 16th century as a building of some status and sophistication. It still contains carved timbers and molded plaster dating from the 1590s. The house has seen multiple phases of development since the 16th century, particularly in the late 19th century when it was extended on the eastern side so as to completely change its appearance. However, on the western side, which faces towards the proposed allocation, it is still recognizable as a building of the 16th century. This makes the house’s setting on this side of particular importance.

The house would originally have been set in an agricultural context and in substantial grounds benefiting its importance and that of its owners. It is likely that fairly formal planting would have been laid out close to the house on its southern and western sides with fields beyond. While Oulton village has expanded to encompass the wider setting of the Manor on its east and southern sides, the north side of Hall Lane has not been developed (apart from a single modest bungalow). To its north modern housing has only been developed a single plot deep on Oulton Street. This means that beyond the rear (western) boundary of the Manor House’s garden open fields can still be seen.

Despite all the changes to the Manor and its surroundings over several hundred years this part of its setting still makes an important contribution to the significance of the house by echoing its original context and
emphasizing its place in a predominantly rural landscape, economy and society from which its owners, builders and materials would have come.

The proposed allocation would fill the field to the west of the Manor House with modern housing and remove its present character as open green space. To achieve the proposed number of dwellings per hectare it is likely that this new housing would also be laid out to allow vehicular access in a way that does not reflect traditional forms of building, although we note the requirement in the policy that the buildings fronting onto the 'open space' on Hall Lane would be detached and spaced as existing buildings to the south of Hall Lane. This existing modern development on the south side of Hall Lane is itself inappropriate in the setting of the grade II* listed Manor House as it has removed part of the House's agricultural setting. Therefore, this kind of development is less appropriate in closer proximity to the Manor House. The proposed allocation would not only remove the agricultural quality of the site but would be visible from the Manor and obscure views of it.

We also would note that whilst the supporting text does make some consideration of the grade II* listed Manor House, other heritage assets that would potentially be affected by such a development have not been identified and assessed and the policy does not make reference to any heritage assets. We have not seen evidence of a heritage impact assessment setting out the whether or not any development is possible, what the effects would be of development on designated heritage assets and their settings and, if development were possible, what mitigation measures and quantum of development would be appropriate given the detailed information about the site. We would expect such an assessment to determine whether an allocation should be taken forward or not and, if so, that its findings are incorporated in the policy and supporting text. In the absence of such an assessment, we do not believe that the evidence is there to justify the inclusion of this site allocation.

Attached documents
Joanna Barber

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 846

Comment We live on Oulton Steet, 2 houses down from the Manor House and would be extremely concerned that the large trees that are in view from the rear of our house (facing west) would be cut down, not only are these trees pleasing to the eye, also provide us with privacy to the the rear of our property.

We would also have a concern over the wildlife that is likely to be forced away from this land and the potential of rats and mice migrating closer to our properties. We have recently moved from Chiltern Crescent in Oulton and as the development of the Woods Mewdow development progressed we definitely saw an increase of rats and mice coming off the land and nesting in ours and our neighbours gardens.

Attached documents
Lee Mason and Alison Lund

Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 40

Comment
Dear Sir/Madam

I am utterly horrified to find this proposal in this new plan.

The area between Hall Lane and Union Lane is rural land and is currently outside the area for permitted development and the defined physical limits of Lowestoft for very good reason. Only recently an application to build on part of this land was soundly rejected and for very good reasons which are on record.

This area should not be built on, either now or in the future, and I object utterly and without reservation. Should this proposal go ahead, you may be assured of my implacable and determined opposition and that of my neighbours.

I beg you to reconsider immediately.

Regards

Lee Aaron Mason

Alison Lund
Lee Mason and Alison Lund

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 791

Comment Having spent some time examining the proposals set forward in the Draft Local Plan, we would like to comment on the areas designated WLP 2.14 (land between Hall Lane and Union lane, Oulton) and WLP 2.13 (land north of Union Lane, Oulton) and explain in detail why we would like to suggest that this area is unsuitable for the proposed development. While we are mindful of the housing need in Waveney, and the pressure from central Government to meet specific targets in this respect, it seems clear to us that development of this land is extremely problematic and should be set aside. We understand that there is sufficient leeway within the current draft proposals for these sites to be excluded without compromising the requirement for new homes mandated by Central Government.

Policy CS04 requires that any development consider the infrastructure requirements needed to support and service any proposed development. The most pressing reason for rejecting the two proposed sites is undoubtedly the severe problems any such developments would cause in respect of local road traffic infrastructure. Neither of the proposed sites can be adequately accommodated within the existing road system nor is there any reasonable prospect that the system could be improved to make them possible.

The proposal to build a further 200 houses on the land between Union Lane and Hall Lane will create an even greater strain on the existing infrastructure. It is proposed that this development would access the road network via Hall Lane. This would be in addition to the forthcoming access road from the Woods Meadow development of some 800 houses which will also enter the road network via Hall Lane.

Hall Lane is, as the name suggests, a winding semi-rural lane with a couple of sharp bends with limited visibility. It is also the main access road for Norwich for residents of Oulton Village and northern Lowestoft who typically use this route in preference to either travelling to Yarmouth via the congestion at the Gapton Hall roundabout or travelling to the A146 via the...
even worse congestion at the level crossing at Oulton Broad North station and the bridge at Mutford Lock. With the traffic associated with a further 800 homes already planned to join this road, to add that from a proposed further 200 houses to the north seems a recipe for chaos.

Traffic entering Hall Lane will either be travelling towards Lowestoft, where it will encounter the roundabout by High House, or towards Somerleyton and Norwich, where it will have to negotiate a narrow 90 degree turn before joining a winding rural road ill suited to the level of traffic generated. In addition to the traffic generated by the 800 houses already scheduled to join Hall Lane, traffic from the new development headed towards Norwich down the rural road would either meet or join traffic from the proposed development of 150+ new houses on the former site of Blundeston Prison, causing further congestion on unsuitable rural lanes and indeed at Hall Lane when that traffic reaches Lowestoft.

It is apparent that the existing road of Hall Lane is woefully inadequate to carry even the extra traffic currently allocated to it. To add 400 or so more vehicles from WLP 2.14 in addition to this will inevitably cause problems on the blind bends on Hall Lane and in particular, congestion at the roundabout where Hall Lane meets Oulton Street.

Traffic from Woods Meadow, Blundeston Prison and WLP 2.14 would be meeting traffic coming from the left from Union Lane, WLP 2.13 and indeed the Lowestoft Garden Village, all of which would then be either travelling down the already very congested Gorleston Road, which is already subject to repeated long tailbacks throughout the day (where it would in turn meet heavy goods traffic from the proposed expansion of Mobbs Way) or travelling along the very narrow cut-through at Somerleyton Road to finally join Millennium Way at the traffic lights, which would form another likely pinch point as traffic typically backs up at this point regularly even now.

In summary, the existing traffic infrastructure of Oulton Village was designed for semi-rural usage which has long since been surpassed. There are serious pinch points where traffic from existing and proposed housing joins Parkhill, on Oulton Street where the 20mph speed limit and crossing are located at a very narrow stretch of road, at the roundabout on the junction of Hall Lane and Oulton Street, on Hall Lane itself, at the traffic lights on Somerleyton Road and further down Gorleston Road. Existing plans are already likely to stretch this system beyond capacity as traffic from the 800 new homes at Woods Meadow and a further 150+ at Blundeston Prison enters the system and to add traffic from a further 340 homes on WLP 2.13 and 2.14 (as well as from the North Lowestoft Garden
Village) would be dangerous to pedestrians and cyclists and result in much of this area existing in a state of gridlock for large periods of the day.

The Future of Oulton Village

Policy CS02 requires any proposed development to "reflect local character and distinctiveness" and to "protect historic character".

At present, the area northwards of the junction between Oulton Street and Hall Lane where the manor of High House stands is one of the few remaining places where Oulton Village retains its separate identity. Approached from the south, as it mostly is at present, there is a noticeable change in the character of the area as you pass the roundabout, with housing on both sides replaced by mature trees along the frontage of High House and the playing fields next to Oulton Community Centre. Most of the visible buildings are older, notably the Blue Boar Pub and the terrace on Oulton Street before you exit the urban area after Union Lane.

This type of gradual shading between the rural and the urban is even more pronounced along Hall Lane. Entering Oulton Village from the direction of Blundeston, a narrow rural road makes a 90 degree bend followed by a few scattered houses on the left before you come to pasture and fields up to the roundabout. This transitional zone between the rural and the urban is perhaps the last remnant of the separate and distinct identity of Oulton Village itself before you enter what is effectively a Lowestoft conurbation. It is the area of the Community Centre, the playing fields and even the Village Sign that proclaim the Village's existence as a distinct entity.

This transitional zone, so vital to the future of Oulton Village, is already under some threat from the construction of the Woods Meadow site and its proposed access for 800 new homes onto Hall Lane but the construction of new housing on WLP 2.14 would make a massive change to the appearance and character of the area. It is clear that the present liminal zone will be replaced by an abrupt transition in both directions from rural to urban that will destroy the individual character of Oulton Village itself and effectively submerge any last vestiges of its separate identity in a sea of monotonous housing, much has already tragically happened to Carlton Colville.

Further to the loss of the distinctive visual aspect to Oulton Village, there is also the question of whether the number of new homes planned and proposed in the area would lead to the village having a population that would essentially qualify it as a town rather than a village, necessitating the formation of a Town Council and the attendant costs and bureaucracy that
would ensue. This would of course result in the formal as well as the actual end of Oulton Village as such.

Water Supply and Drainage

Policy CS03 requires that proposals for development in Waveney respect the environment of the District, have adequate drainage systems in place and not increase the risk of flooding locally.

Hall Lane does not currently have a mains sewer and Union Lane is connected to a privately-owned sewerage system. There is therefore no existing sewerage system for the proposed dwellings to be connected to in the immediate vicinity. This would require extensive works to rectify causing widespread disruption and seems likely to involve works which would further compromise the natural features of the area and the archaeology, as detailed below.

WLP 2.14 is currently used for pasture and growing hay. This is in part a recognition of the fact that for much of the year, it is not possible to use heavy machinery on the site as it is frequently waterlogged and boggy for extended periods of time. There is a drainage ditch that runs behind the last houses on the left in Union Lane and then parallel with the Lane itself that serves the surface water drains on Red House Close and helps keep the field as dry as possible which is constantly flowing with water when properly maintained and of course there are ponds and water meadows at the lower end of the site.

The construction of 200 houses on this site would undoubtedly have a severe impact on the drainage of this already saturated site, in particular the amount of surface run off would increase enormously. All this displaced water would have to go somewhere and it is hard to see how this could be achieved without displaced water spreading out into Union Lane and Hall Lane, especially at the lower end and particularly if the existing drainage ditches are compromised.

More worryingly, that water would further lead to further saturation of the edges of the construction and the probability of subsidence. This land is at the edges of Oulton Marshes and while it does not currently pose a flood risk, this partially because the land currently absorbs much of the water from the surrounding area which it will no longer be able to do if construction goes ahead.

Archaeology and History
Policy DM30 requires that any proposed development preserves or enhances the architectural or historic interest, including the setting, of Listed Buildings. WLP 2.14 adjoins the Grade II* Listed building known as High House. Dating from about 1550, High House is essentially the nucleus around which this part of Oulton developed historically and Suffolk County Archaeology considers it extremely likely that the land adjoining it was historically part of its immediate curtilage and thus important evidence of Mediaeval settlement in Oulton and the area lies beneath it.

Construction on this site would irrevocably damage this archaeology and render whatever survives permanently inaccessible.

The proposal to leave a small space between High House and the proposed development does not in any way address the fact that any such construction would cause significant harm to the setting of this important part of our heritage by eroding the open aspect to the west of the house. This section is its original 16* century portion, making the maintenance of this setting especially important. Planning does not normally regard the preservation a view as a significant impediment, but here, the view from the principal rooms through the tree line is of exceptional significance.

This is a significant historic house in a rural, agricultural setting at the edge of an established village and to surround it with a modern estate would be to degrade the house within its established setting and alter the character of the surrounding area inappropriately.

There is also a Type 42 Second World War pillbox situated on the site immediately adjacent to the Blue Boar pub. This is an important part of our 20th century history and both the structure and its setting must be preserved to ensure that the sacrifices the men who would have manned these positions in case of an invasion (my late Great Uncle among them) are remembered and honoured.

Wildlife and Environment

Policy CS16 requires the District Council to protect and enhance the natural and historic environment in the District.

WLP 2.14 is within Landscape Character Zone HI, which aims to conserve and enhance the landscape structure and landscape pattern created by the hedgerow network. The site is characterised by a series of very well established hedgerows containing mature trees which border Hall Lane and Union Lane as well as a hedgerow dividing the equestrian pasture at the southern part of the site from the hay field at the north. There is a more
densely wooded section adjacent to High House.

These hedgerows are not only extremely important both historically and environmentally, but they also tie in to the character of this part of Oulton Village, with mature trees extending to the east of High House and along both sides of Oulton Street, especially where it opens up eastwards into the playing fields.

WLP2.14 is currently exceptionally rich in wildlife, including an established rookery, deer, heron, foxes, rabbits and other mammals. Of especial note, however, are the presence of two protected species, bats and barn owls. These are by no means occasional visitors, as previous developers attempting to get planning permission for this site have suggested, but a regular and established presence found daily on the site, especially in the Spring and Summer. The current usage as pasture and as a hay field has encouraged this diversity of mammal and avian species which the proposed development would destroy.

The pond and marshy areas to the west of the site have always had healthy amphibian populations and this would suggest a strong possibility of the existence of newts, which are also a protected species.

Conclusion

As stated above, we are well aware of the pressure from central Government to build large numbers of new homes in Waveney. Whatever the arguments for and against that proposition, we have endeavoured to explain why we feel that the reasons for the historical refusal of permission to build on the sites now designated WLP 2.13 and WLP2.14 over the past 30 years remain valid and should be upheld in future. If such a proposal is accepted, we feel that it will not only bring traffic chaos and frequent gridlock to this part of Oulton but that an important part of the village's historical, social and natural character will be irrevocably lost for the sake of what is a very small part in a very large programme. We urge that these sites (and especially 2.14) be dropped from the final version of the local plan.

Attached documents
Mandy Green

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 1193

Comment With reference to the above consultation I wish to object to the inclusion of the three areas (above) covering the Parish of Oulton where I live.

I have two arguments as to why the proposals should not be within the local plan.

Firstly we already have Woods Meadow with in excess of 800 homes currently being built and without finding out first how this huge development will impact on Oulton I cannot understand how you can agree to an extra 340. I do understand the need for building of new homes but in a measured way which will gradually have the necessary infrastructure improvements being added and that brings me on to my second reason, that of the recent questionnaire that I was asked to complete which is helping to develop plans for the future of Oulton covering housing, services, recreation, and our open countryside amongst other issues. What is the point of asking us on the one hand for our views as to how we see the future of our village whilst telling us that you are allocating more land for housing in Oulton?

Surely it would common sense to allow the process of the Neighbourhood Plan to be completed and then use that plan to highlight areas that the community want to see developed along with the other issues contained within the Neighbourhood Plan Questionnaire.

If you proceed with your proposals as contained within your consultation I cannot see any benefit from continuing with a Neighbourhood Plan.

Attached documents
Mark Cubitt

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 764

Comment In regard to the 340 new houses proposed behind Union Lane in Oulton.

I was shocked and disappointed to find out the proposal of these in houses within Oulton. I am left wondering has anyone who is responsible for these decisions actually visited the proposed area? I am a teacher at the local High School within a five minute walk of this beautiful Green Belt land where I regularly walk and watch barn owls hunt and dear graze after work.

My main concern is for the safety of my pupils. I have witnessed many near misses due to drivers not paying attention, speeding through Oulton Road which is supposedly a 20mph road and you are taking your life into your own hands on the zebra crossing as the majority of the drivers speed up instead of stopping to let you cross as 30 meters up the road it is the national speed limit.

With the additional houses already being built behind Sands land with no new School being built, a doctors surgery already empty in Oulton since its closure a couple of years ago where are all these new people going to go?

I find it a farcical that planning permission was thrown out by the council last year for developing on this land which has ancient hedgerows by a local developer but now when the council wants to build on the site it is suddenly it is ok.

Attached documents
Matt Smith

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 106

Comment

Afternoon, in point 2.85 of your first draft plan you state 'The site has good access to existing services and facilities in Oulton' with medical centre being mentioned, can you confirm where this local medical centre is?

If this relates to either Crestview or Bridge Road Medical centres is there a plan to help support these as it's already hard enough to get appointments, and parking for Bridge Road is extremely limited.

Attached documents
Mervyn Wooltorton

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 1282

Comment  
In particular the new Waveney plan now includes a development of land within Hall Lane for circa 200 new dwellings. A site which has previously been denied planning consent, on numerous occasions, for a raft of valid planning reasons as well as the significant objections from the residents and Parish Council along with the Heritage groups in relation to the important listed Manor House which would be totally enclosed should the proposal be agreed. The most recent application for 54 dwellings was rejected so how can it now, some three years later, be permissible for a development of 200 dwellings. It is of note that the Western boundary now includes additional land owned by the same developer; clearly one wonders how this was decided.

The developer stated in a previous application that the Western boundary coincided with, in their opinion, the natural geographical boundary for development, why then is this no longer the case?

For the purpose of this Local Plan consultation I include below my previous objections to the Hall Lane development as much of my objections to the previous planning application are even more relevant now with a proposed increase in homes from the 54 then to 200 now.

Quote
I have reviewed the application made by Badger Building (E. Anglia) Limited ("Badger") and believe that it is fundamentally flawed.

Policy Points
It is of central importance and a matter of fact that the application contravenes a number of policies, which apply, some of which I have identified below for emphasis although I’m sure there are more. You will already be well aware of these so I will not labour each point.

Waveney District Council's ("WDC") own policies for development do not
include the property as a site considered for development. The Statement of a 5-year supply of housing land as at March 2012 was published in October 2012 and later supported by a viability study and clearly identifies sufficient land to deliver housing to satisfy the National Planning Policy Framework.

Badger purport to make something of the inspector’s acceptance of evidence relating to land supply in an appeal on a site they refer to as "Applewood". I believe that this decision has been superseded by Waveney District Council’s plan and viability study and, that being the case, I cannot see how this earlier decision would have any bearing on the Application.

The Property is outside the physical limits set out by the East of England Plan (2008). As such it would seem to me that sites within those limits should be preferred for development.

WDC's stated policy is to develop in a way which is sympathetic to a site and its surroundings. The character of Hall Lane in the locality of the property is low density rural housing. To the south of Hall Lane opposite the property is a row of detached dwellings set back from the road and well separated. The proposed development per the application is high density and would fundamentally detract from the existing character of the area.

The type and mix of housing proposed on the property is a cause for concern. With the recent approval of the "Woods Meadow" development I believe that there will be a substantial supply of similar properties in Oulton and I question whether there will be demand for these properties and whether the Housing Market Assessment has been taken into account.

The application sets out plans for some particularly unremarkable properties lacking architectural and/or design merit. Government planning guidance states that poor design should be rejected.

The Application

Planning Statement

As stated above, in the application Badger assert that WDC have not demonstrated a five-year supply of deliverable housing sites in line with the National Planning Policy Framework ("NPPF"). In October 2012, after the "Applewood" decision cited by Badger, WDC published their statement of a 5-year supply of housing land and subsequently published a viability study. Further, the "Woods Meadow" development on Hall Lane is accelerating with the s.106 agreement having recently been signed. I believe that WDC’s
5 year plan is demonstrably deliverable and satisfies the NPPF.

Badger cite a handful of relevant policies but other policies are missing from the list some which I have referred to in my comments above, for example:

- **DM01** – Physical Limits: the property is beyond the limit of the development area.

- **DM02** – Design Principles: developments should be "sympathetic to the site and its surroundings" and "enhance the identity and character of the site, contribute towards the distinctiveness of the local area, the quality of the built environment and the surrounding landscape"

- **DM16** – Housing Density: efficient use of land is to be promoted provided that a development "makes best use of the site in a manner that protects or enhances the distinctiveness and character of the area and takes into account the physical environment of the site and its surroundings"

It seems likely that these were not referenced by Badger in the application as in doing so they would inevitably undermine their own cause.

The CIL is mentioned together with the figure of £200,000. I cannot see the relevance of this financial incentive to what is a planning matter which ought to be decided on planning grounds only.

In the closing remarks of the planning statement Badger couple some seemingly incorrect assertions about the supply of housing land with a statement that Badger will seek a costs award against WDC if any appeal is necessary. This seems to me to be a statement of the obvious and a rather aggressive line to take at this stage. I hope that WDC are not intimidated by this argument and remain confident in their decision making on planning grounds.

Design and access statement

Badger again reference the "Applewood" case, see my comments on this above on this policy point.

The design advanced by the application is neither in keeping with the existing character nor linked to traditional local designs.

Further Observations

While I believe that the application should be rejected purely on planning policy grounds even if it were to be allowable I believe that the application
should be rejected for the following reasons.

The land surrounding the property is susceptible to flooding. Hall Lane itself frequently floods and I have had to carry out works on my own property to improve drainage. I hope that the planning process will involve a thorough review of the drainage of the site to ensure that flooding in the area is not made worse.

Hall Lane is a busy 'B' road and the roundabout at the eastern end of Hall Lane is a congestion pinch point. With the approval of the Woods Meadow development and the addition of the cars that will accompany those 800 or so new homes this will only be made worse by adding upwards of 100 more cars from the proposed development. Traffic accessing and leaving the property in such close proximity to the roundabout will compound the problems further. The application contains no information about any proposed improvements to the highways infrastructure to counter this.

Local infrastructure and services, such as schools and doctors that are already under significant pressure will have that pressure increased by this proposed development. Further development beyond planning policy should not be allowed while this situation remains to be addressed.

The ecology report is very light touch. The survey period was extremely limited and should be expanded in order to properly assess breeding patterns of protected species. This cannot be done adequately by only considering a single day in each of August and September. The comment about the water level in the pond exemplifies this as the pond now has water in it. The environment of the property is suitable for breeding of birds and amphibians (among other species) and as such a detailed survey should be carried out on the accepted precautionary basis. The report also states that "mitigation is not strictly necessary". Mitigation is either necessary or not and I question how the report has come to this confused conclusion.

UNQUOTE

Whilst I acknowledge and understand the need for additional housing and do not doubt there could be areas within Oulton Village that may be acceptable for housing etc but surely priority for development should be on brown field sites and in line with the wishes of the residents whose comments have been sought via the development of the Oulton Neighbourhood plan and in line with the National Planning Policy Framework ("NPPF").

DM16 of the NPPF states:— Housing Density: efficient use of land is to be
promoted provided that a development "makes best use of the site in a manner that protects or enhances the distinctiveness and character of the area and takes into account the physical environment of the site and its surroundings"

My final concern with regard to the Local Plan consultation is that it appears different rules have been applied in other areas of Waveney, therefore it calls into question the legitimacy of the document and I provide some examples.

Policy WLP2.14 – Land Between Hall Lane and Union Lane, Oulton

Land between Hall Lane and Union Lane, Oulton (8.69 hectares) as identified on the Policies Map is allocated for a residential development of 200 dwellings.

The site should be developed in accordance with the following site specific criteria:

The site will be developed at a density of approximately 30 dwellings per hectare.

Vehicular access should be off Hall Lane. An additional pedestrian and cycle access should be provided on to Hall Lane at the east of the site. A pedestrian and cycle access should be provided on to Union Lane.

By comparison the proposed development areas within Blundeston:

WLP7.3 & WLP7.4, are approximately 1 mile away from WLP2.14 yet the density is 18 and 22 dwellings per hectare respectively. It also calls into question why have you not accepted that the ongoing development at Woods Meadow, in the Village of Oulton, with over 800 new homes being built is not regarded as a significant development in the same way as just 140 new homes being built at the site of the Blundeston prison where it states at WLP7.4:-

7.19 During the first half of the plan period the redevelopment of the former Blundeston Prison site will deliver a significant amount of new housing in the village to meet local needs as well as a pre-school, retail and employment units. The strategy for Blundeston is therefore to allocate a small amount of additional development to be delivered only once the Blundeston Prison development is complete in order to enable the community to accommodate this growth and reduce the potential impact on the character of the village.
Do you not think that the community in Oulton would like to see how over 800 new homes is going to impact on the character of their village prior to having another 340 homes being agreed? It is clear that there are different criteria being used within the plan and unfortunately it appears that Oulton is again getting the worst deal of all.

Of a similar size to Oulton is Kessingland where they have completed their Neighbourhood Plan and WDC planners have accepted the proposals contained within Kessingland's plan in that they have allowed for 'significant levels of housing' and it is 'not considered necessary to allocate further development' yet they have allowed for 105 new homes as opposed to, in your view, our clearly insignificant amount of 340 on top of the 800.

I therefore request that the areas covered by WLP2.14, WLP2.13 and WLP2.17 contained in the Local Plan consultation document be taken out and allow the completion of the Neighbourhood Plan which allows the residents of Oulton to have a say in how they see their community develop without being shackled by pre determined proposals for developments in Oulton.

Attached documents
Moore

Section  Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  842

Comment  I object to the proposed inclusion of "Land Between Hall Lane and Union Lane" in the new Local Plan on the following grounds:

1. Wildlife: I have witnessed first hand the breadth of wildlife relying on this site: this includes populations of bats, owls, deer and foxes. The bats and owls in particular could be materially impacted by development.

2. Flood risk: The site provides for absorption of rain water and water from water sources at nearby Flixton; development could cause a significant risk to new properties, and to existing sites in the nearby/ potentially affected area.

3. Access: Access to the site is limited, relying solely on Hall Lane, with access from other roads being unrealistic. There is presently not a natural access point from Hall Lane for pedestrians as the site is rural/ semi-rural in nature.

4. Traffic: Road access from Hall Lane could create material issues of congestion for vehicles, affecting not only the occupiers of any properties that would be constructed but also existing users of the route.

5. Services: there are insufficient services available to accommodate a significant number of new residents, particularly with nearby medical facilities having closed, or already coming under considerable strain.

6. Other unique features: The site features a protected building on the corner of Hall Lane, an unmarked graveyard is understood to exist in the far north-west corner, a historic pillbox is present on the land, and a pond also exists, all of which would come under some form of threat from development of the site.

I consider any of these reasons to give cause not to include this site in the Local Plan following the closure of the consultation phase.

In addition, the above concerns seem equally or more material than the
reasons provided for rejecting other sites in the consultation document, for example the number of sites which have been discounted on the grounds of a single identified factor such as the presence of a nearby listed building, limited access, a loss of trees, impact on the local landscape, or extension of the built-up area. As such I consider that the proposal for including this site is not proportionate or justified relative to the other sites available in the Local Plan and should not be included in the final proposal.

Attached documents
Spurgeon

Section  Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  823

Comment  Cannot believe they are building on this land! It's going to be so over crowded our beautiful country side. It's wildlife being affected....I really do not want this land to be destroyed. It’s an area with not enough facilities to support the mass build, it's such an attraction to deer and birds and this must be considered!!! Please do not build here!!!!

Attached documents
Watson

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
1040

Comment  
I am opposed to this planned development, and also do not feel that the necessary provisions have been taken to inform residents in the area.

Attached documents
Norman Castleton

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 385

Comment Land between Hall Lane & Union Lane.

Approx 261. This is green fields and should not be built on. Location at considerable distance from austerity level services and transport & other logistical links. Urban spread for speculative builders.

Attached documents
Oulton Parish Council Lynne Ward

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 1073

Comment Oulton Village has existed since the 1400s-1700 Years, the Village has a varied and interesting past, Hospital, Workhouse, Pill Box and is possible a good Archaeological site, in the north corner of WLP 2.14 a Burial site, which we feel should be investigated, returned to its original state to give respect to peoples loved ones, the Grade II* Listed Manor House the Green belt WLP 2.13 behind and to the west and north of it, also Green belt WLP 2.14 land to the north of the village is a cornerstone of our Oulton Village Rural Heritage, once this land is used for housing the village will no longer exist and will be at the target for it to no longer be a Village Parish Council but a Town council.

The proposed density of housing for WLP 2.13 Of 25 and WLP 2.14 30 Houses Per Hectare is too much and is not inkeeping with the density and type of housing already existing in the original Village, if carried forward it will destroy the original Village.

Attached documents
Richard Morling

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 815

Comment The access to this site, needs to be considered with the projected increase in traffic from the Woods Meadow development, until this is assessed no further should be taken on this site.

Attached documents
Roger and Karen Hillier

Section

Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID

889

Comment

We would like to formally object to the land surrounding Union Lane and specifically the land north of Union Lane. Please read my objections as listed below.

With this development the village would become so large as to not be a village anymore, just a continuation of Oulton Broad/Lowestoft.

The roads are already congested in this area and getting out of Union Lane onto the main road can be very difficult due to the volume of cars and also the speed of them. Twelve years ago I was involved in a head on collision while pulling out of Union Lane. A car was over taking heading into the village right on the junction. This could have been a lot worse for me and my young son, as the driver of the car involved was impatient with the car he was following into the village who was observing the speed limit. As a result of the impact all three cars were written off and the driver was convicted of dangerous driving.

Surrounding the proposed development are a lot of trees and hedges of various species, some of these are very old and need to be protected.

Having lived here a number of years we have enjoyed the nature that surrounds us in the proposed development. We have had visits from Deer, Foxes, Tawny Owls, a Barn Owl and a vast number of other birds, these would be seriously affected by any development.

We live in a house with small garden that would be seriously affected by these houses being built in this area as we would totally loose the privacy in our house and garden as they would be so close to our property.

Land water drainage has always been a problem for us as we have a drainage ditch adjoining our garden and this has at times over the years been very close to overflowing onto our property. At times there has been so much water for long periods of time that we have had ducks swimming in it. The soil in our garden gets very waterlogged during the winter so we
have to try and avoid walking on our grass. Building on this site will just make this situation even worse as there will be more water going into these ditches from the buildings rather than soaking into the land as it would have done. Having walked on the fields surrounding us I can tell you they get as waterlogged as our garden or worse.

The sewage system has also been of great concern from time to time due to the pipes running down the land towards the old hospital and then needing to be pumped by the old pumping station. We had so many problems that we invested in our own drainage rods!

The Old Hospital, now gone, was previously a Workhouse and I believe people who died while staying there were buried in the surrounding area so this needs accounting for and respected. There could also be areas of Archaeological interest in this area due to the lands previous uses.

Attached documents
Sharon Corbin  
Ingleton Wood LLP (Iain Hill)  

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton  

Comment ID  
976  

Comment  
Background  
On behalf of Sharon Corbin (owner of the above site), we strongly support the proposed allocation of the above site under Policy WLP2.14 for the residential development of approximately 200 dwellings. It is, however, requested that alterations are made to the proposed wording of the Policy to incorporate a degree of flexibility in terms of vehicular access in order to facilitate delivery of the site in a timely manner.

In terms of the proposed allocation, the site is considered to be entirely deliverable and capable of making a significant contribution towards satisfying the Council's housing needs during the period up to 2036. The site, in accordance with the National Planning Policy Framework (NPPF), represents a suitable location for development, is available immediately and is viable. These matters are addressed in further detail below.

Assessment of Deliverability  
Suitable  

The site is located immediately adjacent to the defined Settlement Boundary for Lowestoft under Policy WL2.14, which due to the availability of infrastructure, amenities and services is identified as the most sustainable location for development within the District. The site, therefore, clearly represents a sustainable location for residential development.

Due to the site's location immediately adjacent to the Settlement Boundary, the proposed allocation of the site represents an opportunity to accommodate residential development, for which there is a clear need, through a logical extension that will create a clear and defensible boundary to the settlement. The scale of development proposed is considered
appropriate to the location and can be accommodated without a significant extension of the built-up area.

The site also has potential to be developed with limited impact on the surrounding area. The site is not located in a sensitive landscape setting and, subject to appropriate design / landscaping measures, can be incorporated into the urban area. This is recognised at paragraph 2.85 of the First Draft Local Plan which states that the site would be unlikely to have an impact on the landscape of the surrounding area.

The proposed development of the site is not constrained by environmental or heritage assets. There are no such assets on site and whilst Workhouse Wood, a County Wildlife Site, is located 150 metres to the west of the site, it is considered that the site can be developed to ensure it would not have an adverse impact on the site.

Similarly, whilst there are two listed buildings within close proximity of this site (Manor House, Grade II* and Blue Boar, Grade II), sensitive development of the site, notably through the incorporation of buffer area to the south, will ensure that the heritage assets are not harmed by the proposed development.

The site is also suitable in terms of highways and accessibility. As detailed in First Draft Local Plan Policy WLP2.14, suitable vehicular access to the site can, in principle, be delivered via Hall Lane. However, as detailed below, it is considered that opportunities exist to provide an additional means of access to the north of the site and it is requested that this is recognised in the Policy. In addition, the site is located in close proximity to existing public transport infrastructure, notably bus routes and the National Cycle Route, and is, in accordance with First Draft Policy WLP8.21, capable of incorporating measures to encourage travel by non-car modes. It will also provide an opportunity to enhance existing infrastructure to the benefit of the local community.

Available

Whilst the site is within two separate ownerships, it is available for development immediately. It is envisaged that housing can, subject to the grant of planning permission, start being delivered on the site within 5 years.

Viability

Development of the site for residential purposes is considered viable, taking
into consideration the various policy requirements in relation to matters such as affordable housing provision and CIL contributions.

Proposed Amendments to Policy WLP2.14

It is requested that alterations are made to the draft Policy to provide flexibility in terms of vehicular access and ensure prompt delivery of the site.

As drafted, the Policy advises that vehicular access should be provided off Hall Lane. Given the split ownership of the site and that the southern part of the allocation which fronts Hall Lane is in a single ownership, the delivery of this site has the potential to be delayed.

Work undertaken by Cannon Consulting, which is attached to this representation, advises that, in addition to the provision of vehicular access from Hall Lane, options are available to provide an alternative access into the northern part of the site. These access options could provide either a principal or secondary access to the site.

Given the scale of the site, the number of units proposed, and the separate land owners, the provision of an alternative access would allow for the phased delivery of the site; ensuring that the delivery of residential units on the northern part of the site is not delayed. It is, however, recognised that any application would need to demonstrate that it would not prejudice the delivery of the wider allocation.

It is considered unreasonable to delay the potential delivery of the site, when reasonable alternatives in respect of access to the site are available.

It is, therefore, recommended that the wording of the Policy WLP2.14 is amended as follows (proposed amendments underlined):

Land between Hall Lane and Union Lane, Oulton (8.69 hectares) as identified on the Policies Map is allocated for a residential development of 200 dwellings.

The site should be developed in accordance with the following site-specific criteria:

* The site will be developed at a density of approximately 30 dwellings per hectare.

* Vehicular access can be taken off Hall Lane or via land to the north of the site. An additional pedestrian and cycle access should be provided on to Hall Lane at the east of the site. A pedestrian and cycle access should be
provided on to Union Lane.

* Open space totalling approximately 1 hectare should be provided along the frontage of the site on to Hall Lane. The open space should include new landscape features and provide opportunities for informal/natural play activities together with equipment for young children.

* The design of the development should complement the transition from suburban to rural character along Hall Lane and Union Lane. Spacing between detached buildings fronting on the open space on the Hall Lane frontage should be equivalent to that of the buildings to the south of Hall Lane.

* Natural features on the site such as the pond, trees and hedgerows should be retained and incorporated into the layout of the development.

* A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.

* A Transport Assessment and Travel Plan should be submitted with any planning application.

* Any planning application is to be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Summary

As outlined above, the site is suitable, available and viable, and therefore deliverable. On this basis, the site's allocation for proposed residential development is considered to be entirely appropriate, and would represent sustainable development. Environmentally, this site is not considered to occupy a sensitive location and measures can be incorporated into any development to ensure there is no adverse impact on heritage or environmental allocations. In addition, this site is well connected in terms of its proximity to services and facilities and improvements and development can help facilitate improvements to public transport and cycle lanes. In economic terms, the development of this site would provide access to local employment in a highly sustainable location, whilst providing jobs through construction. In terms of the social benefits of the project this site would provide much needed accommodation in a sustainable location.

The proposed allocation under Policy WLP2.14 is, therefore, supported. However, revisions to the Policy are sought to recognise that access to the
site can also be provided from the north; providing flexibility and ensuring that the delivery of the site is not unnecessarily delayed.

Sharon Marsden

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 86

Comment We strongly object to the draft plan on the following grounds
we have 7 windows overlooking the field adjacent to Union Lane. We will lose our privacy and be very overlooked.
union lane floods at the bottom when there is heavy rain, the fields and gardens become very boggy.
the electricity and telephone infrastructure is poor already, with all these additionally homes this situation will be worse.
The draft plan does not show our property
the plan does not show where the road will be but Union Lane itself is not wide enough to accommodate driveway access to properties.
we are concerned about the drainage from the field. Union Lane has long standing issues with regard to ownership of the sewerage system, which led to all properties on Allington Smith Closeu having to install treatment plants.
this part of oulton is very rural, the impact on wild life is enormous, there are many barn owls which are tagged; the hedgerows are well established; bats in the evenin, well established trees etc etc
the local gp services have been closed down, which already has had an impact on other surgeries in the area; we are all aware of how gp services will not cope in 5 years time, without adding a further 800 patients.
parkhill leading into oulton street is already a hazard with 20 mph restriction, potentially adding in a further 300 or so cars will only increase the risk in this area.
the list is endless, ultimately the area is completely unsuitable for large development and influx of this many people and vehicles.
Thank you

Attached documents
Spindler

Section  Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  394

Comment  I live in Oulton with my back garden backing on to this field.

I am absolutely devastated at this proposal to be building so many houses on this site. I wholeheartedly object to this proposal for many reasons. My partner and I have lived here for just over a year and this is our first home. It took us a long time to save up to get onto the property ladder and the reason we chose this house is because the garden is not over looked unlike many other houses we looked at on estates. Our worry is, that after just over a year our house will not be worth as much as we bought it for due to a concrete jungle in our back garden. This is a scary and worrying prospect with a large mortgage. Reading this proposal there is a lot more consideration for the residents living on Hall Road (leaving a hectre between the road and any potential houses) but very little information about how close they will be to the houses the other side of the field and how over looked we will be. It will be a real shame that our country feel home will turn into an estate which is exactly what we didn’t want, we are out of town but with these houses going up it will feel like we are in an urban area.

Furthermore, Oulton does not have the infrastructure to support all of these proposed households. The traffic through Oulton Broad and Lowestoft is unbearable most of the time. The poor road networks struggle to cope with the current level of traffic as it is, surely we cannot put more strain on this before a third crossing is in place? Along Oulton Street there is a 20mph limit which many cars do not abide by putting pedestrians at risk. With increased traffic on this road i am concerned that this road will become even more dangerous. I walk my dog to the park along this road and stand at the zebra crossing for quite a while before cars stop to let us cross safely. It is a very narrow path where you can only walk single file. Children in the area also use this road to get to the local park or community centre.

After the closure of the Drs surgery in Oulton the patients have had to find
other surgeries. We are patients at Bridge Road Surgery and already struggle to get an appointment, so much so that I often put off booking an appointment as it really is too much hassle, this obviously is not ideal and can be potentially dangerous. The already stretched and struggling Drs surgeries do not need any more strain. The local surgeries are not within walking distance either so anyone without transport would need to pay for a taxi. Alongside this, I have increased concerns about where all of the children from these homes will be educated. Being a teacher at a local school I know only too well the drastic cuts education have received. Local schools are full and we have waiting lists, this means children will need to attend schools out of catchment which will be fine if all parents can drive. I understand there have been proposals of a new school being built but how realistic is this? Again, like the third crossing, these things need to be in place BEFORE an influx of people come into the village.

There is an abundance of wildlife living in the field. There is a barn owl that comes out each night circling the field (photos and videos of this are available). Deer, foxes, hares and bats have also been seen in the field on many of occasions. It is completely outrageous that the homes of all of these animals are at risk and we are losing even more of our limited countryside and local wildlife. There is a grade two listed manor house along the field and also a pill box which need to be protected.

I hope you take the time to really consider these reservations and listen to other local residents who I can assure you are as completely devastated as I am over this proposal.

Thank you

Attached documents
Stacy Goddard

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 552

Comment I’m very concerned on the amount of traffic this will add to an already busy area. Sands Lane development has not even finished yet and already creating a backlog at the roundabout on Gorleston Road.

The '20mph' + zebra crossing area is a hazard I have 2 children and like going to the park but no one abides by this zebra crossing + is very dangerous! I nearly got knocked over yesterday!

The field + area around Union Lane has historical and wildlife value. This needs reassessing immediately and has been seriously overlooked.

Historical hedgerows have already been taken down with no prosecution. How will you preserve the area?

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  1626

Comment  • WLP 2.14, supporting text 2.87 (page 73) and policy wording (page 24) – the consideration of the impact on the listed manor house is welcome. However, the suggested open space provision, currently set at c1ha, should also be informed by specific assessments of impacts on the setting to determine development parameters,

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  1708

Comment  Main vehicular access from Hall Lane plus additional sustainable links

Transport Assessment required

Attached documents
**Suffolk County Council Robert Feakes**

<table>
<thead>
<tr>
<th>Section</th>
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<td>Comment</td>
<td>Surface water flood risk from ordinary watercourse which traverses through the site</td>
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**Attached documents**
Suffolk Preservation Society Fiona Cairns

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 713

Comment We object to the allocation of the site for 200 houses on the grounds that it will harm the setting of the grade II* Manor House. The provision of a 1 hectare buffer to the west of the heritage asset is insufficient to safeguard its rural context. We recommend that the number is substantially reduced to allow for an enlarged buffer area and that the policy makes specific reference to the heritage asset.

Attached documents
Suffolk Wildlife Trust James Meyer

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
1255

Comment  
This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the retention of existing natural features and the requirement for an ecological assessment as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Tom Cole

Section Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID 514

Comment I would like to raise a number of issues, that I believe, provide evidence as to why this proposal should not be approved. I believe that this whole proposal of 200 homes on this small area of land would be very problematic for local residents, local road networks and local amenities.

* Firstly, the road network around Union Lane and Oulton, in general is very poor considering the amount of through traffic that passes on a daily basis. Many people travel through to Lowestoft, Great Yarmouth and Norwich through Oulton Street which is a 20 mph zone. Vehicles consistently contravene these speed limits and zebra crossing on this road. This causes danger to other vehicles, pedestrians and dog walkers. The pavement on this road is also very small. With the proposed increase of houses at this site traffic through this area would increase considerably, posing a significant risk to pedestrians and other vehicles. This would be as a direct result of your proposed plans. Similarly, I note that access to the site would be from Hall Lane, which again is a rural bending road. Surely an entrance site on this road would contribute to an accident black spot and, again, pose significant risk to road users.

* Local amenities are another problem posed by this new development. There are very few local shops and businesses within Oulton village and the nearby Supermarkets such as ALDI are already overcrowded and overused. Your proposed development would greatly increase the population within Oulton village, yet the amenities are not in place to cater for these. I know that you have covered amenities within your proposal but these always seem to fall by the wayside, as with the proposed third crossing which has been touted for the last 10-20 years but still not been constructed. Furthermore, the local doctors surgery has recently been closed down with local residents being forced to attend doctors surgeries in Oulton Broad or Lowestoft. At my local surgery it is very difficult to book an appointment due to the population of situated within the area for this surgery. A further influx of people would almost take this to breaking point and will only serve...
to increase risk to the health of local residents, particularly elderly people. For families without a vehicle or any means of transport this would make it almost impossible for them to attend the doctors.

With your proposal you would be heavily contributing to this issue.

* School and education is also a very important issue, as with the proposed 200 houses there would be a massive increase in the amount of children needing school places in the local area. Local schools such as Oulton Broad Primary and Woods Loke are already oversubscribed and I know that residents within our street and area have to send their children to Blundeston Primary. Again, families that may not have access to a vehicle are limited for choice and it will be the children that suffer. I would be interested to know how you intend to cater for these children as I know full well that any potential schools would be built years after your proposed housing site. As stated earlier, all recent proposals to build schools never seem to come to fruition. There is a severe lack of funding within the education system and lack of teachers which mean that ultimately, a new school will not in fact be built!

* Having been first time buyers last year, myself and my partner moved into our house due to the rural location and fact that our house looks out onto the field behind Union Lane. This has an abundance of wildlife that live within this field with a barn owl that flies around the field every night, bats, foxes and deer. I have photographs and videos of these animals, if required. I would like to know how this affects your proposed plans as it states that wildlife has been considered? Furthermore, there is a pillbox situated within this field and a Grade II listed building and again what do you intend to do with this?

* Oulton is a rural and community based village which borders on this field and provides a home for the decreasing wildlife in the area. Your proposed site, in my opinion, would only serve to ruin a lovely local village and ruin the close knit community spirit that is hard to come by in modern society and serve to needless urbanise a lovely country village. This would also severely affect the local wildlife. How would your proposed site also affect sewerage in our area?

As stated above, I strongly believe your proposed site is a very poor decision and very poor judgment of location and I oppose this wholeheartedly.
Attached documents
val moore

Section  
Policy WLP2.14 - Land Between Hall Lane and Union Lane, Oulton

Comment ID  
565

Comment  
I strongly object to this site being added to the Local Plan. Only 3 years ago the Council refused permission to build 53 dwellings on the paddock in Hall Lane, please see DC/14/1023/FUL, all the reasons given for refusal still stand. Hall Lane is a country road full of bends, it will shortly have a lot of extra traffic when the Woods Meadow road is completed. The mini roundabout at Oulton Street/Gorleston Road is extremely busy now without all the extra cars from Woods Meadow, it certainly cannot cope with another 200 homes being built. The main infrastructure for Hall Lane - no mains drainage - being a rat run to get to Oulton Broad avoiding the railway crossing - the road just cannot cope at this present time.

Attached documents
Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Anthony Sinclair

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 456

Comment

Dear Sir/Madam

I am writing in respect to the planned development in Carlton Colville, WLP2.15 Land south of The Street Carlton Colville.

We live in a bungalow at the top of Shaw Avenue in Carlton Colville adjacent to the field where the development is planned. I have several concerns, which I have listed.

* Our privacy being overlooked, our bedroom window faces the field if houses are built next to us they will be able to look directly into our bedroom and also into our living room, which is in the extension at the back of our property.

* The type of housing that is to be built; if it is housing association homes this will most likely have a big impact on the value of the properties in close proximity. As part of my work I regularly visit properties in housing association estates and see first hand the state of the area. I know not all the tenants are bad but it only takes a few to bring the area down. I have a friend who lived in Dale End Gisleham in the end they had to move out and go into private rental because the area had gotten so bad.

* There are plans for a pedestrian & cycle access leading to the school from Shaw Avenue this would probably mean that some of the parking spaces at the top of Shaw Avenue would go. Parking is at a premium as it is and this would just compound the situation. There is also the matter of the school runs people are not going to drive all the way around when they can come up Shaw Avenue & Low Farm Drive and I am sure you are aware they don’t seem to care where the park on a school run causing a lot of frustration.
* The increased traffic through The Street during and after construction will be bedlam due to the off road parking on the street by the Red House Pub. If each household only has 1 car this could mean potentially 800 extra cars going through the street.

I understand there is a need for new homes but does it have to have such a big impact on the local population when there are alternative options that would have a much less impact on the local population.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1454

Comment We support this allocation.

We have reservations about the scale of the community benefits which the Council seeks to derive from this scheme and the impact that the costs of such benefits might have on the viability of the scheme when coupled with CIL. The wish list sets out the need for the community centre and the country park to be delivered in the early stages of the scheme. Even if this is achievable it will have a very significant impact on the cash flow for the development. Early discussions between the Council, land owners and developers will be need to bring this scheme forward.

Attached documents
Carlton Colville Town Council Alison Ayers

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 904

Comment Carlton Colville town council acknowledge that people need access to Lowestoft but the suggested site off of Bell Farm does not offer sufficient opportunities, nor access to work or leisure activities.

The suggested development offers inappropriate access to the road network as The Street is not wide enough nor are there opportunities to widen it to assist. Surrounding roads are narrow in places making it difficult for 2 buses to pass at one time.

The site is also too near to Kirkley Stream in terms of the ecology of the area, the impact of any run off could have on the stream and its wildlife.

The community hub aspect could be taking care of in existing facilities around the community these just need to be worked on.

The car park area suggested will add to the difficulties that are already experienced on the junction and its proximity to the school.

Carlton Colville already has a large care home with sheltered dwellings which would be within .5 of a mile of the proposed new site. Our proposal site offers better access to the wider community for these services.

Carlton Colville currently provides 18 allotment spaces solely for the use of its residents if the proposed site is also to provide allotments these would be provided for South Lowestoft therefore generating more traffic to and from the area.

The suggested Bells Farm site does not provide easy connectivity to the existing employment areas therefore people would still need to use the village roads to gain access onto the Bloodmoor Roundabout or the A146.

The council would suggest a rethink of the land identified as 179 known as Eades Farm, Beccles Road, Carlton Colville. This site would offer access onto an acknowledged network namely the A146 which has good links to Norwich, Beccles and importantly Lowestoft. The site is approximately
37.96 hectares, the Bells Farm site is 55 approximately with a country park with 15 and play etc, flood mitigation of 3 bringing the development down to approx. 36 hectares therefore there is very little difference to the overall site size Site 179 would not require a country park because it sits next to WLP.18 which is the suggested sports facilities and open space where allotments, dog walking and play facilities could be provided from. There would be no difference in the infrastructure required with regards to water systems and sewerage as the proposed Bell Farm Site would require these also. The cycle paths and footpaths could be provided around the Low Farm site providing the connectivity into the existing locality of Carlton Colville.

We believe that this site would generate the same benefits as those proposed under policy WLP2.15

Our proposed use of the 179 site would allow for the existing community of Carlton Colville to continue to benefit from a semi-rural environment and also the new dwellings would also benefit from a semi-rural feel.

Following an open day for residents (see below their objections) for the proposed, several of them expressed the same views as the Town Council and a preference for the development of site 179.

Waveney District Council Local Plan

Following the public consultation of Carlton Colville Residents on Saturday 2nd September 2017 the objections and concerns listed below were collected. 70 members of the public attended.

Concerns and Objections

Comments

Infrastructure Flooding

Well documented issues

Greenfield land being used

Following Brexit more arable land will be needed to grow more of our own food

Access Roads

Both road access are coming out onto already dangerous spots and very narrow roads
Infrastructure Doctors, hospital, dentists
Already at capacity

Infrastructure Schools
Primary schools and High schools already at capacity

Infrastructure Sewerage
Well documented issues

Infrastructure Roads
The Street and surrounding are very narrow and will not cope with an influx of traffic
Double decker buses already go on the path due to road width
Roads become 'Rat Runs'
Castleton Avenue was built to take the traffic away from the village now we will be bringing it back via Lowestoft Road/The Street
Lack of footpaths
Particularly dangerous for children

Destruction of Village feel and community
Residents moved into village for that way of life
The area was semi-rural now be more of a housing estate

Obstruction of country views
Carlton Cross residents
Devaluation of Property

Noise pollution
Traffic

Light pollution
Development of Brownfield sites first

Sanyo, Jeld Wen
School Parking
Low Farm Drive very small quiet cul-de-sac will end up having lots of school parking for new school

Affordable homes
Make sure priority is given to local people

Loss of water pressure
This has already been reported in the village

Bloodmoor Road Roundabout
Already a major issue without increased traffic

Power supplies
Will be overloaded

Loss of wildlife

Employment concerns
Where is the employment for all the new houses

Designated Bridleway required
If sports development happens for safety of horse riders in the area

Attached documents
Caroline Gregory

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 185

Comment THERE IS VERY LITTLE TALK IN THE OVERALL PLAN OF BRIDLEWAYS AND OFF ROAD RIDING. GIVEN THAT THE MAJORITY OF THE AREAS ARE RURAL THIS SHOULD BE CONSIDERED HIGHLY IMPORTANT TO THE OVERALL PLANNING BY THE COUNCILS. THERE IS TOO MUCH EMPHASIS ON CYCLING AND FOOTPATHS.

Attached documents
D Stone

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 655

Comment I see that the proposed access to this site is via The Street in Carlton Colville. Having lived in the village for almost 40 years and worked in it for almost as many years as a community police officer, I have to say that The Street in it's current form will be totally inadequate to provide access to this development. At present there are times when traffic struggles to get through the narrow section between Hall Road and Rectory Road, with the increased levels of traffic that this development will bring there is no doubt that the current road structure will not cope.

The Street as it is will not lend itself to any form of widening or other alteration due to the proximity of residential dwellings etc. as such the only other feasible alternative is to construct a new means of access to carry the main weight of traffic, in my view the obvious area to explore for this is to the East as this is the closest access to a main road, the A12, and will also allow the employment opportunities on the South Lowestoft Industrial Estate to be filled without creating further traffic issues in the centre of the village. Such a road would also relieve the pressure on Bloodmoor Road, which currently suffers some serious queues at various times of the day, relief of pressure on this road will also relieve the pressures on the roundabout at the junction of Bloodmoor Road/Stradbroke Road etc., which despite the recent modifications ( which seem to have caused motorists more confusion rather than helping the flow of traffic ) is still as bad as it ever was.

Attached documents
Dave Brown

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 150

Comment Has any consideration been given at all to the current residents of The Street and the impact the extra traffic will have on them? The quality of life will be destroyed in what is a very pleasant area.

Castleton Avenue was built to divert traffic away from residential areas like The Street and now you are going to turn it into a rat run into the new development. Particularly with the levels of on street parking taking place on The Street between the Rectory Road Junction and the Mardle it will become a massive bottleneck and simply won't work.

I can't stress strongly enough how big a mistake this will be and how it will detriment the lives of the current residents.

Is the Council's agenda to simply build as many houses as possible, at any cost, in order to maximise council tax income? I suspect it is.

I cannot object strongly enough to this thoroughly ill-conceived development.

Attached documents
Dave Clarke

Section  Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID  21

Comment  I don't want this blot on the landscape, I love looking out of my house onto fields not someone house or hearing screaming child! But as you are Waveney district council you will do what you want! And continue to mess this town up.

Attached documents
**Environment Agency**

**Section**

Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

**Comment ID**

866

**Comment**

Paragraph 2.97 makes reference to the opportunity to incorporate flood risk management measures into any development at Carlton Colville which is reflected in policy. We are fully supportive of the proposed use of land for flood mitigation measures. The Lowestoft flood risk management project (led by Waveney District Council) has investigated ways of reducing flood risk to people and property in Carlton Colville, and we recommend the outcomes of this work are used to inform the proposed mitigation measures on the site. The exact location of the open space for this flood mitigation shown on Figure 12 may differ from that shown, especially if a linear diversion channel is required on the north of the site to reduce flows into the Anglian Water sewer under The Street. Suffolk County Council have identified a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues. Any opportunity to reduce the existing risk should be pursued and it would be beneficial to include this in any policy for the site.

**Attached documents**
Gisleham Parish Council Derek Ward

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1108

Comment The draft master plan includes area WLP2.15 as a preferred site for development. However, we feel this area is unsuitable for the level of development proposed.

We understand, due to the natural constraints of Lowestoft, the North Sea to the East and Oulton Broad and the marshes to the West, development has to be along the north-south axis of the town.

Area WLP2.15 has been identified as high quality agricultural land, this is an essential requirement to provide food resource for both local and national use.

The use of this area for the proposed 800 properties would put a significant strain on the country roads to the south and west of the development, on which vehicles would be forced to use to access primary roads.

Carlton Colville primary school has sufficient land within its boundary to enable improved parking on its site, without utilising valuable farm land.

Other factors which make WLP2.15 unsuitable for development are:
* the well documented issues with regard to flooding
* reduction in wildlife habitat
* increased pressure on road networks
* pressures on facilities such as Doctors Surgeries

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 956

Comment The Plan includes a number of proposals for large scale strategic allocations that account for much of the Plan’s housing requirements including Policy WLP 2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood; Policy WLP 2.12 – North Lowestoft Garden Village; Policy WLP2.15 – Land South of The Street, Carlton Colville/Gisleham; and, Policy WLP 3.1 – Beccles and Worlingham Garden Neighbourhood. Whilst the identification of strategic allocations is an approach that can be 'made sustainable' through the timely provision of associated infrastructure, it is essential that local plans take into account the risks associated with the delivery of any such schemes and the knock on effect that this can have in terms of housing delivery. It is also noted that the Plan is not currently accompanied by a viability study and it is vital that this evidence is produced alongside robust assumptions regarding infrastructure delivery and its impact on the likely rates of delivery from strategic sites.

As indicated in response to Policy WLP1.1, it is essential that the Council’s suite of housing land allocations can demonstrably deliver the local plan requirement over the plan period whilst maintaining a five year housing land supply.

Attached documents
Graham Hunt

Section  Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID  533

Comment  This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Although a "Park and enhanced landscape buffer" is proposed for the southern edge of this development. This would take many years to establish and give the required soft edge to the development. With these factors in mind I wish to make my opinion clear that this area should be considered for a more "in scale" development that would breathe life into the old area of Carlton Colville.

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Heather Leybourn

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<td>There needs to be provision of a road between developments WLP2.15 to WLP2.16 for local traffic moving between the residential area and the many retail outlets on the employment area. This would cut down on the terrible traffic congestion that currently exists at the roundabout where the A12 meets the A1145 and the road to Oulton Broad.</td>
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**Historic England**

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<td>Comment ID</td>
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| Comment | The proposed allocation at Carlton Colville is for 800 houses on a site which includes a scheduled monument known as Moated site 200m south west of Bell Farm (LEN: 1018331). The scheduled monument has not been identified in the policy or supporting text for the allocation or in the Strategic Housing and Economic Land Assessment (dated 2017). For the reasons set out below, we find that the proposed allocation would have a negative impact on the scheduled monument and its setting and would result in harm to its significance, therefore we find the allocation unsound.

The monument consists of a moated site situated on level ground some 200m south west of Bell Farm. The moat ranges from 10m to 15m in width and surrounds a small, central platform. Access to the platform is via a causeway across the eastern arm of the moat. A medieval lead seal and seal matrix found in the vicinity of the moat provide evidence for the high, probably manorial status of the site and date its origin to the 13th century. The site survives well and is unencumbered by later buildings. It is, therefore, an important monument retaining archaeological information concerning the construction and occupation of the site during the medieval period. Moats are a significant archaeological feature in the rural landscape of Suffolk and derive a considerable amount of significance from their rural context and setting.

Any development that includes and is within the setting of a rural moated site is therefore likely to have an impact upon that significance. We note that there is already development to the north of the scheduled monument along the northern side of the road known as the 'The Street', as well as new development along the eastern side of Rushmere Road close to the junction with Hall Road. The monument does however maintain a rural character and aspect with open countryside to the east and south, where the allocation is proposed, and the moat is set well back from The Street and from Rushmere Road. The north and western side therefore has a semi-rural character which reflects the moats location on the urban fringe. We
therefore recognise that there has already been some change to the setting of the monument from the existing development, however the proposed allocation would remove the remaining rural context and setting for the monument and the indicative masterplan on page 76 requires the main access road for the development to connect to The Street next to the scheduled monument.

We also would highlight that the policy and supporting text do not identify that the scheduled monument will be affected by the development, neither has the impact on the monument and its setting been assessed. In fact, in paragraph 2.93 it states that the "sensitivity of the landscape is low", an assessment that we would disagree with. We have not seen evidence of a heritage impact assessment setting out whether or not any development is possible, what the effects would be of development on designated heritage assets and their settings and, if development were possible, what mitigation measures and quantum of development would be appropriate given the detailed information about the site. We would expect such an assessment to determine whether an allocation should be taken forward or not and, if so, that its findings are incorporated in the policy and supporting text. In the absence of such an assessment, we do not believe that the evidence is there to justify the inclusion of this site allocation.

Attached documents
J Kent

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 133

Comment stop destroying Carlton Colville.. We cant handle any more homes. the existing roads are bad enough with traffic let alone up to 800 more cars each day. All it is is money hungry building companies taking away peaceful countryside which the residents of Carlton Colville prefer we don't want homes or sport centres we wants our landscape and fields and countryside stop taking it away. Carlton Colville used to be a village now look at it.

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| **Comment** | Plan WLP2.15: concern that The Street is incapable of absorbing increased level of traffic from WLP2.15 particularly at peak times given planned 800 new homes and school. Note: there is frequently onroad parking both sides of The Street.  

Plan WLP2.15 will aggravate existing peak time congestion from Castleton Avenue/Castleton Drive to the London Road roundabout for traffic going to Lowestoft or A12 south.  

Plan WLP2.15 does not provide an easy access route to Beccles/Norwich A164. Traffic will naturally take most direct route: Hall Road/Church Lane, Chapel Road; again already busy roads. A new school is being readied on Church Lane; understanding that this is a special school which will attract traffic from outside the area leading to further congestion.  

Plan WLP2.15: provision is suggested for 'parking for existing primary school [Carlton Colville Primary School]: whilst this will alleviate congestion around immediate school, access would still be from The Street; there will still be significant traffic levels overall  

Plan WLP2.15: overall scheme may be workable if a new, southern ring is created with access to A146 and A12.  

Plan WLP2.15: Pedestrian Way through Ullswater - in principle acceptable as pedestrian way only.  

Plan WLP2.15: does scheme allow for parking for two cars on each drive? Issue locally with cars parking on kerbs obstructing prams/pushchairs. Ideally scheme should allow two cars per drive and include enforcement of no parking on kerbs.  

Comment - Alternative options: Beccles Road [188, 7, 112, 11, 179: these options border existing main road and access to Lowestoft and Beccles/Norwich and therefore may be considered better options for traffic.
management.

ENDS

Attached documents
Julian Rogers

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 771

Comment My comments are contained in the attached document. The attached document also includes photos as supporting evidence/information. The comments without photos are also pasted here;

Thank you for the opportunity to comment on the draft master plan for Carlton Colville/Gisleham. As it is currently presented I believe there are a number of strong objections to the scale/breadth and layout of the proposals. However, the sites previously identified (as pink) overcome many of these key objections and should be re-considered and re-prioritised.

My comments are set out below:

* The plan for the area WLP2.15 is in conflict with the National Planning Policy Framework which states:

'......development should be distributed in a way which a) reduces the need to travel, b) promotes regeneration of brownfield sites, c) promotes and retains existing services and supports rural areas. When considering how development is distributed, it is also necessary to consider the effects on existing infrastructure and the environment of how development is distributed. (Source: UK Gov; National Planning Policy Framework)

This significant development (800 homes) does not: reduce the need to travel, is on a rural Greenfield site which is placed outside of existing road and communication networks and imposes significant impact on existing infrastructure – roads, high schools, utilities (eg water/sewage) etc.

The previously identified sites - 111, 112, 7, 188, 179 (along with the new site WLP 2.16) are significantly more in line with this framework in that they are lower grade agricultural land – less Greenfield impact, located adjacent to major established road and bus routes and closer to the main areas of economic growth.
They maximise use of existing infrastructure and as smaller overall sites have overall lower environmental (water/sewage/flooding/light/historical site) impact (and as proposed in the draft proposal green corridors could be included as 'buffers' to minimise impact on any surrounding sites).

They also fall within the sequential test for Town Planning which that guides development towards town centres first, then edge of centre, then out of town locations. As they are primarily located on the edge of centre they would conform. The current proposals fall outside of the town development in that they cross the boundary to Gisleham.

They provide the advantages of delivering housing without the negative impacts of such a large scale development as proposed. Their spread allows for individual 'character' developments to be created which will enhance the built environment.

2. The layout and position is in conflict with the Suffolk Local Transport Plan which states:

'The impact of new developments on congestion levels on the network must be reduced if future problems are to be avoided'. (Suffolk Local Transport Plan 2011-2031 Part 1 – Transport Strategy)

There is no provision in the proposal to reduce impact on south Lowestoft congestion. It only addresses one aspect of congestion with regards to Carlton Colville Primary school. There would be severe and additional impact of 800 households plus service and utility vehicles at both the already busy Bloodmoor Hill roundabout and in the existing old village centre of Carlton Colville.

The road layout as currently configured drives all the proposed household traffic through the centre of an already congested ‘village’ centre with no opportunity to create an enhanced environment without affecting existing householder and business parking/traffic calming.

There is no direct link with either the developing south Lowestoft Industrial estate or A12 or any proposal to create a South Lowestoft relief road – channelling west bound traffic away from already congested routes.

In this draft buses (including school buses) and other transport means are forced to continue to use inefficient country (old village) roads to access the large-scale development.

The part of 'The Street' affected by the proposed access roads is narrow with on-street householder and business parking. There is no opportunity
to widen the road. There are narrow paths and any limits to parking would not only adversely affect current householders but may also impact existing local businesses eg shops, pubs, garage. In addition, there is a large mature Oak at one of the proposed access points that would be harmed or lost under this proposal.

(See attached document - View from the west looking eastwards along The Street – residents and business parking – effectively single lane)

(See attached document - View from the east looking west – congested, single lane driving, cyclists, businesses and pedestrians)

The proposed access to the school via Ullswater and Shaw Avenue will recreate the congestion problem experienced at Carlton Colville Primary school ie parents will park/access the roads closest to the school site, creating congestion and disturbance.

Suggestion: The roads to the east of the old village centre are wider and more appropriate to access/movement. Is there any opportunity to create road access via Shaw Avenue or Low Farm Drive? This would keep traffic out of the village centre, make use of existing wider roads and provide quicker and easier access to the established main traffic routes (Castleton Way and Bloodmoor Hill/Cotmer Road).

* The proposals are also in conflict with the 3 principles set out in the Suffolk Local Transport Plan:

Principle 1: Reducing the need for travel

The siting and scale will inevitably mean that householders, emergency services and utility services will travel through South Lowestoft to North Lowestoft where the jobs and major public services are (eg Hospital) are located. The Draft plan in other areas recognises that North Lowestoft is where the focus of jobs are or will be located. This is also recognised in The Employment Land Needs Assessment (2016) which identified that 'demand for employment land was higher in North Lowestoft'. (Source: Suffolk Local Transport Plan 2011-2031 Part 2 – Implementation Plan)

(See photo in attached document)

The location of the proposed development increases the need for travel and does not discourage travel nor is it accessible to the main road routes or main economic growth areas therefore adding to problems not alleviating them.
Principle 2 - Making efficient use of transport networks

The scheme does not link or enhance existing transport networks. The circulatory nature of the road proposed only services the proposed development and creates further inefficiencies - traffic is still forced to use either Lowestoft Road, The Street and Hall Road to access and exit the development where problems are currently acknowledged.

Principle 3 - Improving infrastructure

The plan does not improve transport infrastructure. The size and scale of the development (including proposed primary school) warrants a full scale impact assessment on High Schools. The local High Schools are at or close to capacity. A development on this scale would create a need that may not be catered for. There would be an impact on services including the impact on the existing sewage infrastructure that runs along The Street and Lowestoft Road. This latter is at capacity and a development on this scale would have inevitable detrimental impact. There is no commitment to improve this infrastructure outside of the development.

* Comments on the specific paras and principles raised in the draft document

2.92 The site (54.88 hectares) comprises a number of arable fields south of The Street in Carlton Colville and Gisleham.

This description is inadequate. It should make reference to the fact that it includes a scheduled Historical monument. It should also reference that its northern boundary with the old village forms a natural flood plain with streams, natural ponds and dykes. The views to the South and south west incorporate views to the Grade 1 Listed Gisleham church.

2.93 The site is a logical extension to the existing built up area. The sensitivity of the landscape is low and development could improve the existing exposed edge of the settlement around the Ullswater development. The site has good access to employment opportunities in South Lowestoft Industrial Estate and the nearby retail facilities.

This is incorrect. The site (on the proposed scale) is not a logical extension for the reasons given in 1 and 2 above and for the points below:

Carlton Colville can be currently characterised as existing in three ‘hubs’:

* The old village – limited access, narrower roads, narrower paths, limited cycle ways but linked to the main traffic routes through Lowestoft Road to
Castleton Avenue and the east and through Chapel Road/Beccles Road for the west. Problems of flooding, historically relevant buildings or sites.

* The Rosedale development – new built with shops etc but (importantly) with new purpose built access roads – linking directly to the main traffic routes (Beccles Road and Cotmer Road)

* The Dales/Bloodmoor Hill development – new built but again (importantly) access to the main traffic routes albeit through the congested Bloodmoor Hill junction

The proposed development would make a 4th hub. However, this is 'bolted on' to the old village without direct links to the main access routes/jobs/infrastructure. It neither creates a 'link' between the communities nor addresses the main infrastructure challenges.

The sensitivity of the landscape is high and should be reviewed by the relevant experts. For example there are valuable and useful flood plains/meadows recognised in the plan but there are also natural ponds and there are long established hedgerows and trees that need protecting. There are sweeping views from the east and south that enhance the urban environment. There is a listed historical monument whose context, setting and curtilage should be preserved.

(See attached document - View from the North East to South West showing mature trees and headrows and sweeping view to Gisleham)

(See attached document - Scheduled Monument and flood plain/meadow – view from the footpath off The Street)

Proposed road access point to the east of Bell Farm. Mature oak and ancient hedging that would be lost.

2.94 Carlton Colville Town Council has expressed a desire to create a new community hub. There is already some funding available from a section 106 agreement from the Carlton Hall development. The development of 800 homes on this site provides an opportunity to provide funding and land for this development.

The plan locates the hub at the extreme western edge of the development. This location does not benefit existing communities which are primarily located in either the old village, the Rosedale or Dales estates. The hub should be closer to the centre of all three residential developments to reduce the need for travel and create opportunities for greater community
interaction/cohesion.

Suggestion: If Bell Farm ceased to be a commercial operation because of the development would not the existing farm buildings provide a unique and centrally located site for a community hub?

2.95 A development of 800 homes on this site provides the opportunity to deliver a new primary school in more central location serving pupils in the South Lowestoft and Carlton Colville area. This will help reduce the need to travel to the existing Carlton Colville Primary School in the future. Additionally, the site provides an opportunity to deliver parking and drop-off space for parents at the existing Carlton Colville Primary School to relieve pressure on the existing streets around the school. Parking could be shared with the new community hub.

The new proposed primary school will have only one entry per year. Carlton Colville has two currently. Is the level of provision adequate? In addition, has the effect on the local High Schools been assessed – if they are currently at or close to capacity will this provision cause a need for additional facilities?

Secondly, the problems of Carlton Colville Primary School will be transferred to the centre of the village i.e. after drop off parents living within the existing 'hubs' will be forced to drive back through the old village centre to their homes.

2.96 Waveney has an ageing population and the Strategic Housing Market Assessment (2017) identified a significant need for new sheltered and extra care housing and new care homes. This large site, which will likely be delivered by a number of developers provides an opportunity to deliver a retirement community comprising a care home and a proportion of extra care and/or sheltered dwellings. The development should be designed, utilising dementia friendly design principles (see Policy WLP8.29 on Design).

Whilst the general need for such provision is acknowledged locating it in this setting is not logical as it will create additional significant traffic movement that will simply add to the traffic movement congestion as outlined in comment 2 above. There is also existing services of this sort provided by Carlton Hall and at Carlton Court. Should this provision be placed in Central or North Lowestoft with better access to support provision – eg James Paget and other community health facilities?

2.97 The Environment Agency has indicated that the development of land in this location could provide an opportunity to deliver flood risk mitigation
measures for the Kirkley Stream. Land on the northern part of the site is within flood zone 3 associated with the Kirkley Stream and should therefore be set aside to allow for potential flood mitigation and also act as part of the open space provision on the site. This open space should provide a local equipped area for play and could also provide an area for allotments to help meet the current South Lowestoft need.

The plan shows the roads exiting (to the west and east of Bell Farm) the proposed development through key natural open areas where there are naturally occurring ponds and low lying meadowland which mitigate flooding of Kirkley Stream. Both access onto an area where there is known to be regular flooding persistent flooding despite remedial work.

Any development should preserve the 'green corridor' of existing meadows from the north west of the proposed development (Secrets corner) through past Bell Farm and to the proposed location of the Primary School. This would provide a 'soft edge' to the existing community and also not only provide flood mitigation but also a wild life corridor. It would be in accordance with:

Recommendation 26: By 2018, all Neighbourhood Development Plans and Parish Plans should ensure the natural environment is fully considered. They should maximise opportunities to conserve, enhance and link Suffolk’s green and natural spaces. We will support the development and implementation of these plans. (Suffolk Nature Strategy 2015)

Whilst the draft sets out the criteria that any developers should provide flood remediation within the development it does not assess or allow for the impact on the existing infrastructure e.g. main sewerage along The Street and Lowestoft Road which would have to absorb the outflow from the development.

Carlton Colville already provide allotments. Whilst the provision of allotments in general would be welcome providing allotments to meet a wider South Lowestoft need on this site would create further inward vehicular movement and congestion.

(See attached document - View looking west from Bell Farm – a natural green belt/corridor with trees/hedges and water along the stream)

The site on this scale will provide significant light pollution on those areas of 'green' left within the proposal and also in itself have a negative impact on what is currently intrinsically dark landscape.
2.98 A country park should also be provided to the south of the site close to the existing Carlton Colville Primary School. The Country Park should include a fenced neighbourhood equipped area for play, together with a Strategy for Lowestoft | Waveney Local Plan First Draft | July 2017 76
www.eastsuffolk.gov.uk/newwaveneylocalplan
[http://www.eastsuffolk.gov.uk/newwaveneylocalplan] landscaped area for dog walking and other recreation. This will help reduce pressure from dog walking and recreation on nearby protected habitats such as Kessingland beach.

Suggestion: At the moment all the other residential 'hubs' that make up this part of Carlton Colville would have to access the Park through the residential estate. This would increase rather than reduce the need for travel. However, if this Park were to be on the northern edge of the development it would have the double advantage of a) linking with the existing flood plain/ proposed open sites and b) provide potential opportunity for a future link the residential development via Church Road (linking Gisleham to the South Lowestoft Industrial Estate roundabout directly abutting WLP2.16) and c) provide a buffer between existing developments and the new development avoiding the creation of a 'super estate' with all the issues that would entail.

2.99 The southern boundary of the site is very exposed to landscape and it will be important not to create a hard exposed edge, as the current Ullswater development does. Therefore land should be set aside on the southern boundary to allow for hedgerow and tree planting to soften the edge of the development. The development of the area should exhibit exceptional urban design. It should score particularly well against Building for Life criteria (see Policy WLP8.29). Developers are encouraged to seek Built for Life Quality Mark for housing development on the site.

This should also be on the northern edge of the development too since a large number of residents will be affected

2.101 The site has a very high potential for archaeology and any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Of special note should be the Scheduled Historic Monument to the West of Bell Farm. There should be no building (roads or residential) that affects its setting and context (as per National Historic Monument Policy)
Reference: Moated site 200m south west of Bell Farm

List Entry Summary: This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Culture, Media and Sport. Name: Moated site 200m south west of Bell Farm List entry Number: 1018331

2.102 An indicative masterplan has been prepared as shown in Figure 12. Development proposals should have regard to this indicative masterplan. However, it may be necessary to amend the masterplan dependant on the results of the archaeological survey if any remains need to be preserved in situ. A detailed masterplan will be required to be submitted with any planning application for the site. The detailed masterplan should be informed by consultation with the community.

This should also be accompanied by a biodiversity assessment by the relevant expert bodies

Comments on the site specific criteria

I have added comments to your draft site specific criteria where relevant:

* Vehicular access should be off The Street. Pedestrian and cycle accesses should be provided from Ullswater, Shaw Avenue, Low Farm Drive and Gisleham Road.

Objection: This proposed access is contrary to the Transport Strategy and also impacts the flood plain and historic monument – should be reviewed

* The northern part of the site (3.4 hectares) which falls within flood zones 2 and 3 should not be developed and instead used for flood mitigation, surface water drainage and open space including the provision of a local equipped area for play and allotments.

Proposal: The identified area should include all the land abutting The Street to the west of Bell Farm

* Land should be set aside on the southern boundary to allow for hedgerow and tree planting to soften the edge of the development.

Proposal: And on the northern boundaries to lessen the impact on existing residents

* Existing public rights of way should be accommodated within the
development and link to public rights of way to the south of the site.

Proposal: Including those to the north of the site as well (specifically in the area of Bell Farm across to Gisleham Church)

* The car park for the community centre should be a shared use as a drop off and pick up point for children attending Carlton Colville Primary School.

Objection: The community centre should be located to the east of the development. Carlton Colville Primary School should have its own parking

Additional comment: The criteria make no mention of allotments whereas this is described as a need earlier in the document

Attached documents http://consult.waveney.gov.uk/gf2.ti/af/799778/134703/DOCX/-/8684949%20Planning%20comments%20on%20the%20proposed%20Carlton%20Colville%20Development%20WLP%202015docx.docx
Kevin Ogston

Section
Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID
573

Comment
We strongly object to the proposal to develop land south of The Street, Carlton Colville/Gisleham for the following reasons;

The existing arable fields being considered for development are wonderful and financially viable as they are and represent a valuable environmental asset in their own right. They provide a superb 'backdrop' to all the properties surrounding them and provide an environment that is free of noise, artificial light and traffic pollution as well as giving privacy to those properties bordering, all positives that add to residents well being and quality of life. In addition the fields allow a diverse collection of wildlife to flourish in an ever diminishing countryside. Whilst any development can be justified in many ways if this development does become a reality the serious impact on the neighbouring properties should be considered and positive far reaching steps taken to mitigate the impact it will have on those properties. It should further be noted the mere fact this development is being considered has a serious impact on the value of neighbouring properties and their desirability. This is also the case if the development goes ahead and throughout the years it is being developed. In practice this means residents who may wish to move because of the development will suffer a serious financial penalty.

Taking a broader view there has been extensive development in and around Carlton Colville throughout the past decades which has transformed the quiet 'village' into a fairly characterless suburb of Lowestoft. Shouldn't Carlton Colville be allowed a good length of time to mature and settle before further extensive development is commenced?

We take particular issue with the following notes as to why the proposed development is needed;

1. The proposed plan provides for two small areas of open/play space and flood mitigation of 3.4 hectares on the northern side. This is dwarfed by the proposal for a country park of at least 15 hectares on the southern side of
the site, some 341% larger. Would it not be far more beneficial to local residents if the size of the areas were reversed in full or at least in part. The country park as proposed would be on the outer southern edge of the development and as such is will not be as accessible to local residents as it would on the northern side where it would be surrounded by housing and close to the proposed new primary school. It is far more likely to be used and enjoyed by the local residents if it is in a more central position. Furthermore the closer it is to residents the more likely access will be made on foot rather than driving, this in turns decreases the adverse environmental effect. In addition the impact of this proposed development on existing residents bordering the development will be greatly lessened by having the country park acting as an effective buffer zone.

2. 'Carlton Colville Town Council has expressed a desire to create a new community hub.' Why is a new community hub needed (not simply desired). If a new hub were to be built what will happen to the existing? Will it and the land it sits on be considered for residential development? If so there is an argument for this proposed development to be adjusted to include fewer domestic dwellings.

3. Does Carlton Colville actually need another primary school, is it not the case it will only do so if this development goes ahead thereby creating the need.

4. 'The site has good access to employment opportunities in South Lowestoft Industrial Estate and nearby retail facilities.' What evidence is there to suggest these 'employment opportunities' exist and those that do cannot be filled by drawing from the existing local population. In reality most residents of any new development are likely to commute to more affluent areas (Norwich, Beccles) where there are greater and more financially rewarding employment opportunities.

5. Land on the northern part of the site is within flood zone 3. Development will inevitably lead to increased 'run-off' from the developed area and exasperate the annual flooding in the northern part of the site. However if the proposed 'country park' was moved to this part of the site (as previously suggested) provision could be included for the collection of water to create a feature and wet habitat.

6. 'Development could improve the existing exposed edge of the settlement around the Ullswater development.' What evidence is there the residents on the Ullswater development will prefer further extensive development rather than the existing farm land?
We sincerely hope our views and comments will be afforded full consideration.

Attached documents  
Matt Gunns

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 77

Comment We purchased our home with the main aim of the lovely view from the garden. The proposed plan will destroy our view and completely de-value the price of our home, possibly even putting us into negative equity. We do not want the view of 800 homes, if we did we would have bought a house with this view.

The wildlife will also be destituted as we currently see deer, foxes and hare in this peaceful area.

The light pollution and noise will also ruin the current quiet home that we and our neighbours enjoy. Currently the night skies are perfect for star gazing and the arrival of 800 homes will prevent that. There are many areas of Lowestoft that need improving but this one doesn’t, it’s already lovely to live in.

Further to my email on the 11th August, we have today taken legal advice. Our main question is to why we haven’t been contacted directly? We are now aware of the sign on a post on the corner of the road, but with the plans directly concerning ourselves we would like to know why it was felt that we couldn’t be contacted directly for the following reasons:

1. Our home was recently valued. With the plans currently in place, our new valuation will be a difference of 20,000. Losing this much money through no fault of our own should be clearer.

2. Currently there is no way someone can access the rear of our garden. With the new plans we are opening ourselves up to more exposure and risk to security. This could lead to a higher rate on our insurance.

3. With more light and noise backing onto our land, this will change differences to our lifestyles, such as now using curtains and safety to our children. This is a change to our way of life.

We would like to know why it was felt that residents on our side to
Rushmere Road would not want to be contacted directly? We pay our council tax every month and deserve to be treated with some respect and decency.

Attached documents
Michael Kersting

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 383

Comment I am against this development (Land South of the Street WLP2.15).

1. The 'Greenbelt' countryside surrounding Carlton Colville proposed to be developed on is exceptional and enjoyed by all residents of Carlton Colville and a primary reason most live here. With established footpaths through ancient farmland.

2. A very successful bypass road was approved and built to bypass The Street in Carlton Colville, as it is completely inappropriate for more than minor local traffic. This is now intended as the main access to an 800+ home housing development, school and community centre? It's completely inappropriate.

3. The proposal is for a Carlton Colville primary School to be built literally within sight of an existing large Carlton Colville primary School with plenty of room for expansion - this seems absurd.

4. The proposal is for a Carlton Colville community centre to be built close (within a few hundred metres) to an existing Carlton Colville community centre that has a large plot of land attached.

5. The land proposed to be used frequently floods and turns to thick mud and bog from Church Road right to the diverted waterway on the ordinance survey maps labelled a river running along the boundary of the plans. Where is this water to be diverted to? http://data.ordnancesurvey.co.uk/doc/7000000000015440

Attached documents
Michael Kersting

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 441

Comment I’m not sure what the purpose of this comment field option is, as I have no indication any comments have been considered or view of any other comments.

Once again, you are proposing a new additional Pakefield primary school within sight of the existing Pakefield primary school which has ample room to expand away from residential areas.

You are proposing building a Carlton Colville community centre within sight of Carlton Colville Community Centre...That has ample room to expand away from residential areas.

You are proposing building on farmland enjoyed by Carlton Colville residents along various footpaths.

You are proposing building on land with clear flooding problems.

You are proposing using The Street in Carlton Colville as a major access route to a new development, despite the fact it's PLAINLY inadequate and the council built a recent successful bypass at great cost to the tax payer to take traffic AWAY from this road AS it was inadequate for more than minor local access traffic.

Attached documents
Mr & Mrs W Deal

Section  
Policy WLP2.15 - Land South of The Street, Carlton Colville/Gislemham

Comment ID  
567

Comment  
We would like to express Our Dismay & concern over the proposals relating to the next 20 year plan to develop in the Carlton Colville area.

The proposals set out in the first draft indicate a mixed use with 800 dwellings forming the majority of the 55 Hec land area.

Whilst we appreciate that additional housing is required in the south Lowestoft area it is our opinion that to situate this in just one area is not in the best interest of Carlton Colville & will put unbearable strain on the local infrastructure in particular drainage problems & highway congestion.

Currently there is an outline application for 78 dwellings Church Lane adjacent to Carlton Colville Church, should this be approved will this set a precedent for developers to submit further planning applications on other parcels of Carlton Colville land which would impact even further on the locality.

We would assume that should the current proposals be adopted NO further development will be allowed in the 20 year period. Clarification of this point must be confirmed before adoption of the Local Plan

It is noted that two access points are proposed to serve the proposal both leading from The Street.

This is a ludicrous proposal as The Street is not only heavily traffic congested particularly at school times but both points are exactly where regular flooding occurs.

We also note from the Suffolk Design Guide that a Major Access Road can only serve up to 300 dwellings and wonder how 800 properties together with the other proposals can safely be served in direct conflict to adopted highway policies.

Flooding in The Street is well documented & as such new roads will only exacerbate the flooding problems particularly as the proposed access roads
will need to pass directly over Kirkley Stream a main river system vulnerable to flooding.

In our opinion No access onto The Street should be permitted and both areas should act as a green belt break particularly as they are the only two open areas on the eastern side of The Street & Lowestoft Road, a length of approximately 1 mile.

Any access should be via either Low Farm Drive, Shaw Avenue or from the current Dales Estate road system.

It should also be noted that there is an Ancient Monument (a Medieval Moat) located due east of The Street Post Code NR33 8JR and any development in its vicinity must have the approval from Historical England as it is a criminal offence to damage in any way this feature.

Returning to one of our main concerns which is the flooding impact a development of 55 Hec will place on the area.

We note that a flood mitigation area is proposed to the northern section of the site. Will this take into account the current flooding issues as well as that from the proposed scheme? Any Inspector considering the development must be made aware of the current flooding situation and the concerns of the people of Carlton Colville.

The mitigation measures must ensure that not only is the current situation improved but assurance is given that it is not made worse by any development.

As far a highway issues are concerned it is well known that the road system in the area is congested and we cannot see how the infrastructure can be improved by permitting additional vehicular movement in the vicinity. In our view it can only aggravate the problem.

Reading through the various submitted sites and the policies reason for not including them one basic point has not been grasped.

Surely to spread development in a number of locations will lessen the impact on one area and allow both highway and drainage to balance more equally.

We note that land to the west of Beccles Road has not been included and would suggest this be reconsidered as sharing the development area particularly as access would be onto a safer road system and surface water could be discharged directly into the Broads and not Kirkley Stream.
To summarise:

Development must be spread around the area and not in a single location.

Detailed information must be agreed in relation to existing flooding issues and these must allow for remedial measures to be taken at an early stage to avoid further problems with no additional surface water discharge into Kirkley Stream.

No access onto The Street should be permitted other than the retention of existing public footpaths.

Both existing green areas to the east of The Street must be retained to maintain the rural character of the area.

Any current or future planning applications must be offset against the intended 800 dwellings as the infrastructure cannot cope with 800 let alone further development.

We would be sincerely grateful if our concerns and suggestions can receive positive consideration and as a result reduce the area of land intended.

Attached documents
Norman Castleton

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 387

Comment Land South of the Street Carlton Colville & Gisleham

The houses and dwellings adjacent to this area appear to be of little architectural merit so it is probably reasonable to assume that any development will be of the speculative builders usual low standards. All this contrary to the opening statements about the highest architectural standards being required for any new developments. The development is excessive and also on green fields. Transport and logistical links to any facilities and services will be extended if they can be found in austerity Suffolk. Environmentally unsound.

Attached documents
Peter Eyres

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1030

Comment I support the cycling proposals. There is a definite need for a safe cycling and walking route to the school as an alternative to Rushmere Road, which becomes hectic at school in and out times. There should also be provision for a pedestrian/cycle route from the south-eastern corner of the site to the South Lowestoft Industrial Estate extension (WLP2.16).

Attached documents
Peter Harvey and Kathryn Bradley

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 664

Comment I would like to comment on the proposals for land south of The Street in Carlton Colville.

I feel the access roads are in the wrong place. Both of the access roads lead on to the same narrow stretch of road in the old part of Carlton Colville.

Traffic turning left out of the new estate to go towards Beccles will immediately feed into a network of narrow country lanes including Hall Road, Gisleham Road and Rushmere Road. Proposals to allocate land off Hall Road for housing were rejected because Hall Road was considered unsuitable for additional traffic.

It is also inevitable that drivers will try to reach the A12 by heading south up the country lanes past Gisleham Church.

It seems more sensible to have a road on the south side of the estate feeding traffic directly into the main A12 road system. If it is made part of the planning conditions then the developer can be asked to contribute to this rather than the tax payer footing the bill years later when it is finally accepted that the current road system is not suitable for the proposed number of homes.

Also, there is no footpath along one side of The Street from The Mardle to beyond The Gardens and a narrow footpath on the other side of the road. How can you protect the people who don’t have a footpath outside their home and have to step out of their front gates straight onto The Street? My house is on a bend and has no footpath outside. I already find it difficult to cross safely, especially with a pushchair. I am concerned how safe it will be once there is extra traffic.

Traffic turning right out of the estate to head towards Tom Crisp Way will immediately hit a bottle neck in The Street opposite the petrol station. Currently the road is reduced to one lane because the terraced houses
opposite have no off road parking.

The width of the road is restricted by existing buildings and the pavement is extremely narrow along one side from the garage towards Lowestoft Road. How will this be safe when the number of pedestrians and cars increases with the building of new houses? At the very least the second access road needs to connect to Lowestoft Road, which is wider and rarely obstructed by parked cars.

The constant stopping and starting of vehicles negotiating the parked cars during busy times already leads to a build up of diesel and petrol fumes. In the future councils will be responsible for reducing air pollution to protect residents. It seems like adding more vehicles to such a small village street would severely reduce the air quality for those living nearby.

Consideration also need to be given to the appearance of the estate where it meets The Street. The estate will be adjacent to a number of Carlton Colville’s oldest properties including The Bell pub, Bell Farm and and several old cottages. It should be designed to complement and blend in with the old village rather than being another faceless, overcrowded, red brick estate.

Attached documents
Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1458

Comment Policy WLP2.15 allocates 54.88 hectares for residential-led mixed-use development. This land is entirely within the control of our client and we can confirm it is available for development. With a single landowner, early delivery of the site to meet housing needs, is possible. Its allocation in the Local Plan is supported.

Two Illustrative Masterplans (Options 1 and 2) have been developed and are submitted in support of these representations (see Figures 1 and 2 attached hereto). Both Options seek to expand on Figure 12 of the Plan. Key aspects of the layouts shown are discussed below.

The site is well contained, and is surrounded by built development to the north, east and west. The southern boundary currently comprises an agricultural track, but as required by the Policy and as indicated on the accompanying Illustrative Masterplans (see below), extensive areas of open space and woodland are proposed which will provide a more definitive boundary and softer landscape edge to that which currently exists.

Primary Education

It is noted throughout the Plan that the existing Carlton Colville Primary School has a large catchment area and is located some distance from the main built up area of Carlton Colville.

Development of the site, which sits to the east of the existing school, will ensure that the school is closer to the built up area it serves. The school can be accessed from the primary road through the site which will also help to reduce the impact of traffic on the existing roads.

The two Illustrative Masterplans are similar, with the exception of the location of primary education provision.

Option 1 proposes an extension to the existing primary school. Whilst
discussions are yet to take place with SCC as the Local Education Authority (LEA), it is considered that land could be provided in the south west of the site adjacent to the existing school for new playing fields, allowing the school to expand on its current site to become a 3 FE school. A safe crossing of Gisleham Road would be provided.

The benefit of this option is twofold – the expansion of an existing school costs substantially less than the construction of a new school, thus increasing the potential for delivery of other community benefits. In addition, the operational costs of running a single school are again substantially less than running two schools, but also fewer staff are required.

Option 2 shows a new primary school as per Figure 12, but in a more central location within the site. This differs slightly from that proposed in Figure 12 as the northern boundary of the site is largely in Flood Zone 3 and thus the location proposed in Figure 12 is considered to be contrary to guidance in the NPPG.

Country Park

The two Illustrative Masterplans show extensive areas of open space along the northern and southern boundaries of the site.

However, the site is not considered an appropriate location for a 'country park' per se. Country parks are areas for people to visit and enjoy recreation in a countryside environment. As noted above, the site is contained by built development to the north, east and west and it is not considered that a country park in this location will exhibit a perceived countryside environment.

In addition, country parks are usually perceived as being extensive areas of public open space, and we consider that the open space delivered on the site will not be sufficiently 'extensive' to warrant use of the term 'country park'.

The site is located within 1 mile of the Suffolk Coastal AONB and 2 miles from the Norfolk Broads and is therefore within walking and cycling distance of two areas of high quality landscape of national significance. Existing public footpaths through the site will be retained and enhanced, ensuring quick and easy access to the wider countryside.

Notwithstanding the above, the Illustrative Masterplans demonstrate that extensive public open space and landscaping can be provided on the site.
The Policy

The Illustrative Masterplan demonstrates that the site can deliver:

* At least 800 new homes;

* A retirement community comprising a care home / nursing home and extra care and / or sheltered dwellings;

* A 1 FE primary school or land for the extension of the existing primary school;

* Extensive public open and space and landscaping, including allotments, flood mitigation and play space;

* Local shops including a convenience store; and

* A community centre.

Policy WLP2.15 sets out a number of specific requirements for the site, which are discussed in turn below.

* The site will be developed at a density of approximately 30 dwellings per hectare.

The Illustrative Masterplans demonstrate that 800 new homes can be delivered on site at a density of approximately 30 dwelling per hectare. Further discussions with the Council regarding the housing mix and appropriate densities would be welcomed.

* Vehicular access should be off The Street. Pedestrian and cycle accesses should be provided from Ullswater, Shaw Avenue, Low Farm Drive and Gisleham Road.

As shown on the Illustrative Masterplan, two vehicular access points can be achieved from the Street. Pedestrian and cycle access can also be achieved to the site from Gisleham Road.

However, connection points from Ullswater, Shaw Avenue and Low Farm Drive are not within the control of our client, and thus it is unclear whether pedestrian access is available. It is therefore suggested the policy is amended to read

"Vehicular access should be off the Street. Additional pedestrian and cycle connections should be provided wherever possible, including from Gisleham Road."
* The northern part of the site (3.4 hectares) which falls within flood zones 2 and 3 should not be developed and instead used for flood mitigation, surface water drainage and open space including the provision of a local equipped area for play and allotments.

In line with national guidance in the NPPG, only certain land uses are acceptable in flood zones 2 and 3, and these do not include residential development or schools.

As demonstrated on both Illustrative Masterplans, an alternative arrangement of land uses is possible such that no built development is provided within the flood zone along the northern boundary of the site.

We consider it to be overly prescriptive, and also unnecessary, to specify the area of land affected by the flood zones.

In order to ensure a degree of flexibility, it is thus suggested the policy is amended to read:

"The northern part of the site which falls within flood zones 2 and 3 should not be developed for uses which are inappropriate in these flood zones and should instead be used for appropriate uses such as flood mitigation, surface water drainage, open space and landscaping."

* The Country Park should include a fenced neighbourhood equipped area for play and a landscaped area for dog walking and other recreation.

Our views in relation to the country park requirement are set out above.

Two large areas of open space are proposed on the Illustrative Masterplans – along the northern and southern boundaries of the site.

We envisage that at least one of these should include a neighbourhood equipped area of play (NEAP) along with more localised play areas within the residential area.

The extensive public rights of way in and around the site will ensure appropriate provision is available for dog walkers.

In light of this, it is suggested the policy wording is amended to read:

"The site should include at least one neighbourhood equipped area for play, other local play areas and landscaped areas which are appropriate for dog walking and other recreation."

* Land should be set aside on the southern boundary to allow for hedgerow
and tree planting to soften the edge of the development.

Support is given to the proposed policy wording. As shown on the submitted Illustrative Masterplans, an extensive landscape buffer is proposed along the southern boundary.

* Existing public rights of way should be accommodated within the development and link to public rights of way to the south of the site.

We support the proposed wording. The Illustrative Masterplans demonstrate that the existing public rights of way can be accommodated within the development, and connect to the existing network.

* The car park for the community centre should be a shared use as a drop off and pick up point for children attending Carlton Colville Primary School.

Until the eventual layout for the site has been agreed (whether through an agreed Masterplan or planning application), the location and proximity of the community centre to the existing primary school remains uncertain.

Thus whilst we support the requirement for both the community centre and parking for the existing school, we are not convinced that one area of parking will be able to fulfil both roles.

In light of this, it is suggested the policy wording is amended to read:

"The new community centre should be provided with adequate car parking. A new parking and drop off / pick up area should be provided for children attending Carlton Colville Primary School."

If it then proves possible to design a single area to fulfil both roles, the above requirement would not preclude this.

* The development should be phased to allow for the early construction of the community centre and car park and delivery of the Country Park.

We consider this requirement to be insufficiently precise and open to different interpretations as to what constitutes 'early'.

In addition, as the eventual applicant(s) and / or developer(s) are unknown, there is no certainty that the phasing of the development will facilitate 'early delivery. We would thus welcome further discussions with the Council to refine this requirement.

* A detailed masterplan, prepared in consultation with the community, should be submitted with any planning application.
It is anticipated that extensive community consultation will be undertaken prior to the submission of any planning application, and that this will help shape the proposals submitted. However, we consider that reference to "prepared in consultation with the community" could raise expectations of community involvement in the preparation of proposals for the site beyond what might reasonably be possible.

Given the scale of development proposed, it is considered highly likely that the initial planning application will be submitted in outline. As the application might therefore not be submitted by the final housebuilder(s), we consider that the requirement for a 'detailed' masterplan might be excessive – depending on how the reference to 'detailed' is interpreted.

It is therefore suggested the wording of this element of the policy is amended to read:

"A masterplan for the site should be submitted in support of any planning application, which should be informed by consultation with the local community."

* A Transport Assessment and Travel Plan should be submitted with any planning application.

The requirement for a Transport Assessment and Travel Plan is supported.

* Any planning application is to be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The requirement for an archaeological investigation is noted. We consider the Council’s objective to preserve the historic environment to be in accordance with Paragraph 132 of the NPPF.

In addition to the above requirements, we suggest that a further requirement be added. At present, there is a successful horse-riding and livery business located on the site. To assist in securing the future of this business we suggest that a criterion is added such that as part of the planning application process, this business be relocated on land to the south of the site. We would welcome further discussions with the Council on the practical application of such a requirement and thus the wording of an additional requirement.

Viability
The Policy requires certain provisions that are not directly related to the development of the site itself – e.g. the provision of a drop-off point for the existing primary school.

It also includes an extensive list of infrastructure and community services and facilities.

Whilst these are all generally supported as noted above, until detailed costing of such a development has been completed, its viability remains in question.

In order to ensure that the development can be delivered as early as desired, we would suggest that an allowance be written into the Local Plan that reflects the guidance in the NPPF – i.e. that viability should not prevent the development from coming forward.

Again, we would welcome further discussions with the Council on this matter, and in particular on how such a provision should best be included.

**Attached documents**

http://consult.waveney.gov.uk/gf2.ti/af/799778/135099/PDF-/8712693%201%202017%20209%2022%20R%20Meadows%20Son%20LRSouth%20LowestoftComcept%20MasterplanOption%201SN%202pdf.pdf

http://consult.waveney.gov.uk/gf2.ti/af/799778/135100/PDF-/8712693%201%2020
Rachel Knight

Section  
Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID  
837

Comment  
Like so many of these projects we are again building huge developments on arable land of high fertility that is needed to feed our country. There is just not the infrastructure in the area for the increased traffic and no intention to improve the local roads or the wider links to the rest of the country has been made. Also there is a huge issue with unemployment in Lowestoft so why are we proposing to build houses but not making any provision for the people who live in them to work? Are we just going to become a cheap place to dump the unemployed? Housing planning needs to go hand-in-hand with proper development of this hugely neglected area so that this area can thrive instead of getting more and more deprived.

Attached documents
Richard Trigg

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 577

Comment My family moved to our little bungalow at Carlton cross 3 years ago to raise a family. The outlook from the property was the sole reason we moved here. We spoke in length with our soliciter about the prospect of it ever being developed who informed us categorically that had never and wasn't any proposal etc to develop the fields.

The alternate site seems far less intrusive to residents of the village.

Access from the street for 800 houses is madness. Driving or walking at the best of times is a challenge with the school runs let alone adding more trafficked c.

We love the area we live in, it's beautiful and peaceful. And exactly why we moved from Lowestoft.

Some of the proposal like around the bridge toward oulton broad are great and well needed for the town.

One alternate idea would be to swap the 'country park' area in front (north) of the development as to not disrupt the outlook for anyone in the area.

Attached documents
**Russel Hubbard**

**Section**  
Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

**Comment ID**  
54

**Comment**  
In regards to the proposed 800 homes off The Street, Carlton Colville, I don't think that the local road network will be able to cope with the extra traffic. It gets quite congested at the best of times with the school runs. Unless new roads are built for access to the development I think it will cause too many traffic issues. The 3 smaller alternative options (no. 21, 56, 80 and 178), will be better options as the traffic will be dispersed on to several different roads

**Attached documents**
S R Jones

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 324

Comment The proposals for this area throw up a number of issues for the locality.

The Street from its junction with Rectory Road, in a westerly direction, progressively narrows. Particularly from Carlton Cross on the south side there is usually a continuous line of parked vehicles as far at the Bell PF, restricting The Street to a single line. The 800 houses planned for WLP2.15 must equate to 1000 cars all using the narrowest part of The Street. Surely widening of The Street would have to take place to accommodate this extra traffic – this is after all a busy road and a major bus route.

I would suggest that the two access road entrances/exists at only 150 yards apart are too close together. It would be better to loop the westernmost road back behind Bell Farm to join the eastern access so that there is only one entrance/exist to the estate opposite The Mardle. Here the visibility is better. (see enclosed)

There is parking proposed for the existing Primary School in Gisleham Road and to support the new Community Centre. There is, however, non shown for the new Primary School planned at the northern corner of the site. Surely parking will be needed for this new school, for the planned shops and for people using the proposed open space nearby. If not, we will have the same problems as at the Gisleham Road school at present.

The Street from The Gardens eastwards to beyond Famona Road is a notorious flood area – sometimes being impassable. It is to be hoped that dramatic improvements to the surface water drainage are proposed. If not it is most likely that the flooding will become more frequent and deeper.

Similarly the foul sewers of Anglian Water are often blocked and pumped out by them. I understand that the sewage system in The Street has not been significantly improved since it was laid in during the late 1930’s. We must have extensive improvements to the system before allowing 800 homes to be connected to it.
I would be grateful if these comments can be taken into account please.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1627

Comment • WLP2.15 supporting text and policy (pages 76 and 77) – the allocation now includes a moated site, which is a Scheduled Monument (30549). This is within proposed open space. However, WLP2.15 needs discussion of this in the policy and supporting text: there should be a requirement for detailed assessment of development impacts on the setting of the monument, which may affect the illustrative masterplan. References to below ground archaeological remains are sound and should remain as they are.

Attached documents
A number of flood reports have been received from residents who live in the vicinity of the Kirkley Stream, specifically in the Carton Colville area. Therefore the County Council is fully supportive of the proposed use of land for flood mitigation measures.

The Lowestoft flood risk management project (led by Waveney District Council) has highlighted the need to potential divert the existing watercourse to reduce flows into Anglian Water sewer under The Street. The District Council should consider altering figure 12 to reflect new findings.

It is suggested that wording in paragraph two bullet point three is altered to: 'The Northern part of the site is required to incorporate flood mitigation requirement as set out in the Lowestoft Flood Risk Management Project. This section of the site should not be developed instead incorporate the needs of flood mitigation, form part of the surface water drainage and open space, including the provision of local equipped area for play and allotments.'

It is also proposed to include an additional point of; 'The site will comply with policy WLP 2.15 and utilise Sustainable Drainage Systems (SuDS) to manage surface water runoff. Existing surface water flow path traverses the site and should be managed appropriately avoiding diversion where possible.'

The details of this policy are likely to require further discussion as the local flood risk strategy is developed. Consideration will also need to be given to the location of the school relative to the flood risk.
have been received from residents who live in the vicinity of the Kirkley Stream. The County Council would like to discuss discharge rates from this site, seeking betterment on pre-developed rates and discharge at 1 in 1 year rates for all events up to 100 year. SuDS should be utilised to discharge surface water at source.

Attached documents
Suffolk County Council Robert Feakes

Section: Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID: 1653

Comment: Approximately 26ha of Mixed Use Policy WLP2.15 is within a Minerals Consultation Area and according to British Geological Survey data there is potential for this to be an exploitable resource. The material will need to be tested for quality and some prior extraction or use of the material on site may be necessary, depending on the economic value of the material, as stated in Policy 5 [of the Suffolk Minerals Core Strategy]

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1709

Comment New urban expansion site to the south of Carlton Colville. Up to 800 dwellings with access from The Street (currently 30 mph). Site has the ability to provide a solution to the existing traffic problems at the Primary School. Potential for permeability with the existing residential area. Existing PRoW can be utilised and enhanced – seek opportunities to link to WLP2.16. Site masterplan should ensure connectivity for sustainable modes and avoid the major access road forming a barrier to interaction between zones.

Full Transport Assessment and Travel Plan required

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP2.15 - Land South of The Street, Carlton Colville/Gisleham

Comment ID 1256

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the retention of existing natural features and the requirement for an ecological assessment as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Environment Agency

Section | Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID | 867

Comment | These allocated areas potentially drain into the Kirkley Stream catchment, therefore it would be beneficial to ensure that surface water management measures reduce surface run off from future development. As already stated, Suffolk County Council have identified a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues.

Attached documents
Heather Leybourn

Section  Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID  1543

Comment  There needs to be provision of a road between developments WLP2.15 to WLP2.16 for local traffic moving between the residential area and the many retail outlets on the employment area. This would cut down on the terrible traffic congestion that currently exists at the roundabout where the A12 meets the A1145 and the road to Oulton Broad.

Attached documents
New Anglia Local Enterprise Partnership Eunice Edwards

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<th>Section</th>
<th>Policy WLP2.16 - Land at South Lowestoft Industrial Estate</th>
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<td>Comment ID</td>
<td>1173</td>
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**Comment**

New Anglia Local Enterprise Partnership is working with Waveney District Council and other partners to regenerate and deliver jobs in the Great Yarmouth and Lowestoft Enterprise Zone. Four sites, identified within the draft Plan, have Enterprise Zone status. These sites have benefitted from local development orders and, until March 2018, also benefit from business rate relief up to a value of £275,000. New Anglia welcomes the identification of these sites in South Lowestoft Industrial Estate.

Allocated by policy WLP2.16 for B1, B2 and B8 uses. Suffolk County Council is in the process of developing industrial units at this location.

**Attached documents**
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<th><strong>Norman Castleton</strong></th>
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This is still largely landed used to produce food. Therefore, it should not be built on for food supply and environmental reasons. Concreting over a green field area. Industrial development of the kind envisaged should be concentrated on the South Quay which as and will have good access to transport links via land and water. The South Quay is also largely a brown field site.
Peter Eyres

Section Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID 1036

Comment The proposed cycle link to Church Road is important, and so is provision for a cycle link to the southeaster corner of the proposed development on the southern edge of Carlton Colville (WLP2.15).

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID 1666

Comment Discharge via ordinary watercourses will have to confirm where these drain to, if eventually to the Kirkley Stream we would expect betterment, significant flood risk downstream which may affect WLP2.15.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID  1710

Comment  Main vehicular access from Hadenham Road. Seek opportunities for PROW access to WLP.15.

Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID 1658

Comment Policy WDM1 of the Waste Core Strategy states that the County Council "will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made." The following site allocation policies are within proximity of waste facilities. Proposals on these sites must ensure that they do not prevent or prejudice the use of nearby waste facilities:

- Employment Allocation Policy WLP2.16 – this site is adjacent to Lowestoft Household Waste Recycling Centre and within 250m of Lowestoft Vehicle Car Breakers. Proposals at these allocations need to be able to coexist with these facilities.

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP2.16 - Land at South Lowestoft Industrial Estate

Comment ID 1257

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the requirement for an ecological assessment as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Policy WLP2.17 - Land at Mobbs Way, Oulton

Mandy Green

Section Policy WLP2.17 - Land at Mobbs Way, Oulton

Comment ID 1195

Comment With reference to the above consultation I wish to object to the inclusion of the three areas (above) covering the Parish of Oulton where I live.

I have two arguments as to why the proposals should not be within the local plan.

Firstly we already have Woods Meadow with in excess of 800 homes currently being built and without finding out first how this huge development will impact on Oulton I cannot understand how you can agree to an extra 340. I do understand the need for building of new homes but in a measured way which will gradually have the necessary infrastructure improvements being added and that brings me on to my second reason, that of the recent questionnaire that I was asked to complete which is helping to develop plans for the future of Oulton covering housing, services, recreation, and our open countryside amongst other issues. What is the point of asking us on the one hand for our views as to how we see the future of our village whilst telling us that you are allocating more land for housing in Oulton?

Surely it would common sense to allow the process of the Neighbourhood Plan to be completed and then use that plan to highlight areas that the community want to see developed along with the other issues contained within the Neighbourhood Plan Questionnaire.

If you proceed with your proposals as contained within your consultation I cannot see any benefit from continuing with a Neighbourhood Plan.

Attached documents
New Anglia Local Enterprise Partnership Eunice Edwards

Section Policy WLP2.17 - Land at Mobbs Way, Oulton

Comment ID 1541

Comment New Anglia Local Enterprise Partnership is working with Waveney District Council and other partners to regenerate and deliver jobs in the Great Yarmouth and Lowestoft Enterprise Zone. Four sites, identified within the draft Plan, have Enterprise Zone status. These sites have benefitted from local development orders and, until March 2018, also benefit from business rate relief up to a value of £275,000. New Anglia welcomes the identification of these sites in Mobbs Way

New Anglia welcomes the promotion and protection of this site for employment purposes by policies WLP2.17 and WLP8.12.

Attached documents
Oulton Parish Council Lynne Ward

Section        Policy WLP2.17 - Land at Mobbs Way, Oulton

Comment ID    1075

Comment        Land at Mobbs Way WLP 2.17

The Industrial Site has already been subject to screening from Woods Meadow, Planting should have been started before building or at least the boundary should have been marked out according to previous applications, once again local knowledge we feel has been ignored.

Attached documents
Richard Morling

Section Policy WLP2.17 - Land at Mobbs Way, Oulton

Comment ID 814

Comment This area appears to be working well as an industrial site, but consideration has to be given for the parking of heavy lorries. Also if there are to be extensions, access on to Gorleston Road, must be considered with the construction of a roundabout to assist the exit from the estate. This may also need to be considered with the 3rd crossing consultation and the increased in traffic on Peto Way and Millennium Way.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.17 - Land at Mobbs Way, Oulton

Comment ID 1711

Comment No comments

Attached documents
Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Broads Authority Natalie Beal

Section | Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID | 493

Comment | There are some site allocations around Oulton and Oakes Farm, off Beccles Road, Carlton Colville which although not adjacent, are close to and would push the built form of Lowestoft towards our boundary.

Attached documents
Caroline Gregory

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 183

Comment AS WITH ALL THE PROPOSED DEVELOPMENTS IN THE LOCAL PLAN I SEE VERY LITTLE TO SUPPORT EQUESTRIAN ACTIVITIES AND PRESERVE AND DEVELOP OFF ROAD RIDING

Attached documents
Environment Agency

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 868

Comment These allocated areas potentially drain into the Kirkley Stream catchment, therefore it would be beneficial to ensure that surface water management measures reduce surface run off from future development. As already stated, Suffolk County Council have identified a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues.

We welcome the conservation of hedgerows and trees within the development.

Attached documents
George Redpath

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 98

Comment A new sports facility is very welcome in Lowestoft, but suggest this is a poor location from a traffic management perspective?

I suggest there will be a build up of traffic from this development to and from the A146, and onto the roundabout, especially at peak times?

You will be aware of the huge tailbacks that occur on a daily basis at peak times. I refer to traffic on the A146, heading into Lowestoft from Beccles & Norwich? The traffic backs-up from the roundabout adjacent to Oakes Farm, which joins the A146/Beccles Rd with Anchor Way and the A1145. This build-up of traffic can on occasions extend to the Barnby bends, I know I've been caught up in these tailbacks.

I suggest the location of this sports facility will only exacerbate this problem?

Please, please, please do not consider traffic lights on the roundabout, to try and mitigate this inevitable problem. Traffic lights will only make the traffic problem worse. Please use the Gapton-Hall roundabout in Gt.Yarmouth as a classic example of disastrous traffic management after adding traffic lights.

Attached documents
### Gisleham Parish Council Derek Ward

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>1109</td>
</tr>
<tr>
<td>Comment</td>
<td>The vision summary has several key points, including the following:</td>
</tr>
<tr>
<td></td>
<td>* Improve quality of life</td>
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<tr>
<td></td>
<td>* Improve health of the population</td>
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<tr>
<td></td>
<td>* Protect and enhance the environment</td>
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<td></td>
<td>Taking these into consideration, we observe that WLP2.18 has been proposed for the use of tennis, netball and athletics. Within Lowestoft, there are several underused sports facilities, where with minimal investment such proposed elements could be created, for example the Oval on the North Denes. Improving this facility would encourage regeneration of the north beach area and would tie in with the Ness Point Park proposal.</td>
</tr>
<tr>
<td></td>
<td>We feel WLP2.18 and 179 are the most suitable areas for housing development to the west of the town. The proximity of Castleton Avenue and Beccles Road would allow for greater access to the primary road networks making Lowestoft, Yarmouth, Beccles and Norwich convenient for commuting or leisure. Public transport links would be far easier to create than the proposed area WLP2.15.</td>
</tr>
</tbody>
</table>

**Attached documents**
**Graham Hunt**

**Section**  
Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

**Comment ID**  
534

**Comment**  
WLP2.18 This area for sports facilities seems more useful again for housing development as it is close to the main road network. It seems very ironic that if anyone wishes to use the sports facilities they have been located on the edge of the settlement rather than a more central location, that would allow far easier access to enjoy the facilities by foot or cycle. With the exciting third river crossing on target perhaps the area to the west of the new bridge on the Jenweld site would be a better option, central and also a second focal point to the town.

**Attached documents**
Historic England

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 1383

Comment Grade II listed house The Rookery is opposite allocation WLP2.18 on Beccles Road. The designated heritage asset is not identified in the policy or supporting text. There is no apparent assessment of impact on the setting and the significance of The Rookery, particularly of the proposed floodlit sporting facilities.

Attached documents
J Kent

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 132

Comment Are you trying to destroy all the countryside of Carlton Colville or just most of it. Carlton Colville is large enough and does not have the infrastructure to support anymore. I can only get 1 mb speed of internet at my home in Carlton Colville but you want to build all of this! How about you focus on improving what is already here. Leave the countryside and fields alone. There is already a football pitch and tennis court in Carlton Colville. We would all prefer the fields and countryside to walk across rather than a flood lite sports center.....

Attached documents
Lowestoft Railway Hockey Club Peter Newnham

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 547

Comment I represent Lowestoft Railway Hockey Club. Along with Lowestoft Ladies Hockey Club we are disappointed to see that the Oakes Farm plan includes provision for a 3G football pitch. The area already has a burgeoning number of such surfaces, though there is only one surface suitable for hockey, located at East Point Academy.

This astroturf surface was laid down in the mid 90’s as a Community Facility. However, over time the ownership and responsibility of the facility has changed and the Inspiration Trust, who now operate East Point Academy, are responsible for it as part of the whole school site. Both hockey Clubs depend on this facility for the continuation and growth of hockey in the area. Both Clubs have plans to continue to attract more youngsters to the sport and are working together with England Hockey and local schools to promote the sport (none of the 4 Lowestoft High Schools currently offer hockey as a curriculum sport, though we are working on this too!).

With EPA now being an Academy, the future of the astroturf facility is uncertain; currently we are finding it difficult to get essential repairs done on the floodlights and are concerned for the future of the pitch, the surface of which in any event, will need replacing within the next 3 - 5 years.

Without the long term security of a suitable hockey facility in the area our current and future plans for the sport are in jeopardy.

Since the playing Playing Pitch Assessment of 2014 was produced, the situation concerning the facility at EPA has changed and the Inspiration Trust could at any time determine other priorities for the whole school complex at EPA.

For these reasons the hockey Clubs strongly urge the local authority to reconsider the plans for Oakes Farm - replace the 3G playing surface proposal for an astro type surface suitable for hockey.
Your response to this comment would be welcome please.

Attached documents
Nicholas Sanderson

Section | Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID | 1160

Comment | Policy WLP2.18: The development of a sporting complex at Oakes Farm is entirely inappropriate. It will urbanise an area of green field rural land with good ecological value, and contribute to the sprawl of Carlton Colville. The increase in traffic will add further strain to the A146 (already an extremely busy road), and any lighting, (particularly flood lighting) will contribute to disturbance to both local people and wildlife.

The Waveney valley, which locally already has 3 sites of a special scientific interest (Carlton Marshes, Barnby Broad and Castle Marshes), and is likely to be further improved by the Suffolk Wildlife Trust from a nature conservation point of view, will be negatively affected by this development from noise, light pollution and traffic disturbance.

As such the development of such facilities will potentially have a major detrimental impact on the fringe of the Broads National Park, and on the wildlife value of this unique area.

Attached documents
Paul Newson

Section  
Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID  
61

Comment  
While I think it's very commendable having the new sports fields centre at Oakes farm I think you have overlooked the fact that most of its land is not very level and also the soil type very heavy and doesn't drain very well and gets water logged which is not ideal for sporting activities.

Would it not be better to put the sports facilities on the land along beccles Road and Burnt hill lane In your consultative document you state you want this land left open it would also abut the golf course which is also a sporting facility and close to the nature reserve which has many footpaths for those wishing to jog would it not be better, just my ideas, but I don't want to see a football pitch and playing field which you will be unable to play because water logging.

Attached documents
Rosemarie Moyce

Section  Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID  42

Comment  I absolutely do not agree with the proposed development at Oakes farm, this would generate a huge amount of traffic along smaller roads leading into Carlton colville, playing facilities can prove very noisy at weekends and evenings, this development is right next to an already busy residential area. The transport museum already generates traffic and parking issues within the Oakes- which is where I live. The traffic along chapel rd is already busy, there are no traffic controls or crossings planned.

Traffic along the Beccles road is already very busy, presumably this development would not go ahead until the third crossing is already established otherwise it would cause further chaos trying to go back and forth through Oulton broad.

I would suggest land in north Lowestoft would be much more appropriate for this use. As it would be more central for everyone to get to.

Additionally The Oakes farm has a right of way, which is frequently used. There are no other open spaces available to local residents. Further development would have more impact on wildlife. When I moved to the area we used to see owls, deer and hedgehogs, now there is no wildlife, this is being pushed further away, or eradicated.

I also note that in order to finance this development land has already been earmarked for residential building. Again why is Carlton colville being targeted for such a huge number of houses? Apart from a new community centre. There is no provision to improve the infrastructure at all. Where will all the additional people register for gps.

I note that there is already sports facilities available at the community centre in Lowestoft, this is very underused? Will this be opened up to the public. What will happen to the land where the existing community centre stands? Also what will happen to the existing school. Will these areas again be up for grabs and more houses built. It is scandalous.
i understand the need for additional houses to be built but this should be shared more evenly across the region and not focussed in one area.

i notice that the old prison site in blundeston is not highlighted as being redeveloped, perhhaps this might be a much more suitable area for such a large sporting facility, access from the -A12 could easily be made.

Attached documents
Sport England Philip Raiswell

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 738

Comment Sport England supports the principle of this development, which was identified as a site to provide new facilities for outdoor sport in the Waveney Playing Pitch Strategy (2015). There is an established need for additional 3G football provision in the district, and the proposed population growth in the Lowestoft area will generate additional demand for sports pitches and other recreational facilities.

With regard to the proposed wording of the policy, Sport England would make the following comments:

* 'Any floodlighting should be low impact'. This statement is vague and misleading. Does it relate to physical impact or lighting impact? The floodlighting for the proposed 3G pitch will need to meet minimum Sport England/FA standards for a facility of this type. We would therefore recommend that this criteria should say 'Floodlighting for the proposed 3G pitch must meet Sport England/NGB minimum luminance requirements for such a facility'. The criteria could also say that hours of use of the floodlighting will need to be controlled via a planning condition, in order to protect residential amenity.

* The site specific criteria should also state that changing facilities should be provided to meet Sport England/FA requirements, and car parking will be provided to meet WDC policy requirements

* Sport England would also recommend that a criteria is added to say that all grass pitches, artificial pitches and courts will be provided to meet Sport England/NGB technical requirements, in order to ensure the new facilities are fit for purpose.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID  1667

Comment  No discharge strategy is evident, soil conditions look sporadic for infiltration, no watercourse, no AW surface water system

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID 1652

Comment Policy 5 of the Minerals Core Strategy safeguards sand and gravel resources identified using data available from the British Geological Survey. The County Council will safeguard any site within the identified minerals consultation area from proposed development in excess of one hectare or areas falling within 250m of sites within the Specific Site Allocation DPD. The following allocations are larger than one hectare and within the consultation area, however this is no reason to prevent the allocation of these sites as the County Council believes it to be unlikely that these sites would be exploited for minerals. The County Council will still need to be consulted as the minerals planning authority if planning applications do come forward on these sites, and would request consideration is given to using some of the on-site mineral resource in any resulting development, to reduce the amount of material transported on and off the site.

• Sports and Leisure Allocation Policy WLP2.18

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

Comment ID  1712

Comment  Sustainable links required including new footway to site frontage on A146
Transport Assessment required

Attached documents
**Suffolk Wildlife Trust James Meyer**

**Section**  
Policy WLP2.18 - Oakes Farm, Beccles Road, Carlton Colville

**Comment ID**  
1258

**Comment**  
This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the requirement for an ecological assessment as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements. This is particularly important as the site contains a County Wildlife Site.

**Attached documents**
Strategy for Beccles and Worlingham

Anthony Howes

Section

Strategy for Beccles and Worlingham

Comment ID 73

Comment

As a resident on the Sir John Baas Park development I am concerned about the increase in traffic on London road as a result of building 250 new homes at WLP3.2. There is only one exit from this development, via Richard Crampton Road, onto London Road, and this can be very difficult at times currently. Unless much consideration to the design of traffic junctions is given, or an additional exit from this development is provided, we could find it almost impossible to exit onto London Road in order to travel towards Beccles Town Center in particular.

Attached documents
Beccles Town Council C Boyne

Section: Strategy for Beccles and Worlingham

Comment ID: 1153

Comment: Beccles Town Council believes that the preferred option set out in the draft WDC Local Plan Strategy for Beccles and Worlingham, which includes the proposed garden village area, is the best option in the plan.

Attached documents
Beccles Town Council C Boyne

Section
Strategy for Beccles and Worlingham

Comment ID
1150

Comment
The number of proposed new homes is inflated due to the affordable housing requirement. Is this level of affordable housing provision needed in Beccles? (35% across Waveney District as a whole). Several comments from the public during council’s consultations underlined the need for this kind of housing. It is considered that the proposed number of new homes is too high.

Priority for both the social and affordable housing should be given to local residents and their relations. Local should mean Beccles and Worlingham first then the rest of Waveney District. This needs to be included explicitly in the policies.

Assessments carried out only when a planning application is made are not considered to be sufficient. Mechanisms need to be in place to trigger assessments after significant building has taken place. Indeed, it needs to cover any significant change in circumstances between the time an application is made and when building actually commences.

WLP1.1 states that, since this area gets 15% of the growth of new homes and 25% of the new employment, then it should get 15% growth in retail and leisure.

However, Beccles is already poorly served by leisure facilities (for example, poor indoor sports, no cinema, lack of youth provision in Beccles North). The council would therefore expect Beccles to attract MORE than 15% in Leisure growth alone.

In respect of retail, the council would like to see provision for one large supermarket serving the south as well as small local shops.

The plan suggests just under 1,500 new homes. It does not detail the preferred mix of these homes. Therefore, some controls need to be built in as, for example, 1,000 5 bedroom properties will bring a significantly different burden than 1,000 1 bedroom properties. It is considered that
there is a need for a higher proportion of 1 to 2 bedroom homes.

Attached documents
Carl Simpson

Section  Strategy for Beccles and Worlingham

Comment ID  760

Comment  The plan suggested seems to have been rushed with no other plans submitted for evaluation by residents. Perhaps several different variations could be provided possibly with a park separating the existing housing and the new the length of Beccles and Worlingham thus giving existing residents a sense of not being hemmed in by new building and giving the benefit of still having country views and not effecting the value of their properties. I and my family feel the building plan could be revise to suit all and except new housing will be built but great thought needs to put in to create what could become a beautiful country housing park for all, not just for some who by paying a premium will gain a great view.

Attached documents
Carol Ryland

Section
Strategy for Beccles and Worlingham

Comment ID
918

Comment
As a local resident I appreciate the development is going to go ahead regardless of how much people object so, rather than objecting I would just like to bring a few concerns to the forefront to be considered in the new plan.

We have lived in Alexander Close for twelve years, one of the main reasons for purchasing the property was because of its location and the reassurance that nothing was being built out the back, which as you know is currently farmland. We have a back gate in our fence that gives use access to beautiful walks and views with our dogs, if this easy access to walk and or cycle ways can be kept this would help with keeping some of our quality of life.

We also have a drainage gully and tree lines before the field starts, again if this privacy could be kept and the pathway maintained we would have some sort of buffer between us and the new housing. At the moment we have privacy, my biggest concern with new properties being built, is the removal of the trees would mean houses would back straight onto our tiny garden and we would be over looked by loads of houses due to then being at a low point.

Also being at the bottom of the farmland hill, drainage is an issue and I fear this will only become worse with the additional housing, at the moment we as a collective group in this corner maintain the grass and drainage gully by regular cutting and clearing. Without this private maintenance and then the additional housing I feel our property would be in greater danger of flooding. So with extra noise, lack of privacy, no access to open space for walking our pets and the added issue of flooding we would be loosing everything we originally purchased the house for and potentially struggle selling not to mention the loss of equity. Please Please take into account our current life styles and reasons for living with our families in the Beccles area.
Kind regards

Carol Ryland

Attached documents
Caroline Topping

Section Strategy for Beccles and Worlingham

Comment ID 442

Comment In my opinion the option recommended by the Officers of WDC is the best chance Beccles and Worlingham have of having 'planned' and 'controlled' development over the next 20 years, as opposed to the ad hoc development that has happened over the last 20. We need the infrastructure that goes with this development and I would like to see controls put in place THAT ENSURE that infrastructure is delivered at specific trigger points through the construction. If the developers do not deliver the infrastructure, the development does not continue.

I would also like to see a mitigation of the impact of the new buildings on those already there. Instead of the country park being one huge area to one side of the site with smaller green spaces scattered in between, which I like, however there are concerns that the new build are going to benefit from all the green space and not the existing houses. Can a green breakway go along the boundary of the existing and new sites, so that the existing houses can also benefit from looking over nice green spaces, rather than looking out onto houses and gardens. This would mitigate some of those existing home owners concerns and make this proposition more attractive to them.

Regards Caroline Topping

Attached documents
Charles Fortt

Section Strategy for Beccles and Worlingham

Comment ID 420

Comment I support the overall strategy for Beccles and Worlingham. I approve the plan to retain the individual identities of the two settlements.

Attached documents
David Harmer

Section  
Strategy for Beccles and Worlingham

Comment ID  
14

Comment  
Personally I have no objection to new build with the following proviso.

The infrastructure to be adequate to support the number of new build. I.E roads; schools; shops; doctors; etc.

Possibly the most important of these numerous aspects of infrastructure is updated sewage systems, many of which are inadequate Victorian structures.

Attached documents
Environment Agency

Section
Strategy for Beccles and Worlingham

Comment ID
869

Comment
We are pleased that the infrastructure plans for Beccles acknowledges the need for improvements at the Beccles water recycling centre. The phasing of development will need to be considered accordingly to ensure that capacity remains at this facility.

Developers should liaise with local water providers regarding this issue.

Attached documents
Frederick Davey

Section Strategy for Beccles and Worlingham

Comment ID 68

Comment This is a massive increase for the area of Beccles. There seems to be no suggestion as to how access from the new area into and out of the town of Beccles is to be provided for these additional residents. Will they be expected to weave their way through the existing residential areas to get to and from the town, This will be dangerous and make life unbearable for people who live in residential areas where the roads are not suitable to carry through traffic.

Attached documents
Graham Catchpole

Section Strategy for Beccles and Worlingham

Comment ID 20

Comment The comments in sections 3.8 and 3.9 give the impression to the casual reader that 1250 homes will be built on the eastern site (Larkfleet). The sites should be separated and the proposed housing numbers should be shown for each site.

In section 3.12 the photograph's of Hampstead are irrelevant, there are numerous streets in Beccles and Worlingham that look the same as these pictures. I do not see how they contribute to this consultation and demonstrate a lack of understanding regarding the existing environment of Beccles and Worlingham.

Comments regarding directing traffic flow to the western approaches to Beccles town centre along London Road again show a lack of research. London Road regularly has traffic tail backs of 400 metres. Cars entering Beccles to park via this route have one small car park to access which is already used to a very high capacity.

Attached documents
Jane Leather

Section Strategy for Beccles and Worlingham

Comment ID 215

Comment We support the decision to discount each of the sites along Ringsfield Road (marked on the Waveney First Draft Local Plan as Nos. 24, 174 and 145). They are unworthy of further consideration due to the valid reasons that have been put forward by Beccles for all three to be discounted and agree that the preferred sites for development are significantly more suitable.

In the evaluation process it has already been identified that Ringsfield Road would be a totally unsuitable access route for the Alternative Site proposal. The part of Ringsfield Road to the Western boundary of the Alternative Sites connects bridleways from Primrose Lane to Cut Throat Lane (Hangman’s Lane) and is regularly used by horse riders, cyclists and walkers. This is a narrow road with a sharp bend and hedges and there is consequently poor vision. A significant increase in volume of traffic would make it even more congested and hazardous for horse riders, cyclists, walkers and motorists.

The Alternative site in question includes Grade II Agricultural Land and it would seem irrational to build on productive agricultural land and lose it to housing for the future. Development of this Alternative site would also bring a significant impact on the rural landscape, long established hedges and wildlife.

Attached documents
Janice Smith

Section  Strategy for Beccles and Worlingham

Comment ID  238

Comment  Why do we need so many houses? We can't keep expanding. There are units already empty around the town. There is no need for more. Where are all these people going to work. I have grandchildren growing up and they will need jobs.
Jennifer Dyer

Section Strategy for Beccles and Worlingham

Comment ID 240

Comment There should not be any large scales development in Beccles and Worlingham.

Attached documents
<table>
<thead>
<tr>
<th>Jim Girdwood</th>
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<tbody>
<tr>
<td><strong>Section</strong></td>
</tr>
<tr>
<td><strong>Comment ID</strong></td>
</tr>
<tr>
<td><strong>Comment</strong></td>
</tr>
<tr>
<td>Jim and Margaret Girdwood</td>
</tr>
</tbody>
</table>

| Attached documents |
John Hill

Section  Strategy for Beccles and Worlingham

Comment ID  218

Comment  The Waveney Local Plan identifies some alternative sites along Ringsfield Road for industrial and housing development. These are sites 24, 174 and 145. We support the council’s decision to discount these sites, for the considered reasons already given and would like to offer some additional validation for rejecting these sites.

The western boundary of these sites, Ringsfield Road, is a narrow road with two 90 degree bends which have poor visibility. We have witnessed a number of near miss collisions at these bends. This section of Ringsfield Road is used frequently by horse riders, dog walkers and cyclists. There would be a significant increase in traffic volume, should these sites be developed, with a far greater probability of traffic accidents.

These sites include valuable Grade II Agricultural land and hedgerows, which provide a natural habitat for a variety of wildlife. These would all be lost were these alternative sites to be developed and the Western approach to Beccles would lose its rural landscape.

Attached documents
John Liddell

Section: Strategy for Beccles and Worlingham

Comment ID: 574

Comment:
Iam in full agreement with the plan for all the new housing proposed for Worlingham.

Without these new houses over the life of the plan we will lose schools and shops.

Their is a small minority who are opposed to the plan, but they have got it so wrong, we need these new houses to keep our shops and schools open and all the many organisations to thrive.

John

Attached documents
Marion Redpath

Section Strategy for Beccles and Worlingham

Comment ID 126

Comment

1. The infrastructure has not been thought through for all these new homes in Beccles and Worlingham. 1,473 new homes means on average 4,500 plus more people. We are already short of 5 doctors with extra people we will need another 2. thats 7 short. When we do get new doctors they dont seem to stay. It can take 3 hours sometimes on the phone to just get an appointment and phone calls are only taken between 8am and 11am. The blood taking department in the hospital is under threat of closure. We have already lost the minor injuries clinic. As for extending the Medical Centre there isnt the room for this. there isnt enough parking now without more cars.

2. Where are the roads going to go to take the people into town. The town is already congested. When we spoke to a planning officer at the Public Hall he didnt know where the roads were going to be. Why not.

3. Who will be buying these houses is wont be people in Beccles. The houses on the market are not selling like hot cakes!!

4. What plans are there for spaces for extra secondary pupils. They cant recruit enough teachers for the existing schools.

5. We have no police station in Beccles and only on call firemen.

6. How many homes in each 5 year period.

7. Have you considered building a new town instead of ruining all the existing towns.

Marion Redpath

Attached documents
Mark Chapman

Section | Strategy for Beccles and Worlingham

Comment ID | 444

Comment | I think the Beccles and Worlingham plan is very well thought out and I like the proposed layout. I am all in favour of it.

Attached documents
Mark Hurren

Section | Strategy for Beccles and Worlingham

Comment ID | 1216

Comment | I am broadly in support of the proposals. The nation needs new homes, there is demand in the local area and this is a sensible location for these properties to be built. I believe that we are a welcoming community, and while every effort should be made to make sure that these new houses are accessible for local people to rent or buy, we should acknowledge the benefits that becoming a slightly larger town will bring in terms of the shops, entertainment and other facilities that will be attracted to the town.

At present, there is a need to travel to Norwich, Great Yarmouth or Lowestoft for many facilities, and the expansion of Beccles and Worlingham means that many such facilities can be replicated here, as there will be the clear demand for such private enterprise to exist.

The land beside the relief road is the most sensible area to build, and the plan includes good spacing and plenty of open spaces - it is important that we avoid a development which has as many houses crammed into the plot as the developer can build.

There should be an appropriate mix of much-needed social housing, and genuinely affordable homes for people to buy. Given local income levels, many homes described as 'affordable' often are anything but, and so there should be sufficient small-sized, terraced housing, that can be made available as cheaply as reasonably possible while maintaining adequate building standards and sufficient housing spacing for the remainder of the development.

I am concerned about the local infrastructure, that in many ways is lacking at the current population level. This is not reason to decline the expansion of Beccles and Worlingham - but it is more important than ever that if this development proceeds that local services are strengthened. I encourage WDC to push for improvements to GP access to the medical centre (now and even more so with further population increase in the area), and to ensure that there are sufficient school places were these new homes to be
It seems sensible as well that a larger town would have its police station and waste disposal site reopened to the public. There has been an increased perception of crime and fly tipping in the town, and the additional tax payers in the town from these new houses would be a good opportunity to make sure that the safety, security and waste disposal facilities are up to scratch.

I urge those designing the road infrastructure, both on the main and other sites and any amendments to aid traffic flow around the town, to at least consider future changes in road use. Over the plan period, it is quite possible that motor vehicle use will change dramatically. The increase in population may well increase vehicle numbers and emissions in the medium term. Over the longer term, if driverless cars enter the mainstream then we need to be prepared for more journeys to take place but for vehicle ownership to potentially reduce. It is well understood that current traffic issues in the town centre are down to town planners over a hundred years ago not planning for the widespread use of the motor car. While they and no one today can accurately predict the future, it is important that consideration is given to such issues, and not just relying upon current traffic surveys to predict the future.

Overall, I look forward to this sensible expansion of our town, and of the benefits that this will bring.
McGregor

Section  Strategy for Beccles and Worlingham

Comment ID  172

Comment  Are there any assurances that social housing will be for local people or will we be absorbing families that other councils cannot house. This would change the integrity of Beccles.

Attached documents
Mrs Hilda Jackson

Section  Strategy for Beccles and Worlingham

Comment ID  593

Comment  In addition to my other comment approving the selected sites I wish to express my approval of the exclusion of site 72 from the proposals. This for three reasons.

1 The access to this site is already congested and difficult with a one way system clogged by roadside parking. Opening access to the site via Worlingham Rd could potentially open up a rat run and therefore best avoided.

2 Leaving the site undeveloped provides opportunity for wildlife habitat to be maintained at the same time as providing welcome green space to the residents of the East side of Beccles.

3 The council’s own policy of prevention of coalescence of settlements would be upheld and contribute to maintaining the integrity of Worlingham.

Attached documents
A Ratcliffe

Section Strategy for Beccles and Worlingham

Comment ID 510

Comment Having attended the public meeting in Blyburgate Hall Beccles I would like to say how good I thought that the first draft plan was for Worlingham and Beccles.
Norman Castleton

Section Strategy for Beccles and Worlingham

Comment ID 264

Comment This is a charter for speculative builders and the degree of housebuilding is not sustainable in a area with declining or over stretched services of every kind. A new southern relief road will not provide these and in fact all the evidence suggests that new roads are also environmentally unsustainable. Building on open green field sites whatever their degree of landscape quality or agricultural grade is also not environmentally sustainable. Plan for the maintenance of environmental quality not some perceived and rather vague notion of growth. Populations will not go on growing nor will the ability of the natural environment to go on absorbing more and more urbanisation.

Attached documents
R Barnard

Section                      Strategy for Beccles and Worlingham

Comment ID                  501

Comment                     Have looked at the suggestion of the Green Party. It appears very positive + practical. Let Beccles show the way: for proper development for now: + the future: We can do this.

Attached documents
**Richard Smith**

**Section**  Strategy for Beccles and Worlingham

**Comment ID**  230

**Comment**  1,400 odd houses in the local area is not needed - around 400 houses (new homes) is all that is needed – so does this mean an influx of people from elsewhere. What jobs are available for them?

**Attached documents**
Rosemary Hewlett

Section Strategy for Beccles and Worlingham

Comment ID 133

Comment If you were to go with Option 2, I have concerns about No. 72. I have already raised this issue when responding to the Larkfleet consultation. Part of this land belongs to the Beccles Fenland Charitable Trust and has not been put forward for development and would need a consultation with the public and the Charity Commission before any decisions could be made on that. Likewise, in the pullout that appeared in the Beccles and Bungay Journal in August, I see you state making improvements to the Quay. This land is currently in dispute of ownership and until that is sorted I do not see you can make any decisions regarding it.

Attached documents
S J Williams

Section  Strategy for Beccles and Worlingham

Comment ID  340

Comment  I have seen the proposals laid out in your Key Infrastructure improvements in the local press and have the following comments to make:-

1. Beccles is a Market Town and Worlingham is a village. We are separate and do not consider that it would be beneficial to join the two together.

2. The Southern Relief Road was approved to keep HGV vehicles out of Beccles and Worlingham. The current infrastructure must be unable to cope with the increased volume of traffic. As a result of this road now under construction it would appear that developers want to build on this neighbouring land thus seeking access to and egress from the Southern Relief Road which will ultimately necessitate any increased speed limit on that road having to be reduced to 30 miles per hour.

Attached documents
South Norfolk District Council Adam Nicholls

Section Strategy for Beccles and Worlingham

Comment ID 1590

Comment

• South Norfolk Council is broadly supportive of the strategy for Beccles and Worlingham. It is pleasing to see that the Local Plan seeks to plan for development in a more strategic way to ensure a greater range of infrastructure and services are provided to support the growth.

• New employment development to help make Beccles and Worlingham more self-sufficient is also welcomed, although there are concerns about how much of the land allocated at Ellough can come forward in the plan period due to electricity supply constraints.

• The focus on housing and employment development to the south of the town to accompany the Southern Relief Road seems sensible and the development of the housing using garden city principles should make for a pleasing development.

• The proposed strategy should help improve the offer of Beccles for surrounding rural settlements including those in South Norfolk. The Council is pleased to see that a number of infrastructure improvements are planned alongside the new development such as an extension to Beccles Medical Centre, improvement to library provision, a new community centre, new country park, new sport and play facilities and improvements to utilities as these will all have benefits for the rural villages in South Norfolk that look to Beccles for their day-to-day needs.

Attached documents
Steve Lightfoot

Section  Strategy for Beccles and Worlingham

Comment ID  609

Comment  I totally understand the need for more housing but fear that the houses will be built without the promised infrastructure and facilities. Before and houses are built, the health centre extension must be completed and staffed. All too often developers build and sell the properties and then claimntk gave run out of money for the whole project to be completed. What about the high school, town centre parking, access to tesco and Morrisons supermarkets. How long before residents of the new properties complain about the noise and smell from v c cooks site, forcing them to move. Just too much development for the town to cope with

Attached documents
Susan Doherty

Section | Strategy for Beccles and Worlingham

Comment ID | 799

Comment

I would like to object to the proposed massive development in Beccles and Worlingham as part of Waveney District Council’s New Local Plan (Page 48).

I now list my objections to these plans on the grounds of NO infrastructure.

1. Police - Because of cutbacks we no longer have a viable police presence in Beccles or surrounding areas, no night cover and crime is rising. This was highlighted at a meeting on 14th September 2017 with the PCC Tim Passmore who apologised to those who had been badly let down by the service but had no answers to the future policing of Suffolk. With more cutbacks in sight and only one policeman and two PCSO’s for the whole of our area, many crimes are going unanswered and our safety is being compromised. The proposed influx of over two thousand plus more people puts an unmeasurable pressure on an already broken system.

2. Doctors - Beccles Health Centre is struggling due to NHS savings, our minor injuries unit has been closed. This was vital to the town. Doctors are leaving our practice, and on many days we are down to just one doctor and patients are asked to return on another day. How can all these extra households you intend bringing here expect to get proper health treatment whilst existing residents cannot? Again the public are being put in danger. There is no point in building a new health centre when there are no doctors to go in it. Dentists are facing a similar plight.

3. Sewerage - The present sewerage-plant is-now not fit for purpose because of already excessive pressure from current housebuilding, and in times of rainfall overflowing is not uncommon. This has been admitted by the planning representatives who know of the problem but said it was a matter for Anglian Water and their responsibility. WDC councillors have also voiced concerns over this environmental dilemma. I would hope any new drains will not be linked into the old ones. This also goes for surface water drains, the existing ones will not sustain any more pressure.
Plots 145, 43, 156, 24, and 108 surface water will no doubt be directed into the main storm drain which runs, from M and H plastics, under the railway line at Gosford Road, through to the lagoon at Morrisons and eventually to the river. Should this be the case, the heightening of this gully will be essential, as the last time this was done was during the 1960's. This is Anglian Water's responsibility.

4. Traffic - Beccles is a little market town with very narrow roads. Parking is difficult and traffic soon builds up with engines giving off dangerous pollutants. This town cannot sustain the impact of more vehicles when the Government is telling us how unhealthy the inhalation of these fumes are.

Site number 72 needs to be looked at again as part of this is Charity Land, something Beccles Town Council did explain to WDC. Have planners been notified of this?

To summarise.

Sustainable development sits at the heart of the new framework and sends a strong signal to all involved in the planning process to plan positively for sustainable development "through their local plan." Beccles cannot sustain any more building, our amenities are shrinking. Further cutbacks in 2018/19 will only exacerbate the situation.

Decisions from the Court of Appeal, the second highest court in the land, and the Secretary of State for Communities and Local Government relating to developments last year (2015/16) suggested "concerns over sustainability of a community from development can outweigh the benefits of satisfying a five year land supply." Housing deficit regularly take priority over other issues!

Senior Planning Officers should know about an appeal. If they do and have not acted, are councillors being misled? If this is the case someone is guilty of NOT EXECUTING THEIR CLEAR DUTY OF CARE to the public.

My concerns are genuine. Houses for the young, local and single people are needed. It is the volume this plan and its' sites which are unreasonable, and not within commonsensical thinking without growth in our infrastructure.

Attached documents
vic mac

Section Strategy for Beccles and Worlingham

Comment ID 377

Comment I would like to object strongly for the proposed development for Worlingham. It is huge and totally unsustainable for the area. The bypass is being built to bypass Beccles not to be used an infill boundary. Looking across the field at the cleared area it is evident what an eyesore the new estate will be on the country side . It looks devastated.

My son is having to pay a high rate of rent in Beccles when he would prefer to live in Worlingham. However prices are high, but Larkfleet will not commit to real life affordable housing- their version of affordable will be out of reach for minimum wage local people. Having attended both consultation presentations there is nothing to see other than rich people making money, and providing builders with with short term work but the local people with long term devastation. They have no concern for the local people and the effect it will have on their lives, more traffic, environmental impact, strain on services. No school will be built, old people houses only if an outside agency takes it on and no improvement to the sewer system other than a larger pipe down Marsh Lane. The sewage works already seem to be struggling if the stench lately has been anything to go by, but there are no plans to improve it according to the developers as there is no need. Oh and yes it would cost extra money.!

The plan is ill thought out - whoever thought about a new estate in Northcove/ Barnby when that road is a death trap already - so lets add a few more people trying to access it!

Doubling the size of the village will be a disaster - not just environmentally, but for the doctors , schools, and the roads in the local area. I see little gain for the people who really need housing- check Rightmove - no semi detached houses for couples with a family starting out- just mid range / high price which are not selling! What about the empty homes in the Waveney area surely a first point of call would be compulsory purchase of these and preserve our countryside.
Refer to the local Worlingham plan and see what the villagers think we really need! Please think carefully before subject

Attached documents
Wendy Summerfield

Section

Strategy for Beccles and Worlingham

Comment ID

805

Comment

I understood that this public consultation is regarding the sites to be chosen as development sites within the Local Plan, though it would seem that it is a foregone conclusion that this huge swathe of land in Beccles and Worlingham, your preferred site, will be deemed a strategic site at the end of this consultation. I personally don’t think it should be deemed a strategic site and that the development should be spread across the area. I am sceptical that a local plan will have enough weight to prevent unscrupulous developer/s from demanding more dense housing and less infrastructure and facilities. I understand that this Garden City/Village will deliver what the Planners have been asked for but am not sure it will deliver what is needed by Beccles, Worlingham and Waveney as a whole. The medieval road system can’t cope now. The sewerage system can’t cope now. The police have moved out of Beccles and crime is rising now. The GP surgery is at breaking point now.

From experience in Worlingham we know that developers won’t build a shop or a Community centre but will, and have said, here is that land get on with it. (Persimmon on the Werel’s Loke estate)

We know there is no money in the pot so how will the Education Authority pay for a new school, more teachers and more running costs from an already empty purse?

I think this Garden Village is a poor decision, when the initial consultation was made it was decided not to create a new settlement of about 2000 houses in Waveney as there was nowhere with the infrastructure for it. I believe that this will just be that new settlement stuffed in Beccles, Worlingham and Weston, still without the infrastructure. It will destroy the Village of Worlingham which will be subsumed into Beccles Town.
Attached documents
Worlingham Neighbourhood Planning Team Wendy Summerfield

Wendy Summerfield

Section  Strategy for Beccles and Worlingham

Comment ID  924

Comment  Please find attached the response the the Beccles and Worlingham part of the Emerging Local plan for Waveney district council from the Worlingham Neighbourhood Plan team. We look forward to working with you on the plan in the future.

Worthingham Neighbourhood Plan Team's response to the draft Waveney New Local Plan.

The recently published draft New Local Plan (NLP) has clearly involved an enormous amount of work for WDC Planning. For the public, there is a large amount of information to be digested. The Worlingham Neighbourhood Plan (W-NP) team has considered the most salient facts relating to Worlingham Parish and sets out below its feedback to the consultation exercise.

The strategic status of policy proposals has been noted. Whilst certain proposed polices directed towards Worlingham and the close by market town of Beccles cause considerable concern, the statement (in section 3.1) that "... the Council will seek to retain the individual identities of the two settlements" is very welcome and seen as essential to the gaining of local support for a neighbourhood plan to be shaped by the finalised NLP policies.

The key proposed policy, WLP3.1, outlines a new estate on land in the southern parts of Beccles and Worlingham, comprising the sites 81, 8, 9, and 82 as listed¹ in the 2016 consultation exercise, plus a triangular plot bridging the sites 9 and 82. This development is to be of mixed use including residential development, employment development, primary school, country park, sports fields, allotments, play areas, retail and community centre.

In the draft NLP document entitled "Frequently Asked Questions", under
the question heading "On the draft masterplan, approximately how many homes are in Worlingham and how many in Beccles?", the breakdown is shown as: 400 in Worlingham Parish; 120 in Weston Parish; and 730 in Beccles.

We note the above breakdown sums as 1,250 homes, so assume the answer given is actually limited to the dwellings associated with the development under WLP3.1 (otherwise, the total for Beccles should be 980, i.e. including the 250 homes associated with Policy WLP3.2). WDC should make clearer the number of new homes allocated to Beccles in the "Frequently Asked Questions" document.

Of the 1,250 homes identified with WLP3.1, WDC has stated in paragraph 3.9 of the draft NLP that 1,100 will be delivered during this plan period. Therefore, Policy WLP3.1, Bullet point 1 should be amended to read, "Up to 1,250 new dwellings, with up to 1,100 dwellings delivered during the plan period."

a) Numbers of dwellings under Policy WLP3.1.

Question 17 in the Worlingham Household Questionnaire² (conducted in November 2016 for residents aged 11-years and older) probed the total level of development to 2036 that would cause concern. This question was answered by 950 people, of whom 115 had no opinion. The accumulative percentage totals (of these 950 respondents) for concern at future housing development are 53.8% for 201 to 300 dwellings, 62.5% for 301 to 400 dwellings, and 73.3% for 401 to 500 dwellings. From interpolation, it seems reasonable to posit the likely concern level for 400 dwellings (as in WLP3.1) as around 68%.

Given that actual growth includes built and approved windfall (a minimum of 23 dwellings post-2014), the emerging NLP would see the village grow by about 423 (minimum) over the period 2014-2036 (or about 26.3%).

There is broad local acceptance of the need for significant levels of housing development. (A housing study³ undertaken prior to the publishing of the draft NLP has assisted in the community's acceptance of this reality.)

Nonetheless, the 400 homes under WLP3.1 may prove a stretch for gaining local support. Certainly, an increase above this number would seemingly risk there being profound resentment at the imposition of an entity that would be so disproportionate to the needs of the community as to undermine the parish's character and identity.
Therefore, firm confirmation from WDC of the housing allocation will be pivotal to development of a Neighbourhood Plan that can win community support.

The "Frequently Asked Questions" document accompanying the draft NLP includes, in the introductory section, the statement: "By not planning for this growth there is also a greater risk that housing developments could be built in inappropriate locations". The WNP-Team would welcome close contact with WDC Planning as Policy WLP3.1 consolidates. We fear the potential for developers (using financial and legal "muscle") to attempt overdevelopment.

b) Layout of the developments under Policy WLP3.1.

Question 26 in the Household Questionnaire asked, "In order to maintain the identity of the village, should there be green open space that clearly defines the boundaries?" This was answered by 962 people of whom 867 (90.1%) responded "Yes".

Paragraph 3.18 of the draft NLP states that "Neighbourhood Plans for Beccles, Worlingham and Ellough can play a role in shaping the detailed design of development in this area, promoting local distinctiveness". This paragraph should say more about what the Neighbourhood Plans for Worlingham, Beccles and Ellough can do to shape the development. It should not only refer to design but also to community infrastructure, walking and cycling accessibility (including for mobility-impaired users), employment space needs and open space/landscaping.

A starting point would be to show the parish boundaries on the indicative masterplan (Figure (14) in the draft NLP). Because of the absence of the location of the parish boundary (and, therefore, the NP boundary), it needs to be checked that the residential "segment" to the immediate west of the indicated sports field would not overlap this boundary. If this is the case, some adjustment of the housing layout should be attempted.

As far as one can discern, the larger of the two residential "segments" shown as lying wholly within Worlingham would only have a greenway path separating it from those of Beccles. The overall impression is that a chunk of Worlingham Parish being annexed into the south ward of Beccles. There is a risk its residents would not identify with Worlingham.

Perhaps this situation could be improved by adjusting eastwards (by, say, about twenty metres) that upper housing segment ("blob") of the development. Cues in the form of estate/street signage would also help
(e.g. as in the street name "Worlingham Park Drive"). However, an alternative, improved layout may be possible such as that in the figure on page 3 of the attachment, which shows this upper segment of housing rotated through 90 degrees and moved to the east of the site. This would still provide large entrances to the Country Park from the east, but open up the views on to the park from the other directions and offer improved ease of access from those directions. Linkage of the moved housing segment to the Ellough Road would involve a vehicular access arrangement in conflict with the second bullet point in the second set of bullet points under Policy WLP3.1. The implications of such a change would require study in relation to the assumptions underlying the wider traffic concept for the Garden Neighbourhood scheme.

The current masterplan figure (Figure (14) in the draft NLP) is also vague in regard to the sensitive boundary with the existing Bluebell Way estate. Landscaping will be necessary to provide a sense of privacy and security to residents of this estate. There should be consultation with the community in regard to the most acceptable form and placement of screening plants, taking into account needs for boundary (e.g. fence) upkeep and implications for natural light (e.g. on to gardens and conservatories) and commitments be provided about the maintenance of such landscaping. (Note: In the Household Questionnaire², 94.1% of the 952 respondents replied Yes to "Is it important for landscaping to be provided so that developments blend in with the surrounding countryside?") Native thorny shrubs such as hawthorn and blackthorn, which provide food and shelter for birds and small creatures, may be a solution.

Question (20) in the Household Questionnaire² – "Should new developments of about 20 houses or more have grassed and tree-lined 'open breaks' surrounding them to avoid the perception of over development and to potentially support the development of linked wildlife corridors?" – elicited a 92% Yes answer from the 984 respondents. This feedback should be reflected in the way the separate housing segments are landscaped and blended with the park setting.

The final sentence of Policy WLP3.1 should read, "A detailed masterplan based on the indicative masterplan in Figure 14 above (Note: for clarity, this refers to the figure in the draft NLP, not the figure on this page) should be prepared in consultation with the community, preferably through any Neighbourhood Plans in preparation, and submitted as part of any planning application."

We see it as essential that the W-NP team is fully involved as the emerging
New Local Plan progresses through all its stages in order to represent our recommendations.

c) Affordable housing provision.

Policy WLP8.2 provisionally continues to set a requirement of 35% "affordable housing". Early clarity concerning the distribution and nature of affordable housing across the broader proposed WLP3.1 development will be welcome. In the meantime, we will assume about 140 affordable homes (i.e. 0.35 x 400) would be allocated to Worlingham, and about 298 spread across Beccles' and Weston’s parts of the proposed development.

Policy WLP8.2 requires affordable homes to be of a design standard which makes them indistinguishable from the market housing on the site is welcomed to promote social cohesion, particularly in the context of the massive scale of the overall proposed development covered by Policy WLP3.1.

d) Site suitability.

We continue to have concerns about the suitability of much of site 82 for residential development because of intermittent wind-blown odours from the industrial estates and the proximity to the new bypass and its traffic. It is not clear people will be prepared to buy/live there, particularly in the southeastern quadrant, unless obliged to in the form of social housing. Is that what WDC intends?

The proposed office development on the extremity of the site will use up a bit of this land, but it will not eliminate negative perceptions. Even the suitability of the indicated location of a new primary school might be considered questionable from the odour viewpoint. (More generally, it is assumed the site’s overall drainage issues can indeed be addressed without causing problems to the surrounding area.)

e) The nature of housing.

There would seem to be general consistency between the findings in Part 2 of the latest Strategic Housing Market Assessment⁴ and Part C (Housing characterisation for future development) of the Housing Needs Assessment⁴ at neighbourhood plan level regarding types and sizes of accommodation likely to be required. Given that the starting point (e.g. the existing housing mix) in Worlingham differs from that for Waveney as a whole, it is hoped the content of Part C of the latter document is consulted during the onward planning by WDC.
Section 3.10 of the draft NLP refers to the opportunity to deliver a retirement community comprising a care home and a proportion of extra care and/or sheltered dwellings. We suggest consideration is also given to market-based retirement provision for people wishing to downsize into a safe community environment. Unfortunately the latter sector is currently experiencing criticism for its pricing of units, with instances of dramatic price falls upon reselling. Nonetheless, we think there may be local interest growing for this type of dwelling delivery. (Note: Question (9) in the Household Questionnaire² asked "Do you think there should be more sheltered or retirement community accommodation, extending and improving the options for the independent living of older resident?" 807 respondents (84%) answered "Yes".)

Without being prescriptive as to the forms of market provision for this sector, we would like to see the second bullet point in Policy WLP3.1 amended to "Retirement community comprising a care home/nursing home, extra care and/or sheltered dwellings and market housing to address the needs of older people."

In regard to building design, we have not had time to consider the implications of the "Garden Neighbourhood" concept. There would seem to be an aspiration on the part of WDC to create something new, whilst hitherto the W-NP Team has been working to characterise the existing village setting and built environment. It is important that a balance can be achieved that doesn't create a sense of fundamental separation between the extant and new estates, undermining the development of cohesion. Under Policy WLP3.1, there should be an additional bullet point added to the second set of bullet points as: "Development shall be designed to ensure that it is in keeping with the character of Worlingham and Beccles."

f) Public realm and open space.

Part of the Vision⁵ for the Worlingham NP is "... It has retained its identity as being distinct from Beccles, the local market town, by preserving its natural, countrified setting of mature trees and hedgerows, which date back to its origins within Worlingham Hall garden estate together with replicating these rural features into all new developments..." Further familiarisation surrounding the "Garden Neighbourhood" concept as it could be implemented in the village context is required by us, but the above part of the W-NP Vision seems amenable to such an approach.

g) Pace of development.

Delivery of housing to meet local needs would be negated by a rush to
build. The concern is that developers’ goals and policy constraints (e.g. management of a 5-year land supply) on the District Council may override sustainable development for the community as the latter evolves over the period to 2036. The worst case would be where all of the proposed 400 dwellings for Worlingham are built within the first half of the plan period 2014-2036 (e.g. by 2025). Ideally, some kind of phased development should be sought, acknowledging the projected demographic changes in the age profile for Waveney communities. (See, for illustration, figure (15) in the Housing Needs Assessment³ at neighbourhood plan level.)

Given the scale of development intended across the two settlements, it is hoped there will be sufficient phasing flexibility to ensure Worlingham isn’t treated as a "quick hit".

h) Community concerns.

Perhaps the greatest general concerns relate to the implications for the future capacity of the Medical Centre and for traffic flows in, through and around Beccles and Worlingham.

There will be a point where a town or village becomes so bloated it no longer functions as it has in the past. The fear is the area will become the bottleneck to The Broads as opposed to being the gateway to The Broads.

Many local residents work in other settlements. It is to be hoped the needs of key employers will be sought and taken into account, e.g. in relation to any logistical (such as the transport of goods) sensitivities, in the context of the wider plan for the District.

Worlingham Neighbourhood Plan Workgroup (20 September 2017)

References.

1. Options for the new Waveney Local Plan (April 2016).

2. Worlingham Neighbourhood Plan Questionnaire (for residents aged 11-years and older), distributed to all households in the parish in November 2016.


4. Strategic Housing Market Assessment Volume 2 (May 2017) by HDH Planning and Development Ltd.

(file version 070617).

Beccles and Worlingham Infrastructure

Anne Bertram

Section  
Beccles and Worlingham Infrastructure

Comment ID  
199

Comment  
GP provision inadequate now & it is essential another medical centre is provided for the large development planning for Worlingham.

Primary school should be built at the start of building work on large development

Will secondary schools be able to cope – these must be Beccles/Worlingham based.

If you hope to encourage young families to move to this area, education and nursery provision are of high priority.

Consider making plans for car-free areas in town and ensure public transport is increased to encourage people to leave cars at home & make a cleaner and quieter environment within the town.

Attached documents
Anne Bertram

Section
Beccles and Worlingham Infrastructure

Comment ID
202

Comment
What about social housing provision – desperate need for people unable to afford to buy or rent privately.

Attached documents
Anonymous

Section Beccles and Worlingham Infrastructure

Comment ID 351

Comment Beccles traffic comes to a standstill every morning during term time. Too much traffic already. Medical centre cannot cope now. How will it cope with up to 1250 houses to the south. Where is the employment? Sewage system can't cope. I see access is now on s-bypass still problem with Ellough Rd with cars getting to supermarkets. Problem of deliveries in town now bus services cannot get through. This number of houses will destroy Worlingham – secondary school provision? None. So where do the children go to school. This number of houses is ludicrous.

Attached documents
### Anonymous

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<td>Comment</td>
<td>No room. No parking. No jobs. No doctors. People making these decisions know nothing about Beccles so but out!</td>
</tr>
</tbody>
</table>

**Attached documents**
Anonymous

Section Beccles and Worlingham Infrastructure

Comment ID 216

Comment When I moved to the newly built Persimmon site in Worlingham, there were promises of a local shop, childrens play area, community centre – none were built – empty promises.

The Beccles healthcare cannot cope now! They cannot get the required doctors!

Our local town roads are already chocked – and please don’t say there will be the use of community transport e.g. buses – they won’t use them.

Be prepared – you have a fight on!

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section
Beccles and Worlingham Infrastructure

Comment ID
1016

Comment
Welcome inclusion of:

* Cycle link to the Ellough industrial estates over land allocated as the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1)

* Improvements to the cycle network as identified in the Waveney Cycle Strategy

BBCS suggests that the cycle link to the Ellough Industrial Estates should be extended from the Beccles Southern Relief Road along Benacre Road and Copland Way to Anson Way and the Beccles Business Park.

Attached documents
Beccles Society Paul Fletcher

Section  Beccles and Worlingham Infrastructure

Comment ID  681

Comment  Much local concern has been expressed about the existing lack of doctors and the need for more health facilities.

The proposal is to extend the existing Health Centre, presumably funded from the Community Infrastructure Levy. If it is extended, how will the CCG guarantee to provide more doctors (and maintain their number) bearing in mind that they are Revenue funded and not Capital funded. We appreciate that there is a national shortage of doctors but it seems to be particularly acute in rural areas. We would therefore request that further negotiations take place with the CCG in respect of attracting more doctors and medical staff to cover for an increased population.

In addition the car parks for both the health centre and the hospital are full most of the day at present. How will extending the health centre provide for extra car parking spaces?

Although comments relating to the police force are hardly a planning matter, we are concerned that the proposed development will put further stress on an already limited police service. There have not been any visible police officers on the streets of Beccles for a number of years, though we have had on occasions community officers, albeit that their authority is limited and they have no powers of arrest.

The Statutory Undertakers pose another problem, in so far as they presumably fund their own improvements when they consider them necessary although their timescale may differ from that which we require. We are concerned about future water resources (particularly with global warming) but Essex and Suffolk Water have published long term plans showing security of supply up to 2040.

Attached documents
Beccles Town Council C Boyne

Section

Beccles and Worlingham Infrastructure

Comment ID

1149

Comment

Council agrees with the need for local employment and is keen to ensure that the Ellough Business Park retains its Enterprise Zone designation and that it receives a much needed upgrade to its electricity supply.

Attached documents
Beccles Town Council C Boyne

Section
Beccles and Worlingham Infrastructure

Comment ID
1147

Comment
During consultations with the town’s electorate, it was clear that their main concerns (which council agrees with) are the provision of health services, traffic issues and that homes are reserved for local people rather than a massive influx from outside the area.

The current health centre is overloaded. No development should be permitted until there is sufficient provision for doctors and dentists to support the population. A clause should be added to the policies WLP3.1 and WLP3.2 to review the local health provision before any planning application is approved. The council considers that the provision of an additional health centre is an essential requirement of any new, large scale development in the Beccles area.

The plan has made assumptions regarding the change in traffic movement due to the new relief road. Once a reasonable period of time has elapsed after the new relief road has opened, the assumptions in the plan should be checked by carrying out a new traffic survey.

Attached documents
Brian Smith

Section  
Beccles and Worlingham Infrastructure

Comment ID  
227

Comment  
[Beccles]

Parking – Beccles town is full /overloaded with cars trying to park.

Doctors – wait ages for an appointment.

Hospital – wait ages for an appointment.

Dentist – wait ages for an appointment.

Attached documents
Carol & Mark Fisher

Section Beccles and Worlingham Infrastructure

Comment ID 157

Comment If we extend the practice we desperately need more doctors – how do we get them?

Attached documents
Carol & Mark Fisher

Section Beccles and Worlingham Infrastructure

Comment ID 154

Comment Please link up the cycle path / footpath so that it is beside Ellough Road from the Cedar Drive estate so that anyone working on the Industrial Estate can ride safely to work.

Attached documents
Carol & Mark Fisher

Section  Beccles and Worlingham Infrastructure

Comment ID  152

Comment  We have lived in Annandale Drive for over 20 years. We occasionally have problems regarding supply of water. This is mainly black sooty residue when supply is high. This came about after more homes such as the Bluebell Way and other estates were built. Our bungalow is on the end of the supply. The water company now comes and flushes this out every month.

As regards to sewage we have no problems but some on Coney Hill were faced with raw sewage on their lawn a few years ago this has now been resolved as new drainage has been put in. I would not like there to be a knock on effect again as the new houses built are on high ground. It would mean pumping up to this so would need large pipes etc.
Charles Fortt

Section Beccles and Worlingham Infrastructure

Comment ID 421

Comment Beccles and Worlingham are well placed to provide sports and outdoor leisure facilities. Some of Beccles' sports facilities were provided by employers who have declined or gone. These should be upgraded or replaced.

Attached documents
Colin Blunn

Section
Beccles and Worlingham Infrastructure

Comment ID
207

Comment
[WLP7.19/WLP7.20] Beccles doctors can't cope now and with all the new homes you are looking at they will not cope then as they are 5/6 doctors short now and another one is going part time so there is no chance seeing them.

With over 1000 homes you are looking where is the work and all what goes with it?

Attached documents
Donna Lowman

Section
Beccles and Worlingham Infrastructure

Comment ID
319

Comment
Our local Doctors, Dentist, schools, roads, police, fire brigade and home owners are going to feel the strain if around another four to five thousand residents are moved in....

You state in your PLAN that that Beccles Medical Center will be extended... but you don't know how ( I asked your planning officer at meeting who did not have an answer as it was not down to the planning department to look at these issues) Where firstly are you going extend....

Secondly where are the Doctors going to come from ( this surgery is already 5 Doctors short) What incentive are you going offer to get new Doctors and how much is this going cost the local residents...

It is hard enough to get an appointment now without the new residents so after new houses built we will not be able to get an appointment at all.

We have lost minor injuries and there is a good chance we are going lose our blood department..

We have also lost minor operations and beds in the hospital...

I see this as going backwards not forwards....

What about Dentists? Our dentists are all full with NO vacancies so what happens about new residents?

Also what about our police force? More people, more crime and we Don’t have a police force as the council has cut costs ( well someone made the decision to reduce our police force)

Our fire brigade are retained so again are we going get our fire service restored?

As for the roads... our roads and paths are not in good condition and are not maintained ..... do we get an improvement in road maintenance....?
We lost our tip and you make the residents pay in Beccles and Worlingham (though Lowestoft has a free tip.. well not free cause residents pay for it out of their taxes.. oh silly me Beccles/ Worlingham residents still pay) Then on top of this you deemed it acceptable to charge residents to have green bin emptied after you had taken away our tip...

We also have our street lights turned off at midnight making it (in my opinion) dangerous for residents...

You state you are building a new primary school, you have only just knocked one down!!!!!!!!!

Also you build a new primary school, what high school do they then move onto? Sir John leman is full and it is my belief that they struggle to employ teachers.. How are you going to get teachers for a full new primary school when we seem to have a teachers shortage?

Also where are these teachers going to live cause I know they will not be able to buy one of your new affordable houses, when I asked exactly "what is an affordable house " your planning person did not have a clue, this was not his problem....

My son is a primary school teacher and I know for a fact then he could not afford anything over 100 k and live and pay back a huge loan caused by going to university ....

Affordable houses.... just a name that does not mean anything....

Attached documents
E A Shakespeare

Section: Beccles and Worlingham Infrastructure

Comment ID: 218

Comment: [WLP3.1] Accepting that nationally we require further homes my objections are as follows.

Where is the access roads into town (not Ellough as conjected already).

Where is the increase in medical facilities.

How are 5000 people going to access the facilities of a small town.

Are there going to be increased leisure facilities.

Where are the extra schools?

What about pollution levels.

Are these homes going to be environmentally built.

Where are the lorries delivering going to access the site.

Etc etc etc

Totally against this amount of houses in one place.

You have a fight on your hands!

Attached documents
Ed Lewis

Section  Beccles and Worlingham Infrastructure

Comment ID  372

Comment  Despite the draft paper being written in "councilees" & only an outline of the extensive plans envisaged I was alarmed at the lack of medical provision. The proposed plan for 1400 new homes will as ,you will be aware will increase the population by 25%. The existing NHS facilities are currently fast becoming inadequate & any increase would surely prove untenable. The surgery is on a restricted site , therefore a new surgery will obviously be required & the existing facility retained. I am convinced this essential problem has been solved but I could not detect it's presence in the paperwork I received.

Attached documents
Elaine Snell

Section  Beccles and Worlingham Infrastructure

Comment ID  254

Comment  Many Beccles residents are worried about how our health services will cope with extra patients, when they seem to have difficulty staffing for the existing population. Will we keep our hospital and would there be the possibility of reopening the minor injuries unit? This would obviously be beneficial.

Monday 7th August 2017, I visited the Beccles Library to look at the proposed plans for housing, employment and tourism for the future 20 years.

I took away the newspaper type details, 12 pages of proposed plans. Have your say by the 22nd September.

It seems to be a rush, how long has Beccles waited for the 'Southern Ring Road' and Lowestoft the 'Third Crossing'. We are expected to comment on what could be significant changes to the lives of residents, which once implicated will have far reaching effects.

I understand the need for new houses and for growth, and hope that I would not be classed as a 'NIMBY', however, once these proposed plans have been accepted and passed will that be it? Is it subject to change, adjustments and possible additions to cope with what could happen in the next 20 years?

How will the plan be implemented, what is the time scale, what parcel of land will see the construction of homes first?

These are all important points that affect how we see these proposals and understand all the implications.

Attached documents
Fay Baldry

Section: Beccles and Worlingham Infrastructure

Comment ID: 159

Comment: [Beccles] Will WDC enforce the building of the school and medical centre? Has WDC/SCC set aside or made allowances for the funding of the new school?

Attached documents
G Dix

Section Beccles and Worlingham Infrastructure

Comment ID 225

Comment [WLP3.1] The doctors cannot cope now with the amount of patience they have! So how will they cope with 1000-2000 new homes. The NHS will not pay for a new practice. Schools – who will pay for a new school?

These new homes will not be a positive step for Beccles/Worlingham. Why does this development have to be so big!? Who is going to fund a sports centre? What will happen if no one comes forward to build these extra facilities, will the land be used for more housing?

Attached documents
Glenys Westmacott

Section  Beccles and Worlingham Infrastructure

Comment ID  163

Comment  Medical H.C. extension – shortage of doctors and if the medical centre is extended where will they park. There is already a parking problem at the surgery.

Attached documents
Glenys Westmacott

<table>
<thead>
<tr>
<th>Section</th>
<th>Beccles and Worlingham Infrastructure</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>161</td>
</tr>
<tr>
<td>Comment</td>
<td>Parking problems with so many houses = people coming into Beccles. E.g. to use the supermarkets, no supermarket planned on the new estate.</td>
</tr>
<tr>
<td>Attached documents</td>
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</table>
Graham Gander

Section Beccles and Worthingham Infrastructure

Comment ID 919

Comment [in relation to development proposed at WLP7.17 Ringsfield]

The Impact on the Wider Community, in particular Beccles.

1.) Healthcare in Beccles is currently an issue. It is often days or even weeks before you can get an appointment with a doctor or nurse. On many occasions it is impossible to park in the doctor's carpark. Development in Beccles will require extra healthcare facilities; they are needed now, let alone with the development that you are proposing. When I asked this question I was told that such provision was the domain of the NHS, who work to a five year plan, largely independent of WDC planning, so no guarantee could be given. The only indication was that Beccles Health Centre could be expanded. If this is to be the case, where, because the site is already too crowded? I hope that the proposal would not include changes to Beccles Hospital, which provides an essential service to the community for blood tests, minor injuries, physiotherapy and outpatients. Beccles has an aging population and healthcare is a real issue. It needs to be on the doorstep, public transport is so poor in the area that travel to other hospital sites is not the solution.

2.) Policing is also an issue since the closing of Beccles Police Station. An increase in the population of Beccles will inevitably and unfortunately lead to more crime and therefore the need for a greater police presence. You no longer see a Police Officer in Beccles; illegal parking and the resultant traffic issues is rife, and even without the proposed development there is a local feeling that the community is no longer looked after by the police. When I asked what the proposal was to increase a police presence and, maybe re-open the police station in keeping with a larger community, I was told that it hadn't even been discussed and therefore there were no plans.

3.) I asked what the proposal was to increase car parking in the town, to accommodate the increase in population and the inevitable increase in cars. I was told that there were none. Beccles is currently a thriving small...
town, which is excellent, but it means that there is often an issue with parking, especially at Tesco and in the town car parks. As already described this gives rise to illegal parking which goes un-noticed. It is something that must be acknowledged and dealt with in the Local Plan.

4.) Many of the traffic related issues could be addressed by an improvement to public transport. When I asked the question about an increase to public transport I was told that public transport was privately run and therefore was not addressed in the plan. I find it astonishing that public transport is not part of a local development plan and again leaves you with the conclusion that this is a 'plan' with very little substance.

In conclusion I have to say that we've found this process of consultation on the Waveney First Local Plan to be very poor. It isn't really a plan at all, just a statement of how many houses and where the development is going to take place. It poses many questions for the residents of Beccles, for which there seems to be no answers and even worse, important issues that have not even been discussed. A plan has answers and contingencies to all the key issues, healthcare, policing, traffic, schooling: things that are really important to the community in which you live and when changes are proposed, you want answers to. The situation seems to be made worse by a lack of 'joined up government', where the NHS works to different timescales to Local Government, where key elements of the infrastructure, for example public transport, is totally in the hands of private companies.
Janice Smith

Section Beccles and Worlingham Infrastructure

Comment ID 239

Comment Medical services can't cope as it is 3,000 more people in our town will not work. Schools won't cope. Roads into town are already too busy. Bypass will not help getting into town. We are stretched to the limit already. Parking problems. Where are all of these people going to work? We live in Park Drive and the last estate they built caused some severe flooding near to us.

Attached documents
Jennifer Dyer

Section: Beccles and Worlingham Infrastructure

Comment ID: 241

Comment:

There aren't enough parking spaces in Beccles town centre as it is. With added houses and their associated cars it would become a nightmare. Traffic in Beccles is heavy at present with the development it would just get worse.

The current doctors surgery is understaffed as it is, even if you extended it then there would still not be enough staff to fill the vacancies. Getting an appointment to see the doctor is difficult at present, with more patients it would become almost impossible.

There should not be any large scales development in Beccles and Worlingham.

Attached documents
John White

Section Beccles and Worlingham Infrastructure

Comment ID 557

Comment I have read your business plan for the new development and have asked various questions about the plan, I now have a few more. In your plan you say that there are over 13000 people living in beccles, if you add at least 3000 more it makes over 16000 people in beccles. We have no Police Station to over 16000 people has this been account for. The police station is at Halesworth. (WHY). You closed the Waste Site and Beccles has got bigger and bigger (WHY). You say there will be no upsurge in traffic, the hill going down into beccles to the traffic lights by Betts is bad now if you add 2000 cars from 1300 homes it will be a complete nightmare down that hill, let alone the pollution of the vehicle exhausts. Beccles has in no way got the jobs waiting to be taken up that you say will be coming up. most of the Wind Farm work is completed by foreign companies and foreign workers, and the new bridge at Lowestoft isn't due to be open till 2022 (IF EVER). Don't destroy beccles because of your pipe dream. (BECCLES WILL NEVER FORGIVE YOU)

Attached documents
Josi Horne

Section: Beccles and Worlingham Infrastructure

Comment ID: 180

Comment: Can the local community have a say about the layout of new development on a particular site (i.e. where to put green spaces etc) (and how these can be used)

Attached documents
Leigh Barber

Section: Beccles and Worlingham Infrastructure

Comment ID: 35

Comment:

* 3.6 Infrastructure section. Further stipulation needs to be provided here for reassurance. I do not think anyone can argue with the points, however, before any additional properties are built the critical dependencies need to be identified and be in place. For instance

* Healthcare – Extension to Beccles. This is the only mention of the Health Centre, there should be further expansion on this. For instance parking is poor, it's already over-subscribed and getting an appointment is difficult, increasing the population will not help this. How would the council work the NHS to expand this site, as it is already full, the only option is to identify a new site surely? There doesn’t appear any space for further development or even funding for this, in addition there is a shortage of GP’s which is widely acknowledged, how do you expect adding to the already growing population will help the people to GP ratio which is already stretched?. This is a critical dependency.

* Education – Beccles schools are full, especially the Primary schools. Has a study been done to confirm the current free capacity within the different school sectors – Primary/High therefore leading to what capacity a new school will be required to accommodate? With the average house hold increasing, a potential 1200 houses could lead to an additional 600+ children in the already strained educational system. There is a school is proposed within WLP 3.1, however is this a token offer or are there firm commitments in actually delivering this? There have been new developments before that have gained approval for a school and never actually delivered it. This is a critical dependency.

* The local plan states - There are electricity capacity issues to the east of the town which are limiting the potential for further development at the industrial areas at Ellough. This is where WLP3.1 mainly resides, 1200+ houses, community centre, employment opportunities. What is the plan to rectify the electricity capacity issue prior to allowing building plans to be
approved? – This is a critical dependency

Attached documents
Michael Porter

Section  
Beccles and Worlingham Infrastructure

Comment ID  
237

Comment  
[WLP3.1] Worlingham Ellough Road/London Road will need weight limit for lorries to keep traffic out of town centre. All roads leading into town centre will.

Will they be able to get staff for schools, new dentist doctors surgery.

Roads in town not able to cope with present traffic without all the extra houses etc planned to build roads will need a lot of work to improve flow of traffic down to North Cove etc.

Attached documents
Michelle Golding

Section  
Beccles and Worlingham Infrastructure

Comment ID  
71

Comment  
No mention of a 'park and ride' or 'lorry park' facility to reduce the considerable number of heavy lorries and other traffic that passes through the historic town centre causing untold damage to the conservation area that is such an asset to tourism and the prosperity of the area (something that will increase as the opportunities afforded by the southern relief road are developed.)

Attached documents
Mr & Mrs Cavill

Section
Beccles and Worlingham Infrastructure

Comment ID
233

Comment
[WLP3.2] Will there be sufficient GP surgeries as Beccles Health Centre is struggling now with less doctors.

Transport – bus services are bad along London Road and increased car journeys along that stretch of road will add to pollution so more buses will be needed as a priority.

The new relief road was to take traffic away from London Road into Beccles but this development will increase it.

Schools full at moment so extra places will be needed are new schools going to be built.

Attached documents
Mr & Mrs M J Venn

Section           Beccles and Worlingham Infrastructure

Comment ID       362

Comment           We have lost other amenities – police station, minor injuries units, Worlingham Primary School and now the well attended Phlebotomy Clinic is scheduled for closure. Where is the common sense in these closures when you want to increase the number of people so very locally?

Attached documents
<table>
<thead>
<tr>
<th>McGregor</th>
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</tr>
</tbody>
</table>
McGregor

Section  
Beccles and Worlingham Infrastructure

Comment ID  
169

Comment  
My concern is about the amount and type of lighting that will be installed on the sites. Many areas have been ruined by very tall and bright lights. Lower level lighting would be more appropriate for a market town setting like Beccles.

Attached documents
McGregor

Section  Beccles and Worlingham Infrastructure

Comment ID  178

Comment  Very concerned that fire police and ambulance will have no extra resources to cope with extra demands thus placing all residents in increased risk.

Attached documents
Mr N & Mrs M Godfrey

Section Beccles and Worlingham Infrastructure

Comment ID 222

Comment There already is too much traffic on Ellough Road. Beccles cannot cope with extra volume of traffic. Not enough car parks in Beccles. Not enough doctors in Beccles.

Attached documents
Richard Smith

Section  Beccles and Worlingham Infrastructure

Comment ID  231

Comment  The increase of the numbers proposed will grid lock Beccles. The town is overcrowded already. Traffic jams, parking. Local health centre – insufficient doctors and other health services at this time! How will water (ground, surface & sewerage) be dealt with we are up to capacity. Drains overflow in Park Drive.

The addition of local shops is not enough!

Attached documents
Robert Bertram

Section  
Beccles and Worlingham Infrastructure

Comment ID  
167

Comment  
My only concern to development of the Beccles/Worlingham area is the medical facilities. You talk about extending the medical centre but as a patient of the practice I know that they are short of doctors and do not have enough now.

Attached documents
Rosemary Hewlett

Section
Beccles and Worlingham Infrastructure

Comment ID
743

Comment
With respect to the local plan for the above area I have the following concerns.

Whilst I accept that some new housing and development is needed and has gone on since time immemorial this number of houses for a small market town is far too many for the infrastructure to cope with and would spoil what has always been a pretty and quiet spot to live in or visit. There is already serious traffic congestion and an increase in fumes which cannot be good for anyone's health, especially children. As a wheelchair user I notice this as I'm lower down. The roads and pavements are narrow and already unsuitable for the traffic using them. I heard of a lady being hit by the wing mirror of a lorry last week in Blyburgate. I myself have been hit by a piece of rope dangling from the back of a lorry in the same street and sprayed by some obnoxious liquid oozing from the corner of another. I am also aware of two quite serious accidents in that street in recent years, one a car mounted the pavement and knocked a lady down and another time a child was hit by a bus. If these plans go ahead this is the road which will most likely take the increase in traffic and it simply cannot cope. Are their any plans to pedestrianise more of the town?

Our Health Centre is understaffed at present and cannot fill the vacancies. I understand that you have been in talks with the CCG and the Health Centre and been told a new surgery is not needed. It's needed now, without waiting for another 1,500 new homes to be built. Worlingham has a pharmacy and a couple of doctors positioned there would help alleviate the strain on the Beccles one and help with the parking issues. I sometimes cannot get to the Health Centre without taking a long diversion as cars using the Centre park across the dropped kerb in Priory Road so wheelchair users like myself cannot get there. Listen to the public, they are the ones suffering. We have already lost our minor injuries unit and our phlebotomy department is under threat. East of England Ambulance Service cannot cope at the moment and that will need to cover not just Beccles and
Worlingham future homes but the whole of East Anglia. We have a shortage of dentists too.

I understand there are issues with the sewers. Has all this been taken into account?

If you were to go with Option 2, I have concerns about No. 72. I have already raised this issue when responding to the Larkfleet consultation. Part of this land belongs to the Beccles Fenland Charitable Trust and has not been put forward for development and would need a consultation with the public and the Charity Commission before any decisions could be made on that. Likewise, in the pullout that appeared in the Beccles and Bungay Journal in August, I see you state making improvements to the Quay. This land is currently in dispute of ownership and until that is sorted I do not see you can make any decisions regarding it.

I would also like to know who is going to look after these new parks and play areas you promise since WDC have let everything in Beccles deteriorate to a dreadful state so that some had to close. We lost the Lido and Public Hall. Waveney Meadow came back to us in a deplorable state. Our cemetery is disgusting as is the state of some of our roads re weeds and litter. People in Beccles pay their Council Tax but little seems to be spent on our town any more. It used to be lovely when it was Beccles Borough Council.

Attached documents
Rosemary Simpson

Section  
Beccles and Worlingham Infrastructure

Comment ID  
142

Comment  
[Beccles] What extra provision is there for doctors and hospital etc which is already stretched.

Attached documents
Roy Hammond

Section Beccles and Worlingham Infrastructure

Comment ID 213

Comment The other comment by the advisor was enlarge the health centre what about the traffic in Ingate and St Mary's Road plus we are 3 GPs short now.
S J Williams

Section Beccles and Worlingham Infrastructure

Comment ID 341

Comment I would also question the possibility of an extension to the Beccles Medical Centre as the Medical Centre does not have enough doctors to cope with the number of patients who currently reside in Beccles and Worlingham. How will they cope with another 1250 homes if this plan goes ahead?

Other than in school holidays all the roads into Beccles are gridlocked every morning - how will they cope if this plan succeeds?

Attached documents
Sam Cooper

Section  Beccles and Worlingham Infrastructure

Comment ID  78

Comment  The Southern relief road will not solve any issues of volume of traffic from the Ellough end of the town as all the amenities, surgery and schools are the opposite side. The one way system pushes everyone down ingate and blyburgate. Increasing the houses on ellough will only cause further congestion.
Stephen Bartholomew

Section: Beccles and Worlingham Infrastructure

Comment ID: 1067

Comment:
- The infrastructure of the town can hardly cope with the volume of traffic now, let alone catering for another 5,000 population. Have any of the proposers of this plan tried to drive through Beccles, via Ingate, where at peak times severe delays occur. There is no other sensible option for accessing town from this part of Beccles. At peak times, the Town Centre is also log jammed with traffic. Where are the vehicles going to park? After all the streets in the Town Centre of Beccles were originally designed to cater for the horse and cart. I predict if these proposals are put forward without major infrastructure change the traffic problems will be as bad as those currently experienced in Lowestoft.

- Presently, Beccles Health Centre is "bursting at the seams" with patients due to lack of senior medical staff. How is this going to be solved?

- Employment opportunities are limited within the Beccles area. Are your proposals just creating a commuter town for elsewhere without thought for the local area.

- We believe a downgrading of the proposals are required and more thought required about the major impact such a development would have on the area.
Susan Workman

Section Beccles and Worlingham Infrastructure

Comment ID 235

Comment Where are the doctors coming from.

Extension to Beccles Medical Centre – how?

Traffic down Peddars Lane is terrible now.

Beccles town centre can't cope with traffic now!

How will high school cope?

Over development.

Attached documents
Strategic site allocations in Beccles and Worlingham

Charles Fortt

Section  Strategic site allocations in Beccles and Worlingham

Comment ID  99

Comment  In approving the development policies WLP3.1, WLP3.2 & WLP3.3, I also specifically support the exclusion of site 72 (land north of Lowestoft Road, Worlingham). Site 72 is unsuitable for development as it is an important area of wildlife habitat and militates against the coalescence of settlements, as described in policy WLP8.34.

Attached documents
Leigh Barber

**Section**  
Strategic site allocations in Beccles and Worlingham

**Comment ID**  
36

**Comment**  
WLP 3.1 is too large an area, I live on the edge of site 81 and have no desire for my quality of life to be ruined by the building of new houses. The cut off should stop on site 80. Additionally surface water is an issue on Site 81 as is the noise from M&H plastics

Overall I am not at all happy at the proposal regarding WP3.1. The Southern Relief road was not presented on the premise of enabling Beccles/Worlingham to present further development opportunities, yet coincidentally the plan being approved for this road and the "opportunity" it opens for further development in this local plan seems far too beneficial for those running the council and from the discussions I have had with other local residents they too are not happy.

**Attached documents**
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Alan Summerfield

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 223

Comment This demonstrates complete contempt of the people of Worlingham and particularly the parish council.

You have apparently been planning this for two years in cahoots with a multi million pound development company.

You propose a village hall? Yet the parish a years into a village hall and planning permission has been given already.

Garden development? I worry about a planning department who cannot tell a garden development from a housing estate.

Schools, medical centre? Your development company already proposed that and when questioned admitted there is no money to staff it.

To cap it all your numbers do not add up.

Attached documents
Andrew & Shelia McMahon

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 137

Comment My wife and I are more confident that the layout of access and exit roads onto the area will be to and from the by-pass when it is built. This will reduce rat running into town along Ellough Road which we feared from the plans recently from the housing developers. The WLP3.1 will put pressure on local services and this, I assume, will be considered.

Attached documents
Anne Frith

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 539

Comment Who will be responsible throughout the entire life of the project for safeguarding the legal rights of disabled and vulnerable people and ensuring that all people will have equal access to walk in safety and independently in all the public realms. This means traditional roadways with traditional, traffic free, pavements/footways.

My fear is that the rights and needs of disabled people, when it comes to accessing safely, and independently, all public realms on this huge development project in Worlingham and Beccles which is obviously going through despite very well founded local opposition to such an unfair scheme, will not be safeguarded.

Around the country traffic schemes and new developments are coming under increasing pressure as being poorly designed and breaching the 2010 Anti Discrimination Equality Act. Some projects have been demolished and others have had to reinstate audible crossings and other safety features at great expense. In particular areas where motor vehicles are encouraged to mingle with pedestrians, separated only by a painted line, are found to be excluding a wide range of disabled groups, - blind people, people with dementia, people with mobility scooters which of course are not nearly so manoeuvrable as a person on foot, parents with small children, and especially the elderly and the frail. These areas are frightening. Exclusion leads to isolation, becoming housebound, depression, often alcoholism and obesity owing to lack of exercise. This in turn leads to great pressure on social welfare and medical services which will not be available in this project. See the appendix to this email which is a summary of the report of the Parliamentary Commission into the disabled and the Built environment published on April 24th 2017. The Report calls for a moratorium on all such projects and that measures should be taken for it to be easier for people to challenge their local authority on such designs. There are court cases pending where bad design is held to be a contributory factor to an accident.

I am assuming that this out of all proportions plan will be accepted with
perhaps a small grudging reduction in the number of houses, and a large consequent reduction in social facilities.

1. For the whole scheme, spread out as it is over a considerable time period, with councillors and officers coming and going, the contract must contain watertight, with heavy penalty clauses, terms concerning the timing of the development. Someone must be specifically appointed to ensure at every stage, however minor, throughout the entire length of the contract, that the plans as originally laid out and agreed are strictly adhered to. Any alterations must have the agreement of the full Council and the consequences must be carefully examined, and where appropriate, restrictions must be imposed.

2. Within the contract and the plans right from the beginning, there must be very detailed plans, including road design, pavement design, and road furniture design. In fact very careful and detailed design of all public areas to ensure that they are safe and accessible to all pedestrians. To say that these are details to be addressed later is not good enough for they lead to breeches of the Equality Act of 2010, to roads with no footways, and which are too narrow to allow the promised buses. It must be made clear to the designers and contractors that the original plan must be executed even to the extent of demolishing buildings which contravene the design.

In other parts of the Country such new developments have ended up without all the social facilities planned. With no buses, and no safe access for vulnerable people, and roads too narrow for two-way traffic, let alone a safe footway or even a single bus. Presumably the governance of such schemes was lacking.

3. The time period. The infrastructure must come first. Otherwise it will be found that there is insufficient room for promised features. The original developer may sell out to another company during the contract and the original plans will not be honoured. A small number of houses, which should include some affordable housing, only should be built before social facilities are included. Already it is claimed that the NHS has said that no surgery is necessary. The Beccles surgery is in crises already and is having to admit emergencies only at certain times, has very limited flu vaccination opportunities, and the doctors are leaving due to overwork. The medical needs of another, say, three thousand people cannot possibly be absorbed. The NHS will say that over the building period new facilities will be put in. Likewise the local authority concerning schools. The schools in Beccles are already almost full, in some cases with more children wishing to attend than they have places. There is a plan for a primary school but I suggest
that, with a reduction in the number of houses and the bulk of the estate being long drawn out time-wise, Suffolk County Council can say, as it has in other areas, that there is no evidence that a school is needed. So, no development should be allowed without a guarantee from SCC that the promised school will become a reality early in the development. Having a school will greatly help the huge development to create some social cohesion.

There should also be a firm commitment from the NHS as to how medical services are to be provided before development is allowed.

4. The Equality Act of 2010 which ensures equal, safe, and independent access for all people in a public realm must be adhered to in all designs. This is particularly important as there is a current fashion, beloved by architects, large consulting companies which receive large fees for designing such projects, and developers wishing to include as many houses as possible on site, for shared spaces. The controversial elements of these are the removal of all signage, the replacement of audible controlled crossings by so called courtesy crossings which have no status in law. At these courtesy crossings, priority is to be established by eye-contact. Also the installing a flat surfaces, and the removal of any effective separation of motor-vehicles and other road-users such as blind people, people in wheelchairs, people with mobility issues, parents with small children, and people with dementia. Also just elderly and increasingly frail people who need to know that they can walk safely without sharing the surface with all types of wheeled vehicles.

5. A disability, and a compliance officer should be appointed, with powers to halt a development, to ensure that the design agrees with the Equality Act of 2010, and also considers the recommendations of the Parliamentary Enquiry into disabilities and the Built Environment published on April 24th 2017 which recommends a moratorium on all shared space schemes and that it should be easier for people to challenge the local authority if they are excluded from a public realm owing to bad design. Without a disabilities officer, and a compliance officer, I suggest that no-one in the planning department has especial responsibility in this area at present and that it just goes through on the nod in a placatory sentence such as, 'There will be provision for cyclists and pedestrians', unspecified and not described until it is far too late to comply with the Act.

If this unpopular and, in my view, ill-thought-out project goes ahead, then it must be very closely examined and very detailed records must be kept as the time scale is so drawn out it is unlikely that any of the same people will be in the planning department, and on the Council by the end of it. The
developers throughout will obviously be looking to maximise their profits in every way and the same company may well not be there at the end of the project. So individual councillors and planners must be made answerable for the different aspects of the project and, on their leaving, new people must be appointed to take over detailed records of all earlier decisions, and why they were accepted. Who at present in the planning department or on the Council has read the Parliamentary report into the disabled and the built environment with special reference to shared spaces, or the Anti-Discrimination and Equality Act of 2010?

Do not accept assurances that aspects of the project can be finalised later, especially when those aspects have any bearing on access to, and within, public realms. Do not accept biased surveys carried out by, and paid for by, the proponents of these spaces. These are carried out on site after the crossings and kerbs have been removed. All the excluded people are of course not there to be surveyed. Even amongst those who are using the space there is usually a majority against the space an saying that they would prefer an alternative route, were there one.

Appendix. Summary of the report of the Parliamentary Commission into the Disabled and the Built Environment.

Attached documents
Antonia Jones

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 633

Comment I would like to express my views on this proposed development. Obviously all us who reside here are very disappointed that it has to happen at all, but I do realise that it is under government directive.

However there are certain things that I believe should be considered re building on the field behind Alexander Close/ St Edmunds Close in Beccles.

1. The field slopes upwards as we are looking at it. This means that there will be significant drainage issues if housing, roads etc are built on that site. There is already a bit of a problem as we are lower down than the field, but as this is as the moment natural land most of the water is absorbed there before it can reach the houses.

2. Because this field is the only one in the vicinity that is on a slope, then even if only bungalows are built on there it means that we will be overlooked, whereas use of flatter fields in the area for this purpose would ensure a lot less intrusion re privacy and loss of light.

It seems as if there are plans for woodland/ landscaped strips/ buffers etc to protect/ screen parts of the new development but not to consider the residents already living here. But because of the above two issues it would seemingly make sense to make this field one of the green/ public spaces or part of the country park, perhaps with a water run off feature towards the lower ground such as a lake which the excess water could run into.

I very much hope that this will be considered as a serious prospect because as aforementioned and explained, other fields in the proposed development area are more suitable for housing, but if it does end up being nearby I would like to think that due consideration would be given to us current residents in that there would be at least a significant strip of green land and a line or more of trees bordering our properties so that some of it would be screened, and the noise and light issues could be minimised as much as possible.
Thank you in advance for your time and consideration on reading this.

Antonia Jones.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1455

Comment This is a very large allocation for the town to absorb in one location.

We are of the view that if this quantum of development is to be allocated in Beccles, it should be broken up in to smaller elements to assist both assimilation and delivery. The provision of more, smaller sites, in accordance with government guidance, would assist both choice and delivery in the town.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  1018

Comment  Policy WLP3.1 involves a significant new neighbourhood between the current southern boundary of the town and the Southern Relief Road. We support the masterplan for this proposed allocation. We agree that access to the neighbourhood for motor vehicles should be outwards onto the purpose-built relief road and that inward access to the town for pedestrians and cyclists should be created. These should be broad, high quality, "greenway" style connections. These links should include Bluebell Way, Cucumber Lane, Darby Road, Nicholson Drive, Oak Lane and Cedar Drive as listed in the Draft Local Plan but should also include Field View Gardens, the play area in Mill Road and one of the garage sites along Queen Elizabeth Drive. These "greenway" corridors should be designed at the outset so that they connect to each other and to local services rather than being accommodated in the final masterplan once all the other infrastructure is in place.

Attached documents
Beccles Society Paul Fletcher

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 678

Comment

We acknowledge the amount of work carried out by independent consultants in assessing the housing, employment and retail requirements for Waveney for 2036, and although some of these figures may in future be affected by Brexit, we have to accept the calculations as they stand.

However, the increased numbers that have been allocated for housing, for example, over and above the consultants’ figures, to take into account possible lack of progress of development in some areas, seems unreasonable in relation to Beccles.

In our case the 2 allocated sites for housing are prime locations which in theory are likely to be developed to the full extent. By increasing the numbers here we are going from 15% of total housing allocation to 16.37%.

We find this additional housing unnecessary and it will only add to the burden on the total infrastructure problems in Beccles.

Nevertheless, we thoroughly approve of and support the Garden Village principle of development and would look for strict adherence to this concept at each future stage.

We consider that Policy WLP3.1 should include reference as to how the development is to be phased in and how the infrastructure is to be funded.

In this respect it should be made clear that trigger points will be used restricting the amount of development that can be built until certain pieces of infrastructure have been provided or a contribution to them has been made.

We note that it is your intention to use Section 106 Agreements and Community Infrastructure Levies to fund the required infrastructure. We believe that Policy WLP3.1 should state this for the avoidance of doubt.

It might also be an option to make use of restrictive covenants in the sale of
land to enforce some of the policy requirements.

In order to encourage buses to serve the proposed new houses together with the existing housing estate north of WLP3.1, it is suggested that a bus gate be provided possibly in the location of one of the pedestrian/cycle routes. It is easy to control these by the use of rising bollards operated by transponders fitted onto buses, which prevents cars from passing through.

Such a scheme works well in Manchester (St Mary’s Gate/Market Street).

A 10 metre minimum landscaping strip is indicated as being necessary along the southern edge of the site WLP3.1. It is recommended that a similar 10 metre strip should be provided that equally straddles the Beccles and Worlingham parish boundary to maintain a physical and distinct separation between the two parishes.

The access to the site WLP3.1 is shown off the Southern Relief Route.

This has the effect of downgrading the status and intended purpose of the road to the level of a district distributor.

However, we understand that only with the access points at this location do we get the best distribution of traffic split either down London Road or Ingate.

On this basis we have to accept the access points as shown.

The highway and traffic situation is also of concern. The two housing sites put a significant amount of traffic down London Road causing increased problems at many junctions, including several in the centre of Beccles. This negates any benefits accruing from the Southern Relief Road.

In particular, your analysis lists several locations where highway improvements are necessary, but omits one of the most important ie London Road/St Mary’s Road/Peddars Lane, which is the most critical for London Road traffic heading towards Norwich and Great Yarmouth from both housing sites. Even Larkfleet identified that this junction needed improving.

There are several other junctions which remain critical and Suffolk Highway’s modelling work on behalf of developers will be essential in identifying the problems. Existing car parks at Tesco, New Market and Hungate Lane are already full on many occasions. What provision is to be made for additional car parking to deal with the influx of new shoppers from sites WLP3.1, WLP3.2 and WLP 7.2(Barnby 45 houses)?
Some relief to the traffic and parking situation would be provided if the small retail development comprising local shops and a convenience store (as shown on site WLP3.1) were to have the convenience store replaced with a mid-sized supermarket.

Attached documents
Follow up email 16/10/2017:

With regards to Beccles Town Council’s recent response to the Draft Local Plan, I have been asked to clarify the meaning and context of section 2.4 which reads as follows:-

Council requests that a strategic gap is preserved between the Beccles and Worlingham boundary so that each may retain their identity.

Including the word ‘boundary’ was probably the wrong word to use, and indeed this was not used in the original draft that was seen by full council. Subsequent to council receiving the draft response, I did do a tidy up of some of the wording and included the reference to ‘boundary’ during this tidy up without realising what it may imply.

The actual parish boundary is far less relevant than the ‘character areas’ of Beccles and Worlingham and the proposed Country Park was positioned to maximise the separation of the two settlement character areas. It was not the intention of the council to imply that it wished to see the Country Park moved westwards which would have the impact of moving significant allocation of housing to the east of the Country Park with direct access onto Ellough Road. The council wishes to see the Country Park remain in its proposed location and stay the proposed size.

I apologise for any confusion this has caused but hope that this clarifies Beccles Town Council’s response.

Original comments below:

The council is in favour of the proposed option detailed in policies WLP3.1 and WLP3.2 as it believes that these options are the most likely to deliver the infrastructure that the town needs and would have least impact on the road network. Council has made a number of suggested changes to the policies in order to strengthen the constraints placed on the development
and agrees with the principle that the only car access should be via the relief road and the need for retail, school, and leisure facilities on site to minimise the traffic coming into Beccles. Council supports the concept of cycle and pedestrian routes leading into the new development, and would also like to see 'Bus Gates' introduced to allow the development to be serviced by buses.

This would not only help in reducing car movements but would also assist with keeping the town bus routes economically viable.

WLP3.1 states that the ONLY car access is via two roads onto the new relief road, which council endorses. The council would like to see some BUS access, perhaps via a "Bus Gate", positioned on an existing residential road in the south of Beccles, abutting the proposed new Garden Neighbourhood area, to allow proper bus routes to service this new area. Such extensions to existing routes may lead to the routes becoming more viable and improvements to the bus time tables.

WLP3.1 suggests a master plan with shopping facilities, new school, country park and leisure facilities. These should be tied into milestones so that housing development STOPS if these facilities are needed but not delivered.

The plan states that 1,250 homes should be developed in this area and the policy states that homes should be developed at no more than 30 properties per hectare.

Whilst this is welcomed, it is noted that the area is considerably bigger than 42 hectares and thus the policy should specifically limit the total number of homes and provide guarantees as to the amount of space that will be reserved for green spaces and country parks, ponds, lakes, landscaping etc.

Council requests that a strategic gap is preserved between the Beccles and Worlingham boundary so that each may retain their identity.

The policy should provide a guideline as to which parts of an area should be developed first. It should take into consideration that building targets, especially large targets like this one, are rarely achieved and so any development that stops half way (for example) should look like a planned development and not a half finished mess.

Policy WLP1.4 is at variance with WLP 3.1. This policy states that where there is room for expansion at a local school, this should be actioned first before any new school is developed. Although Worlingham Primary School has lots of room for expansion, it would be swamped by having such a large
influx of new pupils and would lose its character as a village school. The proposed new primary school in WLP3.1 should be mandatory and developers should not be given the option to suggest extending Worlingham Primary School.

The new school site should be carefully located and designed to encourage children to arrive by means other than private car.

Pedestrian and cycle access should be provided via wide "greenway" style corridors between the current town boundary and the proposed new development. These links should connect into Darby Road, Nicholson Drive, Cucumber Lane, Oak Lane, Fieldview Gardens, Bluebell Way and Cedar Drive. This will encourage more sustainable travel from the new development to the facilities of Beccles and also provide good access to any new facilities in the development from the southern parts of Beccles.

Junction improvements should include the Peddars Lane/London Road/St Mary's Road junction.

The required upgrades to the electricity network to the east of the town to serve the new employment and housing growth are welcomed and should be stated in Policies WLP3.1 and WLP3.3.

Attached documents
Beccles Townlands Trust R Peck
Durrants (Nick Durrant)

Section: Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID: 1469

Comment: The Land

Land holdings encompassed under policy WLP3.1 with estimated areas.

See Plan in Appendix 1

Table 1

<table>
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<th>Landowner/OptionHolder</th>
<th>Land RegistryTitle No</th>
<th>Appendix 1 Plan colouring</th>
<th>Est Hectares</th>
<th>Edged red cross hatched blue</th>
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<td>Beccles Townlands Trust</td>
<td>SK90707 SK264301 SK156196 SK377458 SK301881 SK185822</td>
<td>Edged red cross hatched blue</td>
<td>21.2</td>
<td></td>
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<tr>
<td>Chenerys' Land Owners</td>
<td>SK111551</td>
<td></td>
<td>13.3</td>
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<td>Berbeck (Southern) Ltd</td>
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2.3

Larkfleet
Option Holder Not Registered.

Edged blue cross hatched yellow
53.0

TOTAL
89.8

We understand the Larkfleet Option Area includes the land under the proposed Southern Relief Road and extends overall to around 61 ha.

The total area in Table 1, 89.80ha, has been estimated by Waveney District Council (WDC). All areas to be confirmed.

The Proposal

We wish to confirm our support for the allocation of the land owned by The Chenery’s Farmland Group which is edged red shaded green and edged red shaded brown (which is referred to in Table 1 above) as included under policy WLP3.1. Furthermore, since the Call for Sites & Issues and Options consultations were undertaken agreement has been reached between The Chenery’s Farmland Owners Group to work together in order to achieve the development of the land to the west of Cucumber Lane. We therefore confirm firstly the availability of all the land west of Cucumber Lane for development and secondly our commitment to ensure its delivery during the Local Plan period to provide much needed housing stock for the local area.

The Chenery’s Farm Landowners’ Group accepts that Policy Land WLP3.1 will be developed following the principles of the WDC Masterplan (see Appendix 2). The development of a comprehensive Masterplan is in accordance with the Governments draft White Paper (Fixing Our Broken Housing Market) which identifies the need to build houses faster.

The First Draft Local Plan states that more people are moving into the Waveney District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth the demand for housing is growing. The development of the land
included within policy WLP3.1 will greatly assist the Council in addressing these issues and meeting the housing need during the Local Plan period. Additional benefits to be achieved from the development of these sites include the provision of much needed affordable housing, sizeable CIL contributions to be used towards the improvement of existing and provision of new infrastructure and facilities, the provision of open space and recreational facilities for the benefit of future and existing residents and the wider community.

It is considered that collaboration between the Chenery’s Farm Landowners Group, will assist in the delivery of the Masterplan thereby addressing:-

* Services
* Social infrastructure (including the junior school, playing field and country park)
* Roads
* Cycle paths
* Landscaping

Development Progress

The Chenery’s Farm Landowners’ Group made independent submissions to WDC under the Call for Sites consultation which closed on 9th January 2016. It now, in collaboration, wish to see Policy WLP3.1 proceed in an orderly and structured way.

In order to provide the joint approach The Chenery’s Farm Landowners’ Group anticipates formulating a legally binding Collaboration Agreement which will effectively combine the two sites (from a delivery perspective).

The Chenery’s Farmland Owners Group is prepared to work with other parties included in the Local Plan allocation in order to facilitate the delivery of the Master Plan.

**Attached documents**


Broads Authority Natalie Beal

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 494

Comment The Beccles and Worlingham Garden Suburb, together with Land west of London Road, Beccles total 1500 dwellings. The significant population increase would suggest added recreational pressures on nearby Broads sites particularly in the Waveney valley for which landscape mitigation would be needed.

Attached documents
Charles Fortt

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 422

Comment I support policies WLP3.1, WLP3.2 and WLP3.3.

Attached documents
Chenery's Land Legal Land Owners
Griffiths Eccles LLP (Julian Griffiths)

Section  
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  
1470

Comment  
The Land

Land holdings encompassed under policy WLP3.1 with estimated areas.

See Plan in Appendix 1

Table 1

Landowner/OptionHolder

Land RegistryTitle No

Appendix 1 Plan colouring

Est Hectares

Beccles Townlands Trust

SK90707 SK264301 SK156196 SK377458 SK301881 SK185822

Edged red cross hatched blue

21.2

Chenerys' Land Owners

SK111551

Edged red cross hatched green

13.3

Berbeck (Southern) Ltd

SK76813 SK262272
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The Chenery's Farm Landowners' Group accepts that Policy Land WLP3.1 will be developed following the principles of the WDC Masterplan (see Appendix 2). The development of a comprehensive Masterplan is in accordance with the Government's draft White Paper (Fixing Our Broken Housing Market) which identifies the need to build houses faster.

The First Draft Local Plan states that more people are moving into the Waveney District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth the demand for housing is growing. The development of the land
included within policy WLP3.1 will greatly assist the Council in addressing these issues and meeting the housing need during the Local Plan period. Additional benefits to be achieved from the development of these sites include the provision of much needed affordable housing, sizeable CIL contributions to be used towards the improvement of existing and provision of new infrastructure and facilities, the provision of open space and recreational facilities for the benefit of future and existing residents and the wider community.

It is considered that collaboration between the Chenery's Farm Landowners Group, will assist in the delivery of the Masterplan thereby addressing:-

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* Social infrastructure (including the junior school, playing field and country park)

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* Cycle paths

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The Chenery's Farmland Owners Group is prepared to work with other parties included in the Local Plan allocation in order to facilitate the delivery of the Master Plan.

**Attached documents**


Chris Clark

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1747

Comment The town is struggling already with number of people living here we do not have the capacity or the infrastructure to cope with a development of this size. The roads are full and traffic jams are a regular occurrence, the doctors are at breaking point and how does building one infant school and a sports centre which we already have help anything. And let's face it the jobs on offer will be low paid and small in number so playing the job card fools no one. Who in their right mind would think this is a great idea unless of course you are the developer. So go ahead build it I guarantee councillors will lose their seats and be responsible for finally destroying our market town.

Attached documents
Chris Greenhill

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 758

Comment A key question about this site is whether it can really be seen as a self contained community with some resources such as a primary school, shops and recreation facilities, or whether it is really just an extension to the existing built up area, albeit hopefully with a higher standard of layout and design.

Beccles is not badly served with sports facilities, although nearly all are in the north side of the town. I wonder if it would be better to use any Section 106 or Community Levy money to boost existing resources rather than duplicate them.

As a retired person, I rather wonder whether a retirement community in this location is really sensible. The most recent increase in housing for the retired community I have observed is McCarthy and Stone and the like in Norwich, where the sites which are chosen are near to the city centre. Retired people bear in mind the time when they may not be able to retire and depend on being able to get the bus or walk to the shops. An increasing proportion of elderly people are being cared for for longer in their own homes. The resources for new schemes such as extra care housing and care homes are currently in very short supply, and it would be to my mind risky to hold land available for such uses. A similar comment applies to the country park. Beccles is blessed by its location on the edge of the Broads, and I cannot see that the landscape in this area is likely to be a competitor.
6. This becomes very clear when considering the Plan allocation of 1,250 new houses in the Beccles and Worlingham Garden Village plus an additional 250 west of London Road. The Introduction to the Plan states that work on infrastructure provision, among other things, has still to be done, but designating major sites such as these in Beccles in advance of such essential information puts the cart before the horse and will encourage premature planning applications. These two designations represent an approximately 23% increase in the town’s dwellings, indicating the potential scale of the problem. The Garden Village alone represents a 78% increase in the size of Worlingham. (Both using 2014 figures for existing stock.) The specific problems are:

7. Traffic. The Beccles Southern Relief Road was justified partly on the grounds that it would relieve the town of commercial traffic. As far as I am aware, releasing the land between it and the town for strategic scale residential development was not discussed or at least acknowledged, during its consultation stages. The new road can do nothing to divert the substantial volume of new domestic traffic from the town and it will be necessary to make a very stringent assessment of whether this doesn’t offset the benefits provided by the new relief road. Encouraging cycling to reduce vehicular traffic can only have a very limited impact, as there is no cycle-path network into the town centre.

The Plan states that traffic from the Neighbourhood Village will be encouraged to travel into Beccles along the London Road, and all the traffic from the new housing to the west of the road will naturally do so. This is not without its problems: although the Ashmans Road/Fredericks Road has been identified for improvement in the Plan, the issue of visibility onto the London Road from Ashmans and South Road isn’t easily resolved. After the London Road becomes Hungate there is a pinch point at the junction with Blyburgate where cars already queue.

A Regional Cycle Route crosses the London Road and is used by pupils
cycling to school from Worlingham and south Beccles, amongst others. Presumably cycle traffic will increase significantly with construction of the developments, so there will be an increased conflict between that and higher vehicular flows on the London Road.

8. Schools. The District’s Draft Infrastructure Study reports that the Sir John Leman School is already over-capacity and there is the prospect of pupils having to travel into Bungay. This will obviously cause inconvenience, generate more traffic and conflict with the Plan's aim to encourage walking and cycling.

9. Medical services. The Infrastructure Study simply reports of the Beccles Medical Centre that it is still taking new patients, ignoring the now chronic inability to recruit and retain doctors there. This is a very real problem, and not one resolvable by the planning system.

10. Foul water disposal and the River Waveney. AECOM, the District’s Water Cycle Study consultants identify the Beccles/Marsh Lane sewage treatment works as the only one in the District that will exceed capacity if proposed developments proceed. They identify measures judged to lift this constraint but appear to set the bar very low in assessing the impact of new development. The River Waveney now has only 'Moderate' waterbody status, indicating its vulnerability, and there are no proposals to enhance this, despite the fact that the Plan identifies decreasing water quality as a key issue. This is an example of the Plan’s insufficiently robust approach to environmental enhancement.

AECOM advises that ‘development phasing accommodates likely infrastructure upgrade requirements’. Plan policies WLP3.1 and 3.2 designating the residential land in Beccles should be amended to state explicitly that development cannot proceed until the Anglian water facility has been fully upgraded, and not just post 2030. The opportunity to improve the River Waveney’s waterbody status should be explored, taking into account new technologies that may become available.

11. Adopting the design principles of the Garden City movement is to be welcomed but the movement’s first three principles relate to community land ownership and involvement. Is it proposed that the community will own the primary school, country park, sports facilities, allotments and community centre proposed as part of the Beccles/Worlingham Garden Neighbourhood? It is misleading to use pictures of Hampstead Garden Suburb to illustrate this section as its principles included low density housing with hedges in-between, quietness, plus no employment and few
12. The site specific criteria in policy WLP3.1 should include a requirement to include a sustainable drainage scheme and to design and plant all green elements of the scheme so as to increase biodiversity.

13. Finally, I question how the development can respect the separate identities of Beccles and Worlingham when the designation, including the main access road, runs continuously across land to the south of both areas and straddles the parish boundary.

In summary, the scale of housing provision should be reconsidered and reduced District-wide, and the number of new houses on the Beccles sites should be further reduced, if necessary, so that there is no adverse impact on the town’s existing infrastructure or residents. No development should be permitted on the Garden Neighbourhood and London Road sites until the infrastructure constraints identified above are fully resolved.

Attached documents
Dave Catchpole

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 376

Comment I fear a development of this scale would be severely detrimental to the town overall, as it stands we have a doctors surgery suffering a chronic shortage of GP’s who have imposed a restrictive service to avoid further overloading there own staff. This would only get worse in the coming years if they are not able to increase their staff levels within their existing budget.

Sole access into and out of the development is via the soon to be build Southern Relief Road, yet Cucumber Lane (and houses at the top end of the St's Roads, Banham Road and QED are being cut off from it, purely for the reason of not wanting it to be a rat run, yet to an extent it could be viewed as such for traffic entering the relief road from this site, maybe a view to allow one way traffic from Cucumber Lane onto the access road could be considered during development should it go ahead.

Schools in the area are already suffering from tight budgets and as a Primary School is earmarked for the site this could cause a potential of teacher shortages, or schools suffering due to a shortage of quality teachers, let’s hope any potential primary school doesn't suffer from not being fully allocated as per recent years at Beccles Prison, I mean Failure, no I really mean Free School.

Why not a more balanced allocation of housing with a quarter on part of this site, with the other allocations applied to other sites around town, the concentration of such a large number of additional housing seems unbalanced and would be better distributed to avoid further congestion into Town along Ellough Road, Ingate, Peddars Lane and Blyburgate. Whilst the SRR may take HGV type traffic out of the centre that is a small proportion to what will still be heading through town to get to the Bungay Road or the Town Centre.
David Harrington

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 659

Comment I feel strongly that there should be a "landscaped buffer" between the new development and existing housing. This buffer should exist to soften the impact of the new housing on existing residents.

Attached documents
David Harrington

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 588

Comment I support the long term plan to increase housing, local facilities and employment opportunities in the Beccles area and I believe that the way ahead is to engage with the developers to ensure that any development is appropriate, sustainable, needed and most importantly, reflects the architectural styles and layout of this beautiful corner of Suffolk.

However, I feel that whilst the New Development is to be afforded green boundaries to soften the view of M&H to the West, The Southern Relief Road to the South and Ellough Industrial area to the East, there is no provision to provide a green boundary between existing housing and the proposed development. This is particularly important in the North Western area of the development (the field backing onto Alexander Close/Mill Road) where the field has a pronounced slope. Any houses built in this field will overlook the houses in Alexander Close/Mill Road which will reduce privacy and eradicate the field views that they currently enjoy. Some consideration has to be made for this.

In addition, the slope in the field already poses a flooding risk due to the underlying clay geology, a problem that will only be exacerbated by the water run off from the houses and roads that are proposed. Improving the current drainage is unlikely to be a solution as an already substantial drainage ditch sometimes struggles to cope with the run off from the farmers field.
David Harrington

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 660

Comment I would like to know what will happen to the existing "Clay Pit" near to the park at the end of Mill Road. It can't be filled in as that would involve uprooting existing trees/hedgerow, but it would be a danger to nearby houses and families.
David Harrington

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 658

Comment I would like to see a mixture of architecture.

Primarily I would prefer the new development to take the majority of its "architectural style" from the older buildings within the local area (namely "Flemish Gables", Black boarded barn style, thatched roofs etc). I do not want to see "carbon copy concrete blocks" of row upon row of buildings.

Secondly, I also believe that there is room for the occasional building of exceptional, high quality modern architecture, which would add interest and inspiration to the local area.

Attached documents
Donna Lowman

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 318

Comment I have found it very upsetting that after initial meeting last year in Worlingham over proposed 900 new homes that the council did not take on board that local people do not want this many homes being built, not only have you not taken on board that 900 was far to many homes/residents for a small market town to support, you deemed it okay to increase the number to 1473. Absolutely disgraceful....

The people of Beccles and Worlingham are not in anyway going to benefit from this, it is only going to cause grief and upset and put a Town that is already struggling and seems to be underfunded under more pressure...

Attached documents
Donna Lowman

Section
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID
320

Comment
You are planning on building 1250 mixed use properties on land off Ellough road. This includes a school, play areas, allotments, local shops, community area, employment development, country park, sports field and a community centre, oh and also homes.. Wow ... that is a lot to build on one smallish piece of land.. But also all of these are right next to an industrial estate where dirt and dust are in abundance. Also you are planning on building on land that backs on to two other estates causing these houses to become overlooked ( loss of privacy that they had paid for) Is it even legal to build this close to an industrial site? Is it ethical?

When I asked your planning officer to point out where the school was to be built, where the park is going to be, where are the shops I was told the planning had not gotten that far and no decision had been made as to where buildings are to go...

Disgraceful......

You have not thought this through at all.

You have not thought about the residents at all, residents that voted our councillors in.

What about flooding, what about smells from surrounding area ( believe me when I say it pong some days) What about the sewage? Can the sewage system cope? We have been flooded by sewage in the past. It is heartbreaking......

What about the roads, more cars, more danger....

Our infrastructure can not cope with this many more homes/residents..

The people of Beccles / Worlingham do not want this many new homes..

Who will benefit from this ?????
Certainly not the residents that live here now and I don’t see how it will improve any new residents lives either..

Also how is it you have not looked at local builders to build any new homes and after looking at LARKFLEET online this is definitely a company I would not employ ... some terrible reviews and no after care service ....

As I say... the people of Beccles / Worlingham voted ... yes voted .... our councillors in..and the people can easily show their unhappiness by voting these councillors out.....

Attached documents
E A Shakespeare

Section       Policy WLP3.1 - Beccles and Worlington Garden Neighbourhood

Comment ID   219

Comment       Totally against this amount of houses in one place.

You have a fight on your hands!
Elaine Snell

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 255

Comment There seems no mention of Care Homes or specific area’s of interest for older residents, people that have spent many years in the area and wish to stay close should not be excluded.

It does show play area’s, a primary school, park, allotments, sports and employment but that seems geared around families and the young. The older population is growing and should be allowed for in this 20 year plan.

In short I need more information to make an informed choice.

1. When will the building of homes etc start?

2. Which area’s will be first?

3. Is there room for change dependant on local circumstances?

4. How will the Doctor’s practice manage?

5. What plans are there for Beccles Hospital?

6. What provision is there for the older growing population?

Attached documents
Environment Agency

Section
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 870

Comment
We support this policy in regards to its desire to preserve existing field boundaries, hedgerows and woodlands. These features should form part of a wider green infrastructure to benefit both people and wildlife.

We believe further detail is required in regard to sustainable drainage. Sustainable Drainage Systems (SuDS) can assist in managing as much of the surface water runoff as possible on site and increasing the environmental benefits of the development through the effective use of water resources. SuDS should be designed into the scheme at the earliest stage and included as part of the green infrastructure planning. These SUDS can provide:

* Flood attenuation – helping to preventing surface water flooding, and flash flooding in the

* Groundwater recharge – Storing surface water run-off and allowing it to be released slowly will help water to percolate back in to underground

* Filtering Pollutants, allowing sediments to

* Ecological benefits through creation of ponds, swales wetland areas and tree planting as part of SUDs This will create new habitats, and where land was previously industrial or agricultural, bring a quantifiable increase in ecological diversity. These features can also enhance the appearance and appeal of the built environment and have amenity value.

* A reduction in pressure on local sewerage infrastructure which may already be at

* Provide a source of water for urban activities such as gardening and bring benefits for recreation, education and

* Further information can be found at susdrain.org/delivering-suds/using-suds/suds-principals/
principals]

Using surface water as a resource will be increasingly important as pressures on water resources increase in the future. Change in rainfall through climate change, rising population and urbanisation are all driving factors. Capturing and using rainfall within the urban environment can provide environmental benefits as well as increasing amenity value.

Attached documents
Fay Baldry

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 158

Comment Why at such an important time did Waveney not invite Larkfleet / developers along to demonstrate their plans / forecasts?

If the developers already have the option of the larger part of the land with that landowner can they enforce sale of adjoining land from the other two smaller landowners? Particularly if they need access routes across this other land.

If WDC give planning for the 450 (approx) houses can Larkfleet appeal for additional housing – if so, how likely are WDC to give approval in the future so that they meet government requirements.

Will WDC enforce the building of the school and medical centre?

Has WDC/SCC set aside or made allowances for the funding of the new school?

Attached documents
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| **Comment** | The proposed development on the Worlingham site has not been very well thought out. 

The doctors cannot cope now with the amount of patience they have! So how will they cope with 1000-2000 new homes. The NHS will not pay for a new practice. Schools – who will pay for a new school? 

These new homes will not be a positive step for Beccles/Worlingham. Why does this development have to be so big!? Who is going to fund a sports centre? What will happen if no one comes forward to build these extra facilities, will the land be used for more housing? |

**Attached documents**
George Fisher

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 8

Comment My property adjoins the proposed site, and, surprisingly, I would like to make it clear that my wife and I are fully in favour of the proposals. Our house spoilt the view for those living on Coney Hill - so after 36 years it is time for us to lose ours!

George and Janet Fisher

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 957

Comment The Plan includes a number of proposals for large scale strategic allocations that account for much of the Plan’s housing requirements including Policy WLP 2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood; Policy WLP 2.12 – North Lowestoft Garden Village; Policy WLP2.15 – Land South of The Street, Carlton Colville/Gisleham; and, Policy WLP 3.1 – Beccles and Worlingham Garden Neighbourhood. Whilst the identification of strategic allocations is an approach that can be 'made sustainable' through the timely provision of associated infrastructure, it is essential that local plans take into account the risks associated with the delivery of any such schemes and the knock on effect that this can have in terms of housing delivery. It is also noted that the Plan is not currently accompanied by a viability study and it is vital that this evidence is produced alongside robust assumptions regarding infrastructure delivery and its impact on the likely rates of delivery from strategic sites.

As indicated in response to Policy WLP1.1, it is essential that the Council’s suite of housing land allocations can demonstrably deliver the local plan requirement over the plan period whilst maintaining a five year housing land supply.

Attached documents
Graham Jackson

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  591

Comment  I fully support and commend the Local Plan as it applies to Beccles and Worlingham.

The First Draft Plan correctly, in my view, recognizes the opportunities resulting from the opening of the Southern Relief Road and the proposals for WLP3.1, WLP3.2, and WLP3.3 are logical outcomes based on the concept of a Garden Neighbourhood.

I applaud the proposed extension to the Beccles Medical Centre especially if vehicle parking can be extended.

Attached documents
Graham Jenkins

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| Comment | With reference to the proposals for the proposed development of the site boarding on the Beccles Southern Relief Road.

I object to the development on such a large scale for the following reasons.

1. There is no provision for a Pharmacy or Post Office.

2. The density of the number of houses proposed on the site appears to be excessive.

3. The additional cars will create parking problems in Beccles which is currently at saturation point.

4. I am not convinced that the air quality can be maintained at current levels. Also the houses will probably be affected by the obnoxious odours currently experienced in Worlingham from the Mathews Poultry Farm near the site.

5. Similarly I am not convinced the current traffic jams at Inngate will improve.

6. The Beccles Health Centre will not be able to cope will all of the extra patients. It is not possible to extend the facilities on the current site, as suggested. A new centre should be given priority within the NHS funding arrangements.

7. If houses are to be built on the proposed site the number should be reduced by at least 50% and greater emphasis place on the Country Park aspects.

8. Is it possible to gain access to the comments by Larkfleet Homes on the revised plans?
Attached documents
H Leman

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 506

Comment Although I am not happy about the large number of homes being proposed for Beccles and Worlingham because of the added strain on the roads network and the already overstretched Doctors Surgery, water and sewage capacity I think the site at Worlingham with its close proximity to the Southern Relief Road is the best of the bad options.

At least with this site there is an opportunity to create a green and pleasant environment for the residents to enjoy, which could also benefit wildlife if done sympathetically.

Attached documents
Historic England

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1384

Comment There does not appear to have been consideration of the setting of grade II listed Worlingham Manor, though we note that the indicative masterplan on page 89 indicates that a country park will be bordering Ellough Road.

Attached documents
John Cakebread

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 92

Comment The draft masterplan is very different and better to the one distributed by Larkfleet. It does look more attractive and well-spaced out.

My first previous concern was the potential loss of privacy, should a 2 storey building be built at the rear of my property, Bluebell Way. Should this draft be accepted, this will not be a problem as a country park is planned to back onto my garden.

My second concern was of water drainage. The amount of housing on higher ground poses a significant risk. My garden becomes very wet following heavy rainfall. With a large development this can only become worse and increases the danger of flooding.

Lastly, 1250 new homes require considerable infrastructure. Beccles Medical Centre struggles to cope with demand now. I am not sure that an extension will suffice.

I realise you will no doubt be swamped with correspondence. However, should there be time to reply, I would appreciate it.

Attached documents
John Trew

Section  
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  526

Comment  1. Existing housing mitigation:

When one buys a house that backs onto open fields, it would be very naive to believe it will stay as open fields for ever, thus I accept that the land is to be built on. However, I am very concerned how near the new homes will be to my property. The land beyond my garden rises some 30ft and whilst I appreciate that there are normal concessions made as to how near houses are built in this scenario if, in their design, they happen to have high apexed roofs, they will still appear to tower over my property despite being the required distance. We currently enjoy big open skies from our garden it would be a huge disappointment to have this spoilt.

Assuming the development goes ahead, we will have noise and disruption over our back fence for some considerable time which would certainly affect not only the value of our property and would most likely prevent an immediate sale should we wish to put it on the market (being well into our 70s, we will be of the age when we’d be looking for somewhere smaller). Would not be too much to ask that some dispensation be planned along the northern boundary which would help to lessen the impact.

2. Wildlife:

Reading through the Local Plan, there appears to be no mention of concessions for wildlife. Yes, there are large park areas planned but with this number of housing and associated people, wildlife will have been poorly served. Part of Worlingham’s Neighbourhood Plan proposals was to plant a substantial hedgerow along this northern boundary of any development which could have two main effects:

* To dissipate the noise and disruption from the building work
* Enable the creation of an important area and corridor for wildlife.

You may be interested to know that since living in Foxglove Close and
monitoring the bird life over the last 10 years, we have amassed a total of 70 species either in our garden, in the field or just flying over. In addition we have observed both deer (two species) and foxes. Surely any new development these days should include wildlife provision and a hedgerow corridor would be ideal. Perhaps consultation with the Suffolk Wildlife Trust would be an idea.

Current thinking for the provision of wildlife is to have "joined-up" habitat rather than isolated patches. Thus the creation of a corridor would go a considerable way to providing this giving wildlife access out to the open countryside at either end. Provision and access for wildlife is acknowledged today to be also good for people and studies are continuing to measure the importance of garden birds and wildlife to our mental health and well-being.

Certainly the allotment areas planned will provide some habitat but these need to be joined up in some way rather than left as isolated pockets.

In many developments these days, part of the building work includes "swift bricks" which give vital nesting opportunities to these declining birds without impacting on the house owners. Surely this is something to be encouraged as is the case in nearby Harlesdon.

A final point: when planting up the new development, Waveney should keep to native trees and shrubs which are better for wildlife than more exotic species. Again advice from the Wildlife Trust would be beneficial.

3. Car Parking:

It was interesting when conducting a survey for Worlingham's Neighbourhood Plan, I found that in the Bluebell Way area of the village, over 90% of residents chose not to put their cars in their garages - no doubt they are being used for storage. The result of this is, at evenings and weekends, cars are parked wherever there is space – on the pavements, grass verges (which are thus being ruined) or anywhere there is a vacant spot. In my own cul-de-sac, we regularly have seven cars parked, none of the owners living in the Close (or even, in one case, in the village). This causes problems for deliveries which regularly call.

I don't how one overcomes this problem but it is one issue that certainly requires addressing.

Whilst on the subject of parking, I hope when the plan for the school is designed, the issue of parking for the dropping-off and collecting of pupils is
taking into account. One thing is certain, I would never buy a house near a school because of the selfish parking by parents. Residents who even live some distance from Worlingham school have constant issues with parking as to those in Allendale Drive.

Attached documents
John White

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 39

Comment

I have looked at your plan and two things have not been discussed, firstly the pressure on the beccles doctors surgery, they are at the moment very short on GPs so much so that seeing a GP is getting difficult. If you add 1200 homes estimating at least 3 people per home that adds 3600 people to the surgerys list, this adds an unacceptable burden on the GP and medical services, has a meeting taken place to speak to the Health Trust on the influx of numbers and if they can cope, this will also affect the Ambulance Service and Fire Brigade. At the moment we have no working Police Station in beccles and police Services have to come from Halesworth will this lack of cover be suitable for the comunity of beccles when this influx of people happens.

Traffic is the other problem. The hill going down to the traffic lights in beccles gets snarled up every day and the air quality at that junction must break every emissions law going, has a study been completed on the effects of the polution of all the extra trafic going through beccles, this could well be at least 2000 cars a day, this includes the market square area by Twyfords Cafe, there needs to be more parking available in beccles espically for the older people who can not walk to far. on the whole I agree with the plan but ther seems to be some important items that there is no plan for or even been discust. Once this building starts there will be no turning back so please dont leave the beccles community with a nightmare on their doorstep for years to come. could I please have an answer on my questions i have asked. Thank You

John White

Attached documents
Josi Horne

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 181

Comment Will there be any community focus point on the WLP3.1 site e.g. for young people – or can this be allocated elsewhere in the town?

Attached documents
Larkfleet Homes -
Seth Williams

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1482

Comment 1.0 INTRODUCTION

These representations are made in response to the Draft Local Plan consultation on behalf of our client, Larkfleet Homes Norfolk and Suffolk. The Company is part of the Larkfleet Group, a privately owned housebuilder and developer headquartered in Lincolnshire. Larkfleet have an interest in land west of Ellough Road to the south of Beccles and Worlingham and have undertaken a range of engagement exercises – including with the local community, Worlingham Parish Council, Beccles Town Council, Waveney District Council, Suffolk County Council and other key stakeholders - to gauge opinion of the potential development of the site. The land was identified earlier this year as part of the Call for Sites process (referred to as Site Number 82), but for clarity a site plan has been included as Appendix 1.

These representations address, in the first instance, our general consideration of the Plan so far as we consider it essential that it plans positively to provide sufficiently for the objectively assessed needs of the It is essential in the first instance that it provides for the projected future growth and supports the vision and objectives of the Plan. In this regard, these representations are supported by a Review of the Objectively Assessed Housing Need of Waveney District in the Emerging Plan prepared by DLP’s Strategic Planning and Research Unit (SPRU).

Sections 2.0 therefore set out our general commentary on policy issues whilst Section 3.0 refers specifically to the land south of Beccles and Worlingham and Draft Policy WLP3.1.

This statement should also be read in conjunction with previous submissions we have made to the local plan process, namely the Call for Sites exercise in January 2016 and the Options Consultation in June 2016.

We welcome the inclusion of the site as part of a proposed allocation in the
Draft Local Plan but have some concerns with the detail of the allocation which are described Larkfleet’s site forms the majority (approximately 60%) by area of the proposed allocation and therefore is readily deliverable both on its own and as part of the wider allocation.

Beccles is a highly sustainable location and development of the proposed ‘Garden Neighbourhood’ would offer a prime opportunity to promote and ensure the continued vitality of the town and provide the new homes and services that are needed in an appropriate and accessible location.

As identified previously, the land is not subject to any local, national or statutory constraints that would inhibit development.

The scale of the allocation proposed offers scope to deliver a residential led mixed use development including a variety of new facilities and services that would complement of both Beccles and Worlingham and support the long-term viability of Beccles as an important market town.

The site offers potential for development that would offer significant reciprocal benefits to the town of Beccles and the adjacent settlement of the provision of a mix of housing types and tenures would supplement and enhance the town’s existing housing stock which has seen relatively little growth or refreshment in recent times. The development of the site would also offer significant economic benefits, provide a boost to existing services and facilities and help to enhance and revitalise its status as a key service centre. In particular, the site is well-situated to provide housing associated with the ongoing and future development of the Ellough Industrial Estate and Enterprise Zone, an important employment area. It also offers potential to enhance and supplement the existing community facilities in the locality and to improve accessibility to services and facilities in the vicinity, in particular the southern edge of the town, and to Worlingham.

While the site sits outside the boundary of Beccles (as defined in the current adopted Local Plan), the approved route of the forthcoming Southern Relief Road adjacent will create a hard, physical edge that would enclose the site and provide a logical end to the settlement boundary of this new boundary means land between the existing boundary and road presents itself as an optimal location to provide new growth.

Larkfleet have, to date, carried out a significant amount of technical assessment in relation to the site, including matters such as transport and highways, flood risk and drainage, heritage and archaeology assessments, ecology (species and habitats) surveys, landscape and visual appraisal, air...
quality, noise, odour, contamination, utilities, water cycle and resources.

In addition to this, they have undertaken a substantial amount of stakeholder and community engagement, including holding two public exhibitions, engaging with local stakeholders (including Beccles Town Council and Worlingham Parish Council) and statutory providers (such as the Education Authority, Highways Authority, healthcare providers, built and outdoor leisure facilities providers, etc.).

This raft of preliminary work and engagement has ensured a detailed understanding of both site-specific and broader local issues which has informed Larkfleet’s understanding of, and proposals for, the There Therefore, these representations are considered to be well-informed and founded on an appropriate and detailed evidence base.

We would also highlight the proactive and positive way in which Larkfleet have engaged with Waveney District Council in order to work collaboratively to bring forward appropriate proposals for the This engagement has served to demonstrate the deliverability of the proposals and we welcome the opportunity for continued collaborative working to secure an appropriate and deliverable allocation in support of the Local Plan vision and objectives for the District. We consider such collaborative work is essential, the reason being that it can facilitate the early delivery of the site which is necessary to ensure that the District can demonstrate a continuing five year supply of housing land, to meet the Government’s requirement to boost significantly the supply of housing land and to ensure that the Local Plan can be demonstrated to be robust and capable of implementation.

Masterplan

We note that an indicative masterplan of the envisaged Beccles and Worlingham garden neighbourhood is provided as Figure 14 of the Draft Local We are concerned to note that this masterplan appears to have little regard to technical evidence and the specific constraints and opportunities that the land identified by Policy WLP3.1 exhibits. In progressing Larkfleet’s proposals for their part of the wider allocation to date, a number of criteria have been identified which will necessarily have a defining influence on the proper masterplanning of the site, which has evolved accordingly to reflect these. This has included engagement with key stakeholders and the local communities as well as technical and infrastructure matters.

* In particular we would raise the following issues that have been
considered and form key opportunities/constraints:

* The most appropriate location for employment uses in terms of impacts on amenities and benefits of co-location with existing employment uses and the proposed local centre;

* The presence of a water main traversing the site from east to west and need to maintain an appropriate easement for access/maintenance;

* Discussions with Suffolk County Council (as Education Authority) regarding the preferred location of a primary school within the development;

* Discussions with leisure facilities providers in respect of the identified need for built indoor and outdoor facilities in the locality, their form, preferred location;

* The provision of a Continuing Care Retirement Community, its preferred location and the benefits of its co-location with other community uses and the proposed local centre;

* Maximising opportunities for sustainable modes of transport; e.g. bus routing, footpaths and cycleways;

* The opportunities provided by existing rights of way on and adjacent the site in terms of promoting accessibility;

* Ecological opportunities provided within/adjacent the site and requirements to incorporate mitigation measures (for example, to alleviate recreational pressures on nearby Broads SPA, etc);

* Impacts of noise on the development from external sources (e.g. the forthcoming Beccles Southern Relief Road and adjacent commercial land uses);

* The consideration of impacts on existing residents at the south side of the town and provide enhancements/mitigation in terms of amenity, access to facilities, etc;

* The requirement for any retail offer to be highly visible and accessible from outside the development to ensure it presents a viable opportunity for a commercial operator;

* The indicative masterplan (and the allocation plan itself at Figure 13) currently excludes an area of land in the southeast corner which is to be used as a construction compound for the construction of the Beccles SRR
but will thereafter revert to its former. Rather than exclude this area from the proposed development - which would be likely to result in it becoming an unused area of waste ground - we would suggest its inclusion and positive identification for use as part of the allocation.

Overall however, Larkfleet support the principle of creating a masterplan for the overall site and look forward to seeking agreement with WDC regarding its provisions having regard to these factors, and in respect of delivery of the development – see comments below.

Country Park

We note that little justification or technical rationale appears to have been provided for either the scale or location of the ‘country park’ element proposed within Policy 3.1’s proposed allocation. Whilst we understand and accept the rationale for a country park in principle, we consider there to be strong justification for it to be more beneficially located in terms of both ecological and accessibility reasons and in accordance with the Council’s own evidence base.

These representations are supported by a Briefing Note prepared by Lockhart Garrett (provided at Appendix 2) which considers the proposed country park element of the It concludes that a country park could have multiple benefits through increasing existing levels of accessible open space of benefit to people and wildlife. It notes that the currently proposed location appears to be principally motivated by the desire to provide visual screening benefits as well as direct access for existing and future residents located in south Beccles.

Based upon a review of available baseline information, an alternative location further to the south-west is considered likely to result in a more optimal balance of planning and environmental benefits. Such a location is proposed so as to maximise the green infrastructure benefits of a country park in terms of complementing existing wildlife and green corridors, maximising the retention of habitats of local value and also to ensure that areas of country park provide a visually interesting and accessible space for existing and new residents in south Beccles. This rationale is clearly explained, justified and supported by the Council’s own evidence base.

Viability, Phasing and Deliverability

As noted above, the indicative masterplan provided at Figure 14 appears to have no regard to specific technical constraints and opportunities presented by the On this basis, it would appear to fail to provide a
framework for development that would prove viable and deliverable. As a housebuilder, Larkfleet’s intention would be to deliver housing on the site at the earliest opportunity, which is also necessary to achieve the objectives of the Local Plan and of national planning policy. Preparation of Larkfleet’s proposals for the site has been made accordingly.

In order to ensure the site allows for early delivery of housing which is not unduly burdened by infrastructure requirements, it would be necessary to obtain access to an initial phase utilising the existing highway network such as not to be constrained by the delivery and completion of the Beccles SRR. This has been scoped with Suffolk County Council as Highways Authority and confirmation has been obtained that the existing road network has capacity to support additional development served directly off Ellough Road. An access off Ellough Road would therefore necessitate early phase delivery being located in the eastern part of the site.

Furthermore, investigation in respect of the existing utilities infrastructure serving the area has identified the need to obtain an initial connection in the northeast corner of Larkfleet’s. This would also therefore direct early phase delivery to the eastern part of the site where a country park is currently identified.

We note the indicative masterplan currently illustrates two access points to be provided off the Beccles Whilst we would support the principle of providing access to the proposed development off the SRR, it is not feasible for this to form the only means of vehicular access to the site for a number of reasons. Firstly, as previously mentioned, this could constrain the early delivery of the development due to reliance on the timeline for completion of the SRR. In addition, it would not adequately serve the entirety of the site - notably the employment land currently indicated in the southeast corner which would, as proposed, appear to be disconnected from the main estate road or, in any event, necessitate the movement of commercial vehicles through the residential areas of the development.

The provision of vehicular access only to the south would also give rise to a disconnected form of development which would integrate poorly with the existing The facilities and services the development would deliver should provide benefits to the wider community and should therefore be readily accessible from the existing urban area as well as from within the development. Similarly, access to the town and its services and facilities would be important to the proposed development.

Furthermore, the provision of only two points of access which rely on
access through/over areas in multiple land ownerships would unnecessarily complicate and could potentially delay or put off the delivery of the development.

We would therefore advocate an approach that allows for a more flexible approach to vehicular access that ensures development is not unduly constrained or stalled by a rigid framework for access. Highways modelling work that has been undertaken to date in respect of Larkfleet's proposals, in consultation with Suffolk County Council, has identified capacity within the existing highway network, along Ellough Road, to accommodate additional vehicle movements and it is therefore considered appropriate for this existing thoroughfare to form part of the highways solution to serve the proposed development and integrate it with the existing urban area.

Having regard to the nature of the site, but notwithstanding the intention that it should provide a long term resource for growth extending beyond the plan period, it is important that an early commencement is This, as stated elsewhere, is in order to ensure that the Council can demonstrate a five year supply of housing land after adoption, as well as meeting the social and economic objectives of delivering new homes. The Local Plan should have regard to the phasing of delivery insofar as it should set out positive steps to ensuring that early delivery can be secured. In respect of the particular circumstances of Site WLP3.3 where Larkfleet control the majority but not all of the site, the Local Plan should positively indicate that the Council will not seek to delay the granting of permission or require a comprehensive proposal for the whole of the site providing that any phased proposal is in accord with a masterplan and does not prejudice or unduly burden the remainder of the development allocation.

Community Infrastructure

It is apparent from our public and stakeholder engagement to date that the delivery of a primary school, playing fields and public open space would be appropriate as part of Larkfleet's proposed development and would be welcomed by local. We have ascertained through discussion with the Beccles Medical Centre that additional facilities on the site would not be supported but that any additional capacity would be provided through expansion/improvement of the existing facility.

Whilst we have no objection in principle to the application of a Community Infrastructure Levy, we are pleased to note the Plan's acknowledgement that it may not always be the most appropriate method for securing infrastructure funding, in particular with respect to the larger site.
allocations Larkfleet's proposed development at Beccles seeks to provide a comprehensive sustainable new community. It will make provision for community facilities on site which benefit both the future residents of the development and those existing residents in the surrounding community. The community facilities it will provide - including a local centre, school, community/indoor sports building, playing pitches and a variety of public open spaces – would provide significant wider public benefits. Conversely, it would not generate any significant detrimental impacts on existing infrastructure which would require mitigation.

In this respect, it is considered that a Community Infrastructure Levy would not be appropriate in this instance due to its inflexibility and that a bespoke approach to Planning Obligations tailored to the specific needs and opportunities that the development gives rise to should be considered as more appropriate for such a development.

**Sustainable Transport**

As set out in the Council's SA, a development strategy which provides for significant growth at Beccles supports the aspiration of promoting sustainable modes of transport by ensuring local services and facilities would be available to new developments within walking or cycling distance and/or by extending or enhancing existing bus services.

The proposed development would provide the opportunity to make provision for cycle routes to connect with the existing cycle network and would enable improved connections between the town and the Ellough Industrial Estate and Enterprise Zone, thereby helping to promote more sustainable options for travelling to work at the Similarly, pedestrian routes within and adjoining the site would be enhanced. In addition, the development would make provision for enhancing and improving existing bus services in the area in order to provide a public transport service to/from the site and to connect with the town centre, the industrial estate and surrounding towns and villages.

Furthermore, Larkfleet's proposed development offers the benefit of making provision for community facilities as an integral part of the development which would ensure future residents would be well-served by the services and facilities offered by the development Likewise, these services would benefit those existing residents in the surrounding area and therefore promote a sustainable, walkable option for their service needs too.
Beccles Southern Relief Road

The forthcoming construction of the Beccles Southern Relief Road presents an opportunity to enhance the southern side of the town and the Ellough Enterprise Zone in particular by improving the access to and from the area, by reducing traffic congestion through the town and by removing the need for heavy goods vehicles to travel through the constrained roads through the town. However, as set out above, it is important that the SRR forms part of a wider highways strategy to ensure both that it remains appropriate to serve its purpose as a relief road (not a distributor road) and to ensure the development integrates appropriately with the existing urban area.

It also promotes the prospect of improving accessibility between the town and the Ellough Industrial Estate and Enterprise Zone by enabling improved cycle/pedestrian connections along Ellough. Larkfleet’s proposed development would further complement and supplement these connections and promote accessibility both from the proposed development itself and the wider town beyond.

Furthermore, the Relief Road itself would provide a physical and visual element of containment to the south of the town such that any development in this area would be clearly confined from the wider landscape and countryside beyond.

A Garden Neighbourhood

The preamble to draft Policy 1 advocates the application of 'garden city principles' in order to create an attractive and sustainable addition to the existing urban area. Larkfleet welcomes the application of these principles in terms of delivering a sustainable and inclusive community. As a housebuilder, Larkfleet has a track record of delivering sustainable new communities which reflect these principles.

The focus of these proposals is in creating a self-sustaining but well-integrated extension of the existing urban. It would make provision for a range of housing types and tenures and include a Continuing Care Retirement Community at its heart to meet the identified local need for sheltered and extra care housing. Larkfleet’s proposals would also make provision for key local facilities and services such as a primary school, community facility, local centre, sports pitches, playing areas and other public open spaces alongside the proposed employment allocation. The masterplanning focus has sought to create a community hub through the co-location of these facilities and the areas offering employment, rather
than interspersing them throughout the development.

It is proposed that the development would be served by a network of pedestrian and cycle routes which would not only ensure that the neighbourhood itself would be readily walkable but also provide opportunities to enhance links between the existing urban area and the Ellough Industrial Estate and Enterprise Zone which would better integrate this key employment area with the As set out previously, we would advocate a better integrated vehicular access strategy than presently envisaged in the Plan's indicative masterplan to ensure integration with the existing urban area allowing for an attractive public transport network.

The development would be supplemented by a comprehensive Green Infrastructure and sustainable drainage strategy which would complement and enhance the aspirations to deliver ecological enhancement across the site and connect with existing features and areas of ecological value.

The urban design principles for the development would seek to maximise the opportunities for high-quality and attractive open spaces to be integrated as part of the In addition, the proposed development would seek to deliver a form of development that provides a high-quality addition to the town and District's housing stock and an attractive and healthy new community.

4.0 CONCLUSION

There are a number of key points raised in our response that are summarised as follows:

* SPRU consider that the 2017 SHMA should not be considered to be robust for plan making purposes and should be updated with the most up to date information, reflect upon long term trends and the need to consider these and finally re-examine clearly worsening signals of housing affordability across the HMA.

* In terms of the strategy for the location of growth, we welcome the Council's approach which sees a proportion of growth being directed to the market towns and rural However, as previously advocated, we consider that a greater proportion of growth directed to these areas (in the order of 25-35%) would in fact have a greater positive impact.

* We welcome the proposed allocation of land to the south of Beccles and Worlingham but express reservations in respect of the proposed indicative masterplan – notably with regard to its technical robustness and potential
to impact on viability and deliverability of the development.

* An aspiration to maintain separation between Beccles and Worlingham is unfounded and unachievable but the character and local distinctiveness of the existing urban area - and character areas within it – are important qualities which are valued and can be maintained.

* There is a strong rationale to support the relocation of the proposed country park to a more central location within the wider allocation.

* Larkfleet's proposals offer the opportunity of early delivery subject to identified technical constraints and specific opportunities which have not yet been adequately addressed in the indicative masterplan included within the Draft Local Plan.

* The Council should adopt a bespoke approach to infrastructure contributions where on-site provision achieves greater public benefits.

* The Beccles Southern Relief Road provides an opportunity to enhance the southern side of the town and the Ellough Enterprise Zone in particular by improving the access to and from the area and also to provide a physical and visual element of containment to the south of the town such that any development in this area would be clearly confined from the wider landscape and countryside beyond.

* Larkfleet have a track record in delivering sustainable new communities and high-quality, innovative new housing. The application of ‘garden city principles’ to the proposed development will secure a well-integrated, accessible, attractive and high-quality new community and would also provide benefits to the existing community.

* The Local Plan should facilitate the early delivery of strategic development, specifically Site 3 to meet the objectives of the Local Plan and national planning policy.

* We welcome the opportunity to continue to work with the Council and local community to prepare an appropriate masterplan to secure the successful delivery of a new garden community for Beccles and Worlingham at the earliest reasonable opportunity.

Attached documents  
Leigh Barber

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 37

Comment
* Every point within the specific criteria uses the word 'should' within the specific criteria of the policy. If the policy is specific it determines the criteria should also be specific, should is not a specific word. With any form of acceptance criteria, it needs to be not open to mis-interpretation. 'Should' to be replaced with 'will' to provide the necessary reassurance.

* Analysis of the Options for the new Waveney plan – WLP3.1 amalgamates a lot of sites, the local plan does not highlight the results of the feedback. For instance

* Site 81/82 - Anglian Water stated that the development of the site would have a 'Red' impact on the water recycling centre capacity, an 'Amber' impact on the foul sewerage network and a 'Green' impact on their assets.

* Summary of site 81 - A significant negative effect identified the Sustainability Appraisal is on the impact on biodiversity due to the sites location close to a BAP site. Minor negative effects were identified in respect of the impact on the landscape and the loss of a greenfield site.

My concern here is this feedback is being overlooked for commercials sake, Beccles already suffers from flooding issues and this has the potential to escalate it further, the local plan should highlight this and the proposed mitigation. Mitigation measures should also be in place before the issue occurs, basic risk management. I do note Section 3.6 Infrastructure includes a long term solution for this, however assurance needs to be given it will be dealt with in parallel to new housing and not afterwards, the fear is that there is more incentive to build houses as that drives revenue for the council and building companies , where as facilities such as Water recycling is a large cost that no one will want to incur.

* Car Parking – During school holidays and weekends, Beccles car park situation is poor, the main supermarket is Tescos and that is full up as is Roy's car park, parking down Pudgingmoor is minimal with all other town
parking also difficult to obtain, adding a potential 1200 houses to Beccles with each house potentially being a 2 car family would only make this issue worse. How is parking proposed to be rectified? Could a Park and Ride system just off the A146 for instance be proposed? This has not even been considered as part of the infrastructure requirements.

* Congestion – the main traffic lights in the town centre failed on Saturday 29th July, causing the town to come to a stop for all vehicles, this was despite temporary traffic lights being installed, a normal 5 minute journey took over an hour and this continued to happen until at least Monday 31st. Beccles is not built for the existing traffic, the Southern Relief road, will hopefully remove the need for HGVs to drive through the town, however a majority of the traffic is people from local villagers/towns going to the supermarkets and using the town’s amenities, the Southern Relief road will not rectify this. This was also referenced in the local plan - A southern relief road is under construction which will take HGV traffic away from the town centre and this may improve pedestrian and cycle links to the employment area. Basically the impact the Southern Relief will have is currently theoretical, it is not known if this will mitigate any traffic issues as much as this plan claims it will.

* Local plan states - Traffic congestion is an issue for some parts of the town, such as around Ingate, and in this location there is a risk it could contribute to air quality problems. The proposed location of WLP 3.1 (largest sites 80/81) inevitably will force a lot more traffic through this area, despite apparent council mitigation proposals which do not seem to account people driving into town currently, let alone in the future.

* London Road itself is one of the quieter roads in Beccles, I frequently get on to it from Kemp Lanes with no cars coming in either direction, and this is in rush hour, leads me to believe the Relief Roads main purpose was to enable the future expansion of Beccles/Worlingham which is £7m well spent....
Leigh HOUGHTON

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  93

Comment  I am aghast at the planning proposals and object strongly to the layout . . It is far too close to existing boundaries and that only helps to elevate problems. . .other than it making it easier for the developers what is the need when there is all the space to join it to existing buildings?

Perhaps peruse the estate built in Runwell,Wickford, Essex . . .built away from existing properties so as to make the estate more exclusive and attract higher paid occupants rather than DSS which this developement will attract. Also being more exclusive and set away from existing property everyone was happy.

We know that a school is not going to be built . .who is going to pay for IT?

Medical problems are hardly being able to be dealt with now with existing medical centre not having enough doctors resulting in 25% too few doctor hours. . .how are they going to deal with upwards of 2000 extra people??

The roads in Beccles are already congested with numerous fatalities caused by traffic.

This developement will certainly help to further the degeneration of what used to be a pleasant town and for which Beccles is unable to cope with

I really do hope you reconsider this layout and do not but the estate up to existing property as the plan shows.
M Chatfield

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 257

Comment Regarding Worlingham Neighbourhood Development

It is certainly not a suitable layout for many reasons. The proposed numbers of residents are far too high, 1,250 means that most likely, at least 2,000 cars will be circulating our already congested town.

The sewage system in Worlingham will be unable to cope with such an influx.

Services such as doctors, police etc are already stretched to breaking point.

As for the strategy how will it improve the quality of life for people in Beccles to have a development (which will include, no doubt overspill from other Council areas) of this size. How will it improve the health of the population? & especially how will it protect and enhance the environment when it has destroyed valuable farm land?

Beccles is a rural historic market town & needs to be respected as such, all development should be sympathetically designed & in keeping with the town.

What we don’t wish is an over large homogenised "Garden City" design that is without character.

All this proposal seems to be based on profit, & not on consideration of residents.

As for the relief road, we were promised that the By-pass would solve all our problems, instead it is now much worse, bringing in cars to the supermarkets.

This latest proposed development will bring in problems with no answers.
Attached documents
Mark Langford

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  41

Comment  * I don’t see any provision for extra medical care, such as a new or expanded health centre.

* 1250 new homes will have anything up to 1000 children of *all* ages. A single 1.5 form primary school cannot cope with that, and the existing hogh school and free school are at their limits.

* This country is already suffering a shortage of agricultural land. Better to spread the new houses over existing brownfield sites, scattered around the area (there are lots of closed-down factories, warehouses etc). Brownfield sites already have decent roads, and utilities only need reconnecting or even just switching on.

* The plan seems aimed at elderly people moving into the area, not at local people already in desperate need of affordable housing. It would be young people able to drive the local economy, not retired people.
Marya Parker

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 439

Comment

I recognise the need for new housing and welcome the inclusion of housing suitable for older people, however I do not support the "ghettoising" of any section of the community. I believe a mixed community is more socially cohesive one, while still allowing for specialised housing to meet the diverse needs of individual households. Considering the growth in the older part of the demographic, there will need to be assurances that public transport will be provided to service this new neighbourhood to facilitate access to the town centre, bus and train stations. Similarly, as a new neighbourhood, links with existing community life of Beccles will need to be facilitated, for example, at a basic infrastructural level, through easy access by public transport to the Town and Village.

All Beccles residents will need assurances that medical facilities and services will be available on site, perhaps as an outreach from the existing medical campus. At the moment the existing health care is not meeting needs and expectations of the population as it exists now. Until extra capacity is secured there can be no further pressure from new development without exacerbating this situation to the detriment of all Beccles and Worlingham residents.

I welcome the retention and incorporation of natural features, existing and historic field boundaries and the inclusion of new green open space in the development. The new open space created should be of high quality in terms of both landscape and wildlife with creative planting schemes of native species. There should also be a creative and innovative approach to seating and the inclusion of public art. This must not be a cheap, bland "municipal" space but an interesting, stimulating space that encourages curiosity and provides for meaningful contact with nature for all.

Pleasant, safe cycle routes around the new neighbourhood and to the town are welcome. However the plan suggests road traffic will be encouraged to access Beccles by travelling westwards which would result in a substantial increase in traffic using London Road to access the Town and routes to
Bungay, Norwich and Great Yarmouth. The bottlenecks at Exchange Square and the Market Street/Smallgate junctions are already causing problems without further increase in traffic and there will be an unmet increased demand for parking. The plan does not appear to address this issue. It also highlights how essential it will be to have good public transport, such as frequent shopper buses.

see attached file "Comments on the first draft plan MP 1"
Matthew Loryman

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 88

Comment Hi, Although I currently live in Halesworth we are shortly going to be moving to Beccles and I volunteer regularly at Beccles library.

Having looked at the plan for WLP3.1 I have two major comments.

Firstly I would like to see a final design with high-quality features supporting active modes of transport such as cycling or walking. This is especially important for access from the development to the centre of Beccles and linking to the railway station.

Secondly I believe the proposed masterplan for the site could be improved by spreading the "green" areas across the site. Currently the Country Park area seems to be relatively inaccessible to much of the site. I would like to comment on moving two "blocks" of residential housing. These are (a) the residential area immediately to the North East of the western "local shops" area and (b) the residential area immediately to the North East of the proposed Primary School. I would propose splitting the area devoted to Country Park and replacing these two residential "blocks" with Country Park. This residential housing would then be placed within the area currently marked as "Country Park" on the map. I believe this would break up the areas of housing and create continuity of green areas with the "Park and allotments" and across the Primary School to the "Indoor and Outdoor Sport" area.

I have seen this kind of Country Park/sport/allotment co-location work really well in Pollok Park in Glasgow (close to where I formerly lived) and I think this approach here would enhance Beccles.

Additionally I am a Primary School teacher and I believe this kind of green axis across the proposed Primary School area would help create a really inspirational environment for the children. Again this is a strategy that I have seen work well for schools elsewhere.
Cheers

Mat

Attached documents
Matthew Robertson

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 617

Comment I am very pleased to see that you are making this area a proper living area, with facilities for young and old residents. My one concern is that there is no mention of a GP Surgery, which will clearly be needed here. It is good to see that the Southern Relief Road is at last being built, and there will be provision for cyclists.

Attached documents
Mr & Mrs M J Venn

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 363

Comment We live in Worlingham where you want 1,250 in the same period of new homes – this figure has now grown from 975 dwellings a number given by "Larkfleet" last year. This increase of 275 dwellings, which, of course, will increase on the final stages as have other developments! ie Ellough Road area under plan W3075/9! Obviously new homes are needed and our Parish Council quite rightly says "following a survey we need between 222 and 301 new homes rather than this many" – see Beccles & Bungay Journal August 18th 2017 page 22 under the heading "Waveney Local Plan could spell death of Village". Dwellings should be mainly, yes, mainly "affordable homes" for local inhabitants only as and when built over and above the statutory percentage of other homes.

When Larkfleet first drew up their plan, in addition to "proposed use" (in your strategy page 6 for Beccles and Worlingham), a new medical centre would be built - this has not now been included – why not? We are already five doctors short and no doubt that number will increase over time.

Attached documents
Mr and Mrs Broad

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 500

Comment We don't have a problem with the building of new houses just the quantity. Howe are our local services going to cope with 1,250 homes an increase from 975. When asked at the meeting held in the Public Hall on 8th August, where were they building the new Health Centre. The reply was that there will be no Health Centre, there will be an extension to the existing site. Just how do they propose to do that, and if they do, where are we going to get the extra Doctors from, the Health Centre is running with 5 doctors short now. Then there is the question of parking. Just where are patients supposed to leave their cars while attending an appointment. We have lost the Minor Injuries Unit and we are shortly losing the Phlebotomy Clinic. We have lost our police station. All this and then Beccles and Worlingham are expected to accommodate another 1,250 homes.

Then there is the question of the amount of traffic trying to get into Beccles. At certain times of the day now, the traffic going down Ingate backs up to the traffic lights at the end of Ellough Rd, this is from the direction of the proposed new site. What about schools. We had a primary school in Worlingham which has now been demolished. Has any thought been given to the impact this amount of houses will have on Worlingham and Beccles.

Attached documents
Mr and Mrs Pratt

Section
Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID
339

Comment
Below are our reflections after attending the information meeting at Beccles hall on the 8th of August regarding the first draft plan for the Waveney area. We live at St Paul's Close right on the edge of the area WLP3.1 in the draft local plan. We feel that no consideration has been given to the people who today are living on what would be the border backing on to the proposed development WLP3.1 The main reason we chose this location was to get away from the hustle and bustle of town life as we love the countryside and at the same time appreciate having the amenities of the town within easy reach. We have the pleasure of waking up to the songs of birds, stepping straight out into nature through the back gate and watching the different types of wild life that can be seen across the fields. When we purchased our property 1.5 years ago we realised through our property survey that there were plans approved for the ring road at the back of the fields and some development at Oak lane, between Ellough Road & Cucumber Lane, there were no plans for development on the fields bordering onto our property so we went ahead with the purchase. If the draft plan and especially the area WLP3.1 were to be approved then the decision we took 14 months ago was based on false information, a decision that would have been different today. We would become part of a sprawling urban area sandwiched between the old and the new. This might appear selfish but one trusts that when making one of the biggest decisions of your life then you can rely on the information supplied by the local authorities. The larger green areas marked on the draft plan are bordering on the new Ring Road & Ellough Road we would be looking at rows of new houses with few green areas. If this plan goes ahead than there should be more consideration given to the people losing the views that they have today. Why not a larger green area in between the old and the new with walking and sitting areas for all the local people to enjoy. We are well aware of the pressure put on local authorities to build new houses but some consideration must be given to the people living in the area today. If this large green area we suggest were to be the first part of the proposed
development then this would also soften the blow of constant noise pollution as well as other inconveniences from the ongoing building work, as we understand it this will be a development that would be ongoing until 2036. Why build so many properties in the same area? It is the equivalent of attaching a small village to Beccles. Why not keep the beauty of Beccles by building more smaller developments around the town and surrounding areas? Is the plan based on what is most practical for the authorities? Once again it seems like very little consideration has been given the present people that inhabit this area.

Attached documents
Mr N & Mrs M Godfrey

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 220

Comment Too many houses in this area. They should be spread over a larger area preferably on the main road. There already is too much traffic on Ellough Road. Beccles cannot cope with extra volume of traffic. Not enough car parks in Beccles. Not enough doctors in Beccles.

Attached documents
Mrs Hilda Jackson

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  592

Comment  I agree with and applaud the selection of these sites. The provision of the Southern by pass makes their selection logical and sensible. The provision of amenities and infrastructure proposed should mitigate against the reluctance of some people to accept large scale building projects.

Attached documents
Oakley

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 613

Comment I would prefer to see an area specifically identified for the retirement village. It’s something that’s desperately needed in Beccles and would help free up family homes too. Is there any way of ensuring that a specific parcel of land can only be used for this please?

I've also seen a recommendation that the road junction at the bottom of Ashmans Road is improved. Please can Ashmans Road then have a weight limit applied to it to stop the HGV's that use it as a rat run currently, which one assumes will get worse. Equally can it have some chicanes to slow the speeding traffic?

Attached documents
Nicky Elliott

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1273

Comment If Beccles and Worlingham are to have 15% of the allocation, then I agree with the preferred location option detailed in policies WLP3.1 and WLP3.2, and the employment land allocation detailed in policy WLP3.3.

I support the garden neighbourhood masterplan for policy WLP3.1, and agree that access directly from the existing town boundary into this area should be for cycles and pedestrians only with cars entering and exiting via the southern relief road. However I think provision should be made to allow local town buses access from the existing town boundary via a bus gate or similar. The school should be carefully designed and located to encourage cycle and pedestrian access and discourage private car use. I would like to see a large supermarket located near one of the roads in the area as well as small shops, as this will reduce cars travelling through Beccles to the existing supermarkets to the north of the town. I would also like to see a pub in this masterplan. I welcome the allocation of green space in the plan, and would like to see an upper limit to the total number of houses imposed for the area covered by policy WLP3.1. I also think there should be a health centre located in the southern part of Beccles and Worlingham to serve the new development area as well as the southern part of the existing town and satellite villages.

Attached documents
Paul Leman

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  505

Comment  Adding to towns and villages with already overlooked infrastructures is not a good thing. This policy is making the best of a bad job.

Attached documents
Rachel Knight

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 835

Comment This proposed development is far, far too big for a town the size of Beccles. The proposals are to turn food producing land into homes for people but what they are all going to do is a mystery as there is great unemployment problems in the wider area. The wider infrastructure is atrocious with no decent connections to anywhere (Norwich, Ipswich, Bury St Edmunds, London as well as the wider country) and no plans to upgrade them. Until there is a plan to dual these roads (A12, A47, A146, A143) this area of the country cannot support this size of development. One relief road, that is long overdue, is not going to solve the traffic issues in the area and this development would make it even worse than it is now even with the new road. Also with the current infrastructure there is not going to be the inward investment to provide jobs for all these people. Until the government guarantees (100%) to provide funding for the roads that are needed in this area we should refuse to build more houses as the area cannot cope. We should not be building on arable farmland either - this area is renowned for its fertile land and it will be needed to feed the country, especially as we leave the EU and to build on this land is short-sighted. This plan seems to show desperation to fulfil a quota with no thought of the effect that it will have on Beccles and the surrounding area.
River Waveney Trust Andrew Mackney

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 912

Comment WLP3.1 Beccles and Worlingham Garden Neighbourhood

The site specific criteria should be expanded to include requirements for:

(a) A sustainable drainage scheme, and a cross reference included to policy WLP8.29, as amended (see below). The development brief should have regard to the Water Cycle Study suggested policy 'SMW2 – SuDs and Green Infrastructure'.

(b) Green infrastructure should be designed to increase biodiversity and create wildlife corridors.

We are aware of the potential capacity constraints at the Beccles/ Marsh Lane Anglian wastewater facility and consider that ideally no development should take place until improvements there are complete, particularly given that the River Waveney only has a Moderate ecological status, indicating its relative vulnerability. At the very least, before the start of development improvements to the facility should be underway or agreed and funded, and a strict phasing plan agreed.

WATER CYCLE STUDY

Recommended policies referred to in the text:

SWM2 – SuDs and Green Infrastructure

Where possible, developers should ensure linkage of SuDS to green infrastructure to provide environmental enhancement and amenity, social and recreational value. SuDS design should maximise opportunities to create amenity, enhance biodiversity, and contribute to a network of green (and blue) open space.

Attached documents
Rosemary Shaw

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1038

Comment I support the development of this site as it has excellent transport links with the southern relief road and enables a joined-up plan for the development of a significant number of houses together with essential local amenities. This is considerably better than a patchwork approach in smaller sites without space for schools, shops and recreation. I support the provision of cycle and pedestrian links directly north with vehicular traffic via the southern route. This will prevent the town becoming blocked by motor traffic owing to the large number of additional houses. The plan preserves necessary natural features, such that the garden neighbourhood should be a pleasant place to live.

Attached documents
Rosemary Simpson

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  144

Comment  I do hope that the Council are working with Suffolk Wildlife Trust to ensure safe pathways for wildlife. And the country park is not only for dog walking but for the whole community to enjoy.

Attached documents
Rosemary Simpson

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 146

Comment It would be good if the country park had a destination ie a café provision and car parking.

Attached documents
Rosemary Simpson

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 140

Comment WLP3.1 Along the Southern relief road it would be much better for the environment to have low level lighting or no lighting, just very low level for the pedestrian and cycle route.

Attached documents
Roy Hammond

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 211

Comment Over developed monster. Services can’t cope now. How many on the planning committee live in the affected area.

Also it was said one of our local Councillors voted for this monster do that person live near the planned development.

Attached documents
S J Williams

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 342

Comment

What proof do Waveney have that the land set aside for employment will be successful?

We moved to Worlingham many years ago as we wanted to get away from the hubbub of London and city life and if this proposal succeeds it looks distinctly as if we will find ourselves in the same position as we were in when we moved out of the city.

Furthermore, when speaking to one of the members of Waveney District Council at the Public meeting in Beccles last week I was informed and assured by him that the whole development would not be complete until 2036 and this timescale was repeated to me constantly giving me the impression (to which I take exception) that in view of my age it would not concern me as I would probably not still be around when completion of these proposals were effected. However I do consider that if the plan does succeed then it will affect me as the work will commence well before 2036 which will result in pollution of the air and disruption in peoples daily living. Are the Council going to be prepared to supply facilities to those residents who have severe breathing problems whilst the work is undertaken.

Attached documents
Stephen Bartholomew

Section Policy WLP3.1 - Beccles and Woringham Garden Neighbourhood

Comment ID 1066

Comment We lived in Field View Gardens, Beccles for 26 years. Thank god we had the means to get out before this lunacy was put on the drawing board. It is obvious the Beccles Town Council (people who live in the town) are being ignored and potentially being overruled by the Waveney District Council in the face of what this government is proposing for many communities.

site specific allocations issues and options report compiled by Waveney District Council -

The proposal to put forward the beautiful grade A agricultural land (greenbelt) development possibly for up to 900 houses? A commuter town created at a stroke, changing the character of the area. Would this just solve a housing shortage in the Waveney area or for all comers?

Not only will it create an "eyesore", but also create potential problems such as:-

• Possible flooding to property. these fields have acted like a "sponge" in times of heavy rainfall . Concrete and tarmac over such a vast area could cause "run-off" as future rainfall is predicted to become more erratic,

• traffic noise and pollution in what is now a tranquil and relatively crime-free area to live. I believe the majority of residents are here because it is such a pleasant area in which to live.

• It would drive away the wildlife which frequent these fields, for example I often heard skylark song. These birds have suffered a dramatic population crash in recent years. Will this be just another case of habitat destruction?

• Surely we still need agricultural land or is the whole population overfed/not requiring alternative crops such as oil seed rape? I don't think so.

• The infrastructure of the town can hardly cope with the volume of traffic now, let alone catering for another 5,000 population. Have any of the
proposers of this plan tried to drive through Beccles, via Ingate, where at peak times severe delays occur. There is no other sensible option for accessing town from this part of Beccles. At peak times, the Town Centre is also log jammed with traffic. Where are the vehicles going to park? After all the streets in the Town Centre of Beccles were originally designed to cater for the horse and cart. I predict if these proposals are put forward without major infrastructure change the traffic problems will be as bad as those currently experienced in Lowestoft.

• Presently, Beccles Health Centre is "bursting at the seams" with patients due to lack of senior medical staff. How is this going to be solved?

• Employment opportunities are limited within the Beccles area. Are your proposals just creating a commuter town for elsewhere without thought for the local area.

• We believe a downgrading of the proposals are required and more thought required about the major impact such a development would have on the area.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1713

Comment New residential allocation (up to 1250 dwellings) south of Beccles and to the north of the new South Beccles Relief Road (SBRR). Also incorporating some employment land. The masterplan (below) has access from the SBRR. These links are not part of the current design, but could (subject to design considerations) be incorporated. Pedestrian and cycle access to Beccles required, but not vehicular links to the residential areas to the north. Employment land has a separate access onto Ellough road, consistent with other neighbouring sites. SBRR separated by a landscape buffer so unlikely to be subject to a reduced speed limit, so the access junctions would need to be designed accordingly.

Full Transport Assessment and Travel Plan required

Attached documents
**Suffolk County Council Robert Feakes**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood</th>
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<td>Comment ID</td>
<td>1674</td>
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<tr>
<td>Comment</td>
<td>Number of surface water flow paths through the site, if discharging surface water via watercourses we would look for betterment from pre-developed rates</td>
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Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1259

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the retention of existing natural features as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Tracey Clark

Section  Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID  566

Comment  I have just looked at these Beccles plans for new houses, this is at the end of my quiet road, I bought this house 10 year ago because it was on a quiet road. This will effect that plus the price of my house. Please do not over crowed our quiet safe town. The schools are all ready at breaking point, and don’t start me off on the poor doctors, were we already have to beg to be seen. No more houses!!

Attached documents
Waveney & Yare Housing Association Ltd Jonathan Blankley

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 589

Comment On the face of it the plan looks reasonable, although I wonder how much open space will eventually be lost once the developers start to get involved. I am concerned that there is not enough thought going in to the social/leisure aspect of the development. Worlingham does not have a focal point or even a pub, and provision for at least one if not more pubs/restaurants is crucial. The provision of retail outlets is also important, but it has to be more than the standard; corner shop, hairdressers and fast food outlet. Perhaps the employment area could be extended to include some larger retail outlets combined with a decent sized parking area and a regular bus service into the centre of town which would provide alternative parking for those employed in the town and a link between the two areas.

My other concern is the mix of properties to be built. Looking at much of the recent development in the area, too high a proportion has been of larger properties that attract new people into the area, thus exacerbating the housing shortage problem. The focus has to be on meeting the needs of the existing population, both young and old, and NOT on maximising the developers profits. There is a distinct lack of smaller, affordable housing (either to buy or rent) for young individuals or couples starting their own lives. At the other end of the scale there is also a lack of suitable accommodation for those looking to downsize into properties that will meet their long term needs in later years.

Whilst I accept that there has to be a mix of properties to cover a range of needs, this is the one foreseeable opportunity to significantly improve the overall mix of properties locally, and ensure that it is fit for purpose in the long term. Failure to do so would not be acceptable, and have a detrimental effect on the generations to come.

Attached documents
Worlingham Parish Council Lesley Beevor

Section Policy WLP3.1 - Beccles and Worlingham Garden Neighbourhood

Comment ID 1554

Comment The Parish Council wish to provide the following observations in relation to the First Draft Local Plan consultation documents, in particular to the proposed Strategy for Beccles and Worlingham. The Council's key concern is specifically to the proposed Beccles and Worlingham Garden Neighbourhood allocation reference policy WLP3.1.

This allocation for 1250 dwellings, which includes proposals for care homes, a new primary school, country park, shops, a community centre and employment development, raises a number of concerns which are discussed as follows.

Proposed Strategy

Attention is drawn first to the content of the Local Plan First Draft Strategy for Beccles and Worlingham. The following comments are general observations but considered in more detail later in this response.

At paragraph 3.1 the District Council indicate that they will seek to retain the individual identities of the two settlements. Policy WLP3.1 singularly fails to do this in its present form and clearly result in coalescence of the Beccles south east urban area with the south west area of Worlingham. In effect it will be a continuous urban area lacking individual identity.

The Council would also dispute that the proposed level of growth will be similar to that experienced in the past 20 years within Worlingham.

Under paragraph 3.4 it is suggested that WLP3.1 is a "logical extension to the town .... ". Again, this point is strongly disputed ... perhaps on plan it appears logical but as noted above removes the distinct area of separation between Beccles and Worlingham. The District Council seem to perceive the allocation as a convenient "infill" site whilst ignoring the harm caused by the loss of village character and identity.

Although accepting that the land in question is not zoned as a high value
landscape area it does represent a large open area of countryside which, in the Parish Councils opinion, should be kept free of development for its own sake and preserve the distinct identity of the two settlements.

The reference to the "Garden City Principle" of the development also seems strange in the context of the locality. This is already an area with rural character and no amount of landscaping or open space can disguise the fact that the allocation is for a large urban extension removing the existing rural character of the area and therefore harming the setting of the two settlements. It is not "a sensible" location to focus growth as suggested.

Under paragraph 3.8 further justification for the allocation is provided suggesting that the eastern part of the site has undergone "significant changes" and lacks landscape features. Unfortunately, this is more due to modern farming practices and does not in itself provide a reasonable justification for the allocation. Although noting that the presence of the Southern Relief Road will have some impact on character, extensive landscaping on either side of the new road would ensure that rural character is maintained in this location. In fact, the relief road will provide opportunities to restore previously lost natural landscaping. Again, creation of the road does not provide justification for the allocation.

At paragraph 3.9 the site is promoted as having "substantial green infrastructure" – it seems perverse to promote a large urban extension on the basis it will provide green infrastructure. This does not mitigate the loss of open countryside.

Paragraph 3.14 suggests that the layout of open space within the site should be used to help protect the separate identities of the existing built up areas. This aspiration however does not assist in protecting the existing distinct character of Worlingham and simply acknowledges that the Parish boundary traverses the site.

It is also suggested that the site should be served by two accesses onto the Beccles Southern Relief Road. This rather highlights the existing issues with traffic movement within Beccles and Worlingham but exactly how will the new development integrate with the existing settlements. In effect the development becomes somewhat isolated and is almost a separate entity in itself. New occupiers of the site will simply seek other vehicle routes into Worlingham or Beccles via either Ellough Road or presumably London Road? Alternatively, the relief road will simply be used as an access to obtain services and work elsewhere, away from the area, hardly benefitting the local economy or representing sustainable development. The
suggestion that the majority of people will either walk or cycle from the site into the main settlements is fanciful.

Need for Housing

The Parish Council query the level of required housing proposed for Worlingham. As noted, within the conclusion to the Worlingham Housing Market Assessment February 2017, the required housing supply for the next twenty years varies from 222 – 301 dwellings depending upon which model is used for calculation but even taking the highest range of 301 dwellings this is significantly lower than that proposed under policy WLP3.1, of which 400 dwellings are to be allocated to Worlingham.

Allowing for windfall development the actual level of housing allocated for Worlingham should be somewhat less than 301.

The Draft Local Plan indicates that up to 1100 of the 1250 dwellings proposed will be completed during the Plan period. Could the allocation therefore be reduced in size on that basis? Of more concern is that the development could actually result in greater numbers than 1250 as different developers seek to maximise returns from the land and in reality, the 1250 dwellings suggested is therefore indicative only. How will the District Council ensure that the proposed figure is retained as the maximum figure?

It should be noted that the parish council has received over 585 letters objecting to the number of dwellings being suggested in the Draft Local Plan and these letters, together with a petition containing over 380 names are included as part of this response.

Coalescence and Environmental Impacts

As noted the proposed allocation is considered to eradicate the sense of openness and separate settlement identities which currently exists to the southern boundaries of Beccles and Worlingham. The impact would be particularly damaging on the land between Ellough Road to the east and Queen Elizabeth Drive to the west, which plays a key role in maintaining separation. Although it is acknowledged that the allocation will contain a country park, playing fields and landscaped areas, this does not mitigate for the loss of what is currently open countryside. As noted the impact of the Southern Relief Road can be mitigated with landscaping and should not be used as part of the justification for the allocation.

The Parish Council believe that the land should be allocated as a strategic
green gap which reflects the guidance provided within the National Planning Policy Framework (NPPF). At paragraph 17 the NPPF refers to Core Planning Principles and in relation to local character states that planning should:

"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it"

In the case of policy WLP3.1 this fundamental principle appears to have been ignored as the policy fails to take into account local character as well as the intrinsic beauty of the countryside. As previously stated although the existing landscape is not identified as high value it does play a key role in maintaining the existing character of the two settlements.

Other environmental impacts which concern the Parish Council include impact on existing wildlife and habitats - again although the proposed allocation seeks to incorporate a country park and landscaped areas it will not mitigate for the loss of such an extensive area of open countryside and associated impact on the natural environment. Surface water drainage and potential flood impact are also matters which should be fully assessed before the site is considered further for development.

Traffic Impacts

This response should also be considered alongside a separate Traffic Impact Assessment currently being prepared by the Parish's transport consultant (to follow as agreed). [see attachment added 07/11/2017]

The Parish Council have significant concerns that the existing highway network within Worlingham and Beccles cannot cope with the traffic movements which will be generated by the level of development proposed. Both settlements already suffer from regular traffic gridlock and poor through traffic movement. Without significant improvements to highway infrastructure the proposed development will exacerbate the current position.

The proposal, to serve the new development direct from the new Relief Road, will simply divert traffic to finding new routes into Worlingham and Beccles such as Ellough Road which cannot cope with level of traffic expected to be generated. The expectation that people will use cycles or walk to their destination is a commendable aspiration but the reality is that the majority of householders will rely on a car and existing traffic problems
will simply increase in time.

Lack of Health Facilities

Although noting that WLP3.1 will accommodate new care home accommodation the Parish Council are extremely concerned that the proposal does not seek to include a new community health centre. It doesn’t seem feasible that with existing health care in the area already under pressure that the additional 1250 dwellings and care homes will not generate the need for a new facility. Presumably the NHS have been consulted through the current process? There is no reason why future developers of the site should not be expected to contribute funding for new health facilities either via the CIL process or section 106 agreements. The Parish Council request that this funding is secured if ultimately the allocation is confirmed.

Employment Provision

The additional employment land located to the south-east corner of the site appears as an extension to the existing Ellough Industrial Estate. It must be questioned as to whether there will be demand for such an allocation or alternatively whether allocation WLP3.3 will provide sufficient land for the Plan period to allow the expansion of the existing industrial estate further to the south and away from the proposed residential areas. This would provide greater flexibility in being able to expand the size of the proposed country park and allow consideration of a more formal strategic green gap which would ensure that the two settlements retain their separation and character.

Alternative Sites

The Parish Council are disappointed that the current allocation, as well as other allocations, are clearly now being promoted as the District Councils preferred allocations despite a number of other suggested sites originally being promoted by the Parish and other third parties. Alternative sites have been relegated to Appendices of the Strategic Planning Consultation document which suggests the proposed options are something of a "fait accompli" and consideration will no longer be given to them.

Originally, one site preferred by the Parish Council is site 62 which would have the capacity to provide much of the required housing development over the next 20 years as well as helping to maintain the separate identity of the village.
Responses to Waveney Local Plan First Draft | Consultation period 28 July to 22 September 2017

The District Council suggest that development of site 62 would harm the setting of Worlingham Manor and may be affected by existing industrial premises. The impact on Worlingham Manor would be no more harmful than that caused by existing developments located on Garden Lane, Cedar Drive or even College Lane itself which are located a similar distance from Worlingham Manor. A suitable landscape buffer could be incorporated to further protect the existing setting. It is not the case that the impact of development on site 62 could not be satisfactorily mitigated as suggested by the Council.

Similarly, additional landscape buffers could be provided to separate new residential dwellings from the existing industrial estates or incorporate low impact office development to the eastern and southern boundaries of site 62 to further reduce impact.

The District Council also refer to the fact that using alternative sites to site WLP3.1 would involve several different landowners bringing with it the risk of disagreement between landowners. The Parish Council would suggest that only very limited weight can be applied to this reason for not considering other alternative sites. The harm caused to the separate identities of Beccles and Worlingham must outweigh issues of land assembly which could potentially be solved via Compulsory Purchase Orders in any event.

As noted from the range of sites promoted within the southern part of Beccles, either side of London Road, there are a number of options over and above allocation WLP3.2 which would provide the required dwelling numbers for Beccles without the need to consider site 82. Noting the District Councils concern that these alternative sites would cause "exposed edges to the landscape" - surely the impact cannot be worse than that caused to the character and identity of Worlingham if site 82 were to proceed.

The Parish are also concerned at the suggestion that by having "dispersed sites" rather than a single large allocation this undermines the possible provision of a primary school and other infrastructure. There is no reason why having two or three separate allocations cannot all contribute to necessary infrastructure requirements through CIL or s 106 agreements. Once again this justification for site 82 does not outweigh the harm caused to loss of character.

Conclusion

In conclusion the Parish Council therefore wish to state their strong
opposition to policy WLP3.1 and suggest that consideration should be given to alternative development sites.

The NPPF at paragraph 7 identifies the three key dimensions to sustainable development which for planning means providing an economic role, social role and environmental role. With regard to the economic role planning should be:

"contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

It must be questioned as to whether, with policy WLP3.1, that the right place for development has been selected as the Council's preferred option. Although accepting the site provides an easier option in terms of dealing with fewer landowners and perhaps in securing developer contributions more easily this does not outweigh the fact that this is the wrong location for development.

In terms of a social role planning should be:

"supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that respect the community's needs and support its health, social and cultural well-being"

As noted WLP3.1 does not respect the community's needs in terms of location, it provides significant over provision of dwellings for the Plan period and fails to provide a new health care facility which will place even further pressure on existing facilities.

In environmental terms planning should be:

"contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy".

Again the proposed allocation fails to meet this aspiration and will in fact lead to coalescence between Beccles and Worlingham, whilst causing significant impact to existing wildlife and habitats.
The proposed allocation therefore does not meet the three dimensions of sustainable development as established by the NPPF and the District Council are requested to now consider alternative site provision.

Addendum by Waveney District Council

See attachments for various forms submitted as part of the Worlingham Parish Council response:

Save our Town and Village petition: 389 signatories

Death of our Village: 84 forms

Save our Village: 125 forms

Larkfleet Homes Death of our Village: 282 forms signed (as objections) and 2 forms annotated in support

A number of emails to deathofourvillage@hotmail.com comprise 84 objecting and 2 supporting and emails to worlingham@hotmail.com comprise 13 objections.

Update 07/11/2017: Transport Impact Assessment received 03/11/2017 [see attachment]

NB comment from Worlingham Parish Council Clerk: Please find attached.
Where the report mentions London Road South, this should read London Road.

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/136282/PDF/-/8730741%201%202017%2010%2005%20
Policy WLP3.2 - Land West of London Road, Beccles

Beccles and Bungay Cycle Strategy Ian Reid

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 1019

Comment Policy WLP3.2 – proposes a housing allocation to the west of London Road, Beccles. We request that this development has cycle and pedestrian access into the end of Meadow Gardens but NO motor vehicle connection at this point. Additionally, a direct cycle and pedestrian connection should be provided from the new development to the shared use path that leads to the Kemps Lane railway bridge. This should include a relocated central refuge to allow for safer crossing over the A145 for cycles and pedestrians.
Beccles Town Council C Boyne

Section: Policy WLP3.2 - Land West of London Road, Beccles

Comment ID: 1148

Comment:
The council is in favour of the proposed option detailed in policies WLP3.1 and WLP3.2 as it believes that these options are the most likely to deliver the infrastructure that the town needs and would have least impact on the road network. Council has made a number of suggested changes to the policies in order to strengthen the constraints placed on the development and agrees with the principle that the only car access should be via the relief road and the need for retail, school, and leisure facilities on site to minimise the traffic coming into Beccles. Council supports the concept of cycle and pedestrian routes leading into the new development, and would also like to see ‘Bus Gates’ introduced to allow the development to be serviced by buses.

This would not only help in reducing car movements but would also assist with keeping the town bus routes economically viable.

Attached documents
Charles Fortt

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 599

Comment I support policies WLP3.1, WLP3.2 and WLP3.3.
Clare Mackney

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 735

Comment No development should be permitted on the Garden Neighbourhood and London Road sites until the infrastructure constraints identified above are fully resolved (see representation against WLP3.1).

Attached documents
Environment Agency

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 871

Comment We welcome the statement that a full risk assessment and remediation strategy will be required in relation to the petrol station within the proposed site. It should also be noted that any extension to the cemetery in the site will require a tier 1 groundwater assessment in order to safeguard groundwater.

Attached documents
Graham Jackson

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 601

Comment I fully support and commend the Local Plan as it applies to Beccles and Worlingham.

The First Draft Plan correctly, in my view, recognizes the opportunities resulting from the opening of the Southern Relief Road and the proposals for WLP3.1, WLP3.2, and WLP3.3 are logical outcomes based on the concept of a Garden Neighbourhood.

I applaud the proposed extension to the Beccles Medical Centre especially if vehicle parking can be extended.

Attached documents
**Historic England**

**Section**  
Policy WLP3.2 - Land West of London Road, Beccles

**Comment ID**  
1385

**Comment**  
This site is adjacent to the conservation area boundary and is an opportunity to enhance the conservation area. The conservation area is identified in the supporting text but not within the policy and the opportunity to enhance along the London Road has not been explored, although we note proposals to extend the cemetery, which is partly in the conservation area, in the northwest of the site.

**Attached documents**
James Harvey

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 330

Comment We live on London Road, Beccles. The new plan will be behind our property and thoroughly spoil our view and our attraction to the property. Maybe even decrease its value.

More importantly, there are 3 Major Trunks pipes running through the field and into our garden. We are in the process of Legal Action regarding these pipes. Waverney Council need to address this major issue before granting building consent!!

Attached documents
Jim Girdwood

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 1536

Comment With reference to WLP3.2, we were told there would be landscape buffers on the west and south sides of the housing site and wish to request that there will also be one on the east side, which is the only side facing other houses.

Attached documents
McGregor

Section
Policy WLP3.2 - Land West of London Road, Beccles

Comment ID
176

Comment
Any guarantees of protection for the existing trees on this site. It is a haven for muntjac and deer so their habitat is threatened.
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<th>McGregor</th>
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<td><strong>Attached documents</strong></td>
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Nicky Elliott

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 1274

Comment If Beccles and Worlingham are to have 15% of the allocation, then I agree with the preferred location option detailed in policies WLP3.1 and WLP3.2, and the employment land allocation detailed in policy WLP3.3.

Policy WLP3.2: I would like to see additional pedestrian & cycle access facilitated at the south-eastern end of the site, to link across London Road via a central island to the cycle path leading to the bend in Kemp's Lane.

Attached documents
Rosemary Shaw

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 1037

Comment Development of the site covered by WLP3.2 should have vehicular access exclusively to/from London Road and not Meadow Gardens. I welcome the exclusion of sites 145, 174 and 24 for the reasons stipulated in the draft plan. Any vehicular connection of WLP3.2 with Meadow Gardens (or with Ringsfield Road via the excluded sites) would be likely to produce deleterious traffic levels as those roads, unlike London Road, will not connect with the Beccles Southern Relief Road.

Attached documents
Rosemary Simpson

Section  
Policy WLP3.2 - Land West of London Road, Beccles

Comment ID  
139

Comment  
WLP3.2 To the north of this. Will there be buffer land between the track and development?

Attached documents
Suffolk County Council Robert Feakes

Section  
Policy WLP3.2 - Land West of London Road, Beccles

Comment ID  
1714

Comment  
Main access from A145 New footway along site frontage plus sustainable links, such as new off-site rights of way into the countryside

Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 1675

Comment Risk of surface water flooding (1:100) on site along London Road

Attached documents
Susan Doherty

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 208

Comment Plots 145, 43, 156, 24, and 108 surface water will no doubt be directed into the main storm drain which runs, from M and H plastics, under the railway line at Gosford Road, through to the lagoon at Morrisons and eventually to the river. Should this be the case, the heightening of this gully will be essential, as the last time this was done was during the 1960’s. This is Anglian Water’s responsibility.

Attached documents
Susan Workman

Section Policy WLP3.2 - Land West of London Road, Beccles

Comment ID 234

Comment London Road – 250 houses to much traffic down through town.

Attached documents
Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Beccles Town Council C Boyne

Section
Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID
1152

Comment
Policy WLP3.3 should include provision for a cycle link from the new roundabout at the Southern Relief Road/Ellough Road junction, along the side of Benacre Road to the existing roundabout junction with Copland Way, and along Copland Way as far as the entrance to Beccles Business Park.

The required upgrades to the electricity network to the east of the town to serve the new employment and housing growth are welcomed and should be stated in Policies WLP3.1 and WLP3.3.

Attached documents
## Broads Authority Natalie Beal

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>495</td>
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<tr>
<td>Comment</td>
<td>The Beccles and Worlingham Garden Suburb, together with Land west of London Road, Beccles total 1500 dwellings. The significant population increase would suggest added recreational pressures on nearby Broads sites particularly in the Waveney valley for which landscape mitigation would be needed.</td>
</tr>
<tr>
<td>Attached documents</td>
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</table>
Charles Fortt

Section Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID 600

Comment I support policies WLP3.1, WLP3.2 and WLP3.3.

Attached documents
Graham Jackson

Section  Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID  603

Comment  I fully support and commend the Local Plan as it applies to Beccles and Worlingham.

The First Draft Plan correctly, in my view, recognizes the opportunities resulting from the opening of the Southern Relief Road and the proposals for WLP3.1, WLP3.2, and WLP3.3 are logical outcomes based on the concept of a Garden Neighbourhood.

Attached documents
New Anglia Local Enterprise Partnership Eunice Edwards

Section Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID 1542

Comment New Anglia Local Enterprise Partnership is working with Waveney District Council and other partners to regenerate and deliver jobs in the Great Yarmouth and Lowestoft Enterprise Zone. Four sites, identified within the draft Plan, have Enterprise Zone status. These sites have benefitted from local development orders and, until March 2018, also benefit from business rate relief up to a value of £275,000. New Anglia welcomes the identification of these sites in Ellough.

New Anglia welcomes the promotion and protection of this site for employment purposes by policies WLP8.12.

Attached documents
Nicky Elliott

Section  Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID  1275

Comment  If Beccles and Worlingham are to have 15% of the allocation, then I agree with the preferred location option detailed in policies WLP3.1 and WLP3.2, and the employment land allocation detailed in policy WLP3.3.

Policy WLP3.3 should include provision for a cycle link from the new roundabout at the Southern Relief Road/Ellough Road junction, along the side of Benacre Road to the existing roundabout junction with Copland Way, and along Copland Way as far as the entrance to Beccles Business Park. I agree with the stated requirement of an upgrade to electrical supply in this area to support the growth of employment and new housing.

Attached documents
Norman Castleton

Section Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID 563

Comment Land South of Benacre Road at Ellough Airfield, Ellough

When this agricultural land is built on there will then be an excuse to build further afield because of the proximity of other building business or domestic. This is a never ending argument. It is no reason to build on this site or any others of a similar nature. Brown field sites only.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough

Comment ID 1715

Comment Access from Benacre Road

Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP3.3 - Land South of Benacre Road at Ellough Airfield, Ellough</th>
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<tr>
<td>Comment ID</td>
<td>1676</td>
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<tr>
<td>Comment</td>
<td>Pockets of surface water flood risk (1:30) to consider, if infiltrating will need an assessment for suitability given previous land use.</td>
</tr>
</tbody>
</table>

Attached documents
Strategy for Halesworth and Holton

4 Towns Crime Prevention Team Alastair MacFarlane

Section Strategy for Halesworth and Holton

Comment ID 329

Comment Hill Farm Road, Halesworth, residential development.

My concerns focus on this development, that I believe has inadequate access for so many extra houses.

The existing, only road is already cluttered with parked vehicles outside the present homes. It is narrow and simply will not cope with builders vehicles and extra equipment. The access points onto the development are barely wide enough for large vehicles, and the addition of traffic to and from the completed houses will cause problems, in both directions. At the very least, a further access road, onto Holton road needs to be built. Holton Road and Quay street, plus the low rail bridge, already congest. There is no bus service, as double-deckers are denied access, by the rail bridge. A single-decker service would solve that problem.

To sum up the structural aspects of road access are not covered properly. Other infrastructure factors remain unresolved. Education, medical services, sewage and current bus services. Shop friendly, free parking, in the town and employment opportunities for all.

The key infrastructure improvements that you list need to be in place, before the houses planned are occupied.

Attached documents
amanda crane

Section  Strategy for Halesworth and Holton

Comment ID  690

Comment  I attended the meeting on Thursday night at Edgar Sewter School and I found it both interesting and informative. As much as I would love for my town to remain small and personal I realise that it needs to continue to change and grow to keep 'alive'.

Attached documents
Anne Smith

Section: Strategy for Halesworth and Holton

Comment ID: 1033

Comment: I believe that the infrastructure in Halesworth and Holton is completely inadequate for the number of properties proposed. Whilst there are some plans for minimally increased infrastructure, these will, in no way, cope with the seriously increased population.

The proposals would involve a huge percentage increase in population in a small town like Halesworth, far in excess of what would normally be considered an acceptable increase.

Halesworth is situated about 25 miles from any hospital/A&E. Surely it does not therefore make any planning sense at all to create such an increase in population in such an area.

Harrisons Lane is quite unsuited to the increased usage which it will see. The junctions between Harrisons Lane and both Norwich Road and Bungay Road, Holton will be completely inadequate. Traffic heading north along Norwich Road and turning right into Harrisons Lane will cause such a tailback on Norwich Road as to be totally impractical.

National Cycle Route 1 travels along Harrisons Lane and should not, under any circumstances, be compromised.

The local plan includes a mishmash of sports provision, as far as both location and operators are concerned. Surely this is the time for the local organisations to be required to work together, in the interests of the people of Halesworth.

I believe that the large area of the ex middle school playing field which is being proposed as ‘care facility and retirement community’ is subject to C2 classification. How will this be complied with and who will ensure that it does comply?
Attached documents
Chris Davey

Section  Strategy for Halesworth and Holton

Comment ID  270

Comment  Hill Farm Road development

The proposal for a 4 year build time for this development means that local residents will suffer disruption, inconvenience and potential health issues (due to dust and other pollution from works) for an unreasonable extended period. This will be exacerbated by the fact that access to all areas of the site will be along Hill Farm Road only. What hours / days of operation will be enforced and what measures put in place to reduce congestion on this road.

Attached documents
Christchurch Land & Estates (Halesworth) Limited - Richard Brown Planning Limited (Richard Brown)

Section Strategy for Halesworth and Holton

Comment ID 1419

Comment Halesworth & Holton

Section 4 of the draft plan sets out the Council’s strategy for Halesworth and Holton during the plan period. This includes a drive towards growing the town, and attracting "younger, working age, people to the town and provide more balance to the demographics of the population." As part of this growth 440 dwellings are to be delivered during the plan period in Halesworth & Holton.

Infrastructure investment and improvements are also proposed in the plan, including sports, recreational, health and education facilities. There are currently 5 sites allocated for development, one for employment, one mixed use (inc. residential) and three for residential development.

It should be noted within Section 4 of the plan that the allocated sites and level of growth for Halesworth and Holton represent the minimum required level of growth for the settlement and should not be seen as a finite target.

Attached documents
On balance the proposals for Halesworth and Holton seem in keeping with the status of the 2 settlements but the proposals should be more specific in certain elements. The affordable housing element should be heavily weighted towards shared equity rather than rented for the following reasons: Halesworth benefits from high house values making it nearly impossible for younger people to stay in the town which has led to the trend of this demographic moving to nearby areas such as Beccles, the potential earnings in the town are of a low level which contributes to this also. The Shared equity element would provide for a more sustainable population rather than introducing an increased population that is dependent on help from others. The Infrastructure in the town is reasonable but seriously lacking in the supermarket region as one is not sufficient to accommodate a population of this size, more weight should be given to this sector when considering commercial opportunities. New parks should be planned carefully as there is already an abundance of small equipped play areas that have become derelict and areas for anti-social behaviour, in my experience a larger well equipped area with secondary benefits such as commercial opportunities (cafe/toilets/indoor play) would help create a community area that can be enjoyed by the wider community, not just the localised new development. I make comments on the following site allocations WLP4.1 and WLP4.2.

In conclusion i appreciate several of my points are detailed and can be addressed at the various stages of planning but from past experience (working for a housing developer) if these are not considered at the masterplan stage, the masterplan becomes undeliverable and therefore the principles set out within the strategy can not be adhered to and the local community suffer as a consequence as the viability of the sites becomes questionable with the need for housing overtaking the needs for the existing community. I am completely behind proposed development within the town as i realise the funding through section 106 money or CIL allows for improvements and additions to be made to the area. Halesworth has a
great deal of positives but the needs of the young families and people who have lived there for a long period have been ignored for far too long and the lack of facilities is bordering on comical when compared to a market town of similar size such as Beccles. It would be fitting to see additional money from the district put towards the lack of sporting facilities within the town as it rarely feels like Halesworth is part of Waveney when we see so much money being spent regenerating areas in Lowestoft with us expected to travel distances to find suitable facilities, this is hardly sustainable!!

Kind regards,

Craig Lockwood

Attached documents
Cutlers Hill Surgery Annette Abbott

Section

Strategy for Halesworth and Holton

Comment ID

1217

Comment

Response to Waveney Local Plan Strategic Planning consultation by Dr Annette Abbott on behalf of the Partners of Cutlers Hill Surgery Halesworth.

New homes in Holton by 2036: already 300 approved. Further 440 proposed.

We have concern that existing infrastructure is insufficient in Halesworth if these proposals are agreed. Halesworth is a market town in a very rural area of Suffolk, with difficult transport problems and a significant distance from any DGH (2 hours by public transport, 1 hour by private car). In this plan Halesworth is likely to see a population increase estimated in the order of 2500 people over the next few years (a 50% increase in the population).

The surgery has been unable recently to recruit new doctors to maintain the appropriate doctor patient ratio with a current weighted list size of 12500. We have a very elderly patient list, with 32% of our registered population over 65 years old. The prospect of possible additional 2500 people living in Halesworth means it will be essential to recruit more doctors and practice nurses (both very difficult to recruit at this time).

Unless there are significant increase in funding for General Practice and primary and community care services, the difficulties of recruitment of GPs and Practice nurses will continue to worsen and threaten the viability of the existing surgery and will restrict the care that is offered. GP workload has grown hugely, both in volume and complexity. A recent Kings Fund study showed a 15 per cent overall increase in contacts: a 13 per cent increase in face-to-face consultations and a 63 per cent increase in telephone contacts. GP numbers have not kept pace with groups of patients most likely to use primary care (over 65s and over 85s). We are very worried that we will have difficulty coping with a significantly increased population in Halesworth. An extension to the existing Cutlers Hill Surgery building to accommodate more staff and patients will be essential and needs to be fully funded.

Access to the surgery from Bungay Road is quite restricted and while the right of way across the Patrick Stead Hospital site is not in question, the
Responses to Waveney Local Plan First Draft | Consultation period 28 July to 22 September 2017

future of Patrick Stead Hospital building is also of great concern to the surgery.

We currently have no access to community in-patient hospital beds for our patients, as the 14 beds in Patrick Stead Hospital were closed in 2016. The outreach outpatients from the District General Hospitals (recently James Paget, in the past also from Ipswich Hospital) which took place for the last 60 years was stopped in March 2017. There is no support for avoiding inappropriate admissions to hospital in this locality. The district nurse provision for domiciliary nursing care is stretched so much that the care they now offer is much restricted and there is no longer a flexible team approach between the GPs and the district nurses because of bureaucracy imposed by the community provider. The Rayner Green Resource Centre which supports disabled patients and their carers has been closed to new admissions for over 15 months while the CCG reviews the service. This has also worsened and diminished the care of of very needful patients in our town and local villages. Loss of the Rayner Green service would be a disaster for local people. Our volunteer charities including in particular the Halesworth Volunteer Centre and the Dementia Carers fund are under considerable strain because of the current situation. Enabling patients to be cared for at the end of life in patient's own home or close to home is now proving very difficult. There is a significant shortage of people ready to work as carers in Halesworth and surrounding villages. If people have care needs and wish to stay in their own home, it is now often proving impossible to meet these needs with no resource, no manpower and nowhere to find this support. This means that our doctors have no alternative but to admit patients to hospital – a long way from their families and friends, and with poor chance of return to home as it is impossible to facilitate their discharge to local care either at home or in a care or nursing home locally. Many patients are dying in our district hospitals who should never have been taken there in the first place. Unsurprisingly patients are occupying acute hospital beds for prolonged periods inappropriately and their care is not tailored to their needs and wishes but is a (questionable)place of safety as there is nowhere else for them to be.

The likely availability of affordable housing in the proposal, for young and local people needs to be ensured. As the property prices in Halesworth are significantly higher than Beccles and Bungay we are likely to attract a significant proportion of elderly rather than young people from elsewhere to move into the proposed housing developments. Affordable homes for young people wishing to remain and work in Halesworth is absolutely
essential. Priority for affordable homes must be for local people.

We welcome the proposed care home and assisted living apartments and bungalows on part of the Middle school site, but would want to see local people having priority access to those dwellings. We recognise that this care home (68 beds) may be a significant workload for the surgery. We hope that the CCG will commit to NHS commissioning in the order of 14 beds in this care home for NHS care which will be local to home and is desperately needed to replace those lost in Patrick Stead Hospital. In addition, the proposed "community health care hub" co-located with the care home to replace the infrastructure we are losing with the closure of Patrick Stead Hospital is to be welcomed. We hope that NHS funding for all the services proposed will follow.

We welcome the increased sports and healthy living and education proposals for the Skills Centre and Halesworth Campus. We trust that there will be sufficient funding to enable these proposals to go ahead.

We are concerned that the Edgar Sewter site may be too confined to be able to enlarge to take an anticipated 110 more children but welcome the funding for this.

There must be funding for transport – both local community transport and transport to and from the district general hospitals. Halesworth people are very dependent on the Volunteer Car service for transport to hospital as all NHS funding has been withdrawn for any persons who are able to get into a normal car. Without sufficient support of the Volunteer centre we will have a serious transport crisis. The cost to patients to get to and from the district general hospitals by taxi is very great and this makes access to secondary care, for our patients and their families, much more difficult.

We welcome more cycle route and public rights of way access and opportunities for exercise and healthy lifestyle choices in our community. The town plan should be designed around minimising use of cars, in order to reduce the carbon footprint of the residents and reduce pollution and increasing daily exercise. All new the housing should have solar panels for electricity generation to minimise air pollution. The design of the open spaces in the new developments should meet environmental and wildlife conservation needs, which will make Halesworth remain a desirable and pleasant and healthy community to live in. While there seems to be emphasis on the retention of mature screening and hedging limiting the effect of the developments on the landscape what guarantees of conservation of those hedges and wildlife areas can be written into this
plan? Ecological considerations must be given full recognition and not ignored in any development plans in order to protect not only the environment but the health of our population.

Attached documents
Edward Barnaby Milburn

**Section**
Strategy for Halesworth and Holton

**Comment ID**
682

**Comment**
Commentary on the First Draft Local Plan Section 4 'Strategy for Halesworth and Holton'

Understandably the WLP is focussed on the many problems that beset Lowestoft but it does need to give proper consideration to the future quality and potential of the whole Plan area and the market towns as well as protecting the countryside.

The First Draft of the Local Plan seems to be an opportunistic allocation of development to readily available, and 'offered' land rather than a clear strategy for provision of 'housing of the right type and tenure' called for in the introductory Vision. Halesworth needs consolidation - not expansion - and there are many opportunities for this where infill residential development will better sustain the economy of the town and suit the prevalent requirement for smaller households that are not reliant on car use.

Halesworth is particularly afflicted by the surface storage of out-of-use cars - the three large car dealerships occupy a significant proportion of the centre of the town but are of small employment value and offer little benefit to commercial vitality. Furthermore the hazardous obstruction caused by the frequent unloading of transporter vehicles on the street is a nuisance and highly disruptive. The car dealerships should be actively encouraged to relocate to more suitable peripheral employment sites to allow for car-free residential redevelopment in the town centre - it is probable that the economic benefits to the owners would be persuasive.

This situation is exacerbated by the extensive Police building and surface parking area adjacent to two of the car dealerships with the result that a large sector of the town centre adjacent to the railway station is taken up by a sea of motionless motor cars.

One of the car dealership sites contains a very large and particularly fine
maltings building, which is largely unused and neglected; this is a conspicuous feature in the history and character of the town - and in the setting of nearby Listed Buildings - and should be protected from further deterioration. There is obvious potential for adaptation to residential use which would result in a significant number of town centre apartments immediately adjacent to the railway station.

The comments below relate to Section 4 'Strategy for Halesworth and Holton'.

The numbering of these paragraphs and that of the Local Plan Policies in the draft document is confusing.

4.1

To attract younger, working age, people - especially families - and 'restore balance', it will be necessary to reinstate secondary education in the town.

The WLP does not anticipate restoration of secondary education to Halesworth in the plan period which would be disastrous for the future balance of the community and a serious dis-incentive to younger working age families coming to set up home in the town - as is anticipated in the 'Vision' and section 4.1 of the 'Strategy'.

if, in the Plan Period, Halesworth and the surrounding villages will grow to a population approaching 20,000, reliance on bussing secondary school children to Bungay is unrealistic and unsustainable. Substituting practical skills training and apprenticeship for secondary education would put Halesworth at a serious disadvantage, as would undue emphasis on geriatric healthcare.

4.2

The protection of the individual identities of Halesworth and Holton is already compromised by the grant of outline planning consent for 160 homes behind Hill Farm and will be put under further pressure by further encroachment to the north-east of Town Farm.

While I have yet to see any detail of the proposals being prepared by Richborough Estates, I am quite in accord with the 'Halesworth Healthy Neighbourhood' site development strategy and the exchange of land to allow development of the field to the west of Town Farm House for open playing-field use. Also I have no strong objection to sympathetic low density residential development of the land to the north of Town Farm.
as long as vehicle access is confined to Harrison's Lane.

The allocation of 215 homes is far too many for this site which is a mile away from the town centre and forms part of the Strategic Gap intended to maintain the separate identities of Halesworth and Holton.

4.3

The allocation of 740 additional homes (including the 160 behind Hill Farm) is not specific as to size or type - the Plan should acknowledge, and provide for, the growing requirement for smaller homes where an independent lifestyle can be enjoyed without dependance on car use. Given the number of available and potential sites nearer the town centre, it does seem unwise and unnecessary to propose that half this allocation is provided more than a mile from the town centre.

Starter Homes for young first time buyers, and smaller units for those seeking to down-size, should be provided on sites within walking distance from the town centre to reduce car dependence and use.

The Plan should provide guidance for developers on the provision of affordable homes to meet local needs.

Attached documents
G H Thomas

Section Strategy for Halesworth and Holton

Comment ID 4

Comment I agree that the area is in need of residential property that is affordable and suitable for younger people, also the need for retirement areas. There is also the need for job creation, which to a small degree is helped with the proposals. However, most needed is a much stronger public transport infrastructure, with more frequent buses, seven days and evenings a week including villages on the periphery as well as places such as Southwold and Lowestoft. (There are many more). Only then can the community become inclusive with other towns. This is a country and farming area, therefore residents are often in more remote areas that would benefit with better transport links.

There is also a great need to increase the type of retail outlets and also help is needed for the existing shops and business' to thrive and grow. I would like to see both Waveney and Suffolk County councils do more to attract business into the area.

Better sewerage and drainage facilities need to be implemented along with better telecommunications infrastructure and underground electrical supplies. More run off areas for increased flooding problems due over the next thirty years.

Health services need to be increased to enable a structured flow of new residents able to access doctors and other health professionals.

Until all of the above is taken into consideration alongside the building of new homes in a much more robust fashion - the town will fail to thrive without them being implemented along with new dwellings.

Attached documents
Halesworth Town Council N Rees

Section  Strategy for Halesworth and Holton

Comment ID  1346

Comment  In principal, Halesworth Town Council (HTC) is not against the proposed developments listed in the new Local Plan, (LP), but is very concerned about the consequences of these developments on Halesworth's current physical infrastructure and the provision of educational, medical, leisure and recreational facilities and services.

If the main objective of the LP for Halesworth is to "help attract younger, working age, people to the town and provide more balance to the demography of the population" then there should be a lot more emphasis on creating the conditions to attract them. This aspect is missing from the plan.

Only a limited expansion of the industrial zone is planned. Job opportunities in Halesworth are very limited so that the vast majority of residents in employment have to drive outside the town for their jobs. The proposed provision of new industrial sites in Halesworth is a lot less than what is proposed in neighbouring market towns. More land and resources need to be allocated to significantly improve employment possibilities in Halesworth and so attract younger persons to the town.

There are no plans for a secondary school. Without a secondary school in the town, why should young families with teenage children choose Halesworth over other market towns with one? Why should parents subject their children to being bussed to school when expansion in other towns means that there are more attractive alternatives to which to relocate?

Waveney District Council's (WDC) LP strategy has designated Halesworth as the second biggest market town in Waveney. The planned expansion in housing will increase the population by between 25-30% increases in population in the neighbouring towns with secondary schools will put serious pressures on their secondary schools which are already at or close to full capacity. Since the LP strategy is to "provide more balance to the demography of the population", the provision of a secondary school is
essential to meet this objective.

The house building trajectory for the sites allocated in the LP will result in a peak of 661 houses being built between 2020 and 2025. This intense building activity will put heavy pressures on Halesworth's infrastructure and resources. Delays in construction will inevitably occur due to the planning process but building should be phased over a longer period to enable the infrastructure, medical, educational, sport and leisure providers to adapt to the expected big increase in demand for their services.

Although developments over 10 dwellings should have 35% "affordable housing", these house prices and rents will still be beyond the reach of most local young residents and anyway, it is far too easy for a determined developer to avoid this responsibility. Other forms of housing supply such as that provided by Housing Associations or Council Led Housing must be included in the plan for Halesworth, if the demographic imbalance is to be corrected.

Currently, Halesworth does not have a Community Centre. The provision of a Community Centre is of high priority and must be included in the LP. It needs to be centrally located in the town so as to be easily accessible and it can provide a convenient modern efficient building housing the Town Council, voluntary bodies, meeting and function rooms.

The objective of Policy WLP4.1 Halesworth/Holton Healthy Neighbourhood is to build 215 new homes plus a retirement village and a privately owned care home. What is the rationale behind the latter two, in relation to the objective of providing "more balance to the demography of the population"?

There is concern that the provision of outdoor sports facilities as part of this development has not been considered in the context of existing provision. The current sport facilities provider in Halesworth, Halesworth Playing Fields Association (HPFA), has not been consulted, yet reference to this organisation's "vision" is referred to in the context of Halesworth Campus Limited (HCL) and Halesworth Health's (HH) plans. This issue needs to be reconsidered so as to make the best use of available resources and to ensure a balance in the type and level of provision in the town. HPFA must be a party to any discussions concerning policy WLP4.1 if its objectives are to be achieved.

The Strategic Gap between Halesworth and Holton was incorporated in the previous LP. It maintained a separation of the two settlements enabling both to develop their separate identities. Outline planning permission has
been granted to Hopkins Homes to build in the Strategic Gap without any consultation process with the residents of the two parishes. The rationale for this change in strategy by WDC needs to be explained.

HTC has serious concerns about the impact of what will be hundreds of additional cars on Halesworth's roads and the surrounding areas. It believes there will be significant traffic management and environmental impacts although it has been reported that SCC does not consider this increase to be a problem. Local experience would confirm that this is not the case.

In addition, parking facilities will be stretched beyond existing capacity, exacerbated by the lack of on-road parking in the town. Many of the road junctions giving access to these new developments and junctions with the nearby main roads must be adapted to take this significant increase in traffic so as to ensure the safety of road users and pedestrians.

Due to its topography, Halesworth already runs the risk of flooding after heavy rainfall and due to the effects of climate change; these risks seem to be increasing. Therefore the disposal of surface water runoff must be taken very seriously when assessing planning applications for any of the allocated sites, all of which have their own surface water run-off and drainage problems.

Halesworth has benefited hugely from the activities of the volunteer group Halesworth in Bloom. Their activities have greatly improved the appearance and visual attractiveness of the town. Every effort should be made to encourage developers to creatively plan soft and hard landscaping to enhance the visual appearance of their developments.

The proposed development of the Dairy Farm site has been omitted from the LP.

Comment updated 14/11/2017 by Waveney District Council at request of Halesworth Town Council.

Attached documents
Heather Powell

Section
Strategy for Halesworth and Holton

Comment ID
280

Comment
I would have thought the sites for which outline permission has been given are sufficient for the present.

Attached documents
Hopkins Homes Christopher Smith  
Armstrong Rigg Planning (Geoff Armstrong)

Section  
Strategy for Halesworth and Holton

Comment ID  
1464

Comment  
Strategy for Halesworth and Holton - Object

The First Draft Plan identifies Halesworth as a market town with good transport links, provision of employment facilities, shops and other services and facilities. It states that the strategy for Halesworth and Holton is to increase the level of housing within the town which will help deliver enhanced health and sports facilities and new employment opportunities. This will help attract younger, working age, people to the town and provide more balance to the demographics of the population. The increased levels of development will help support the town centre and enhance its role as a service centre for Holton and other nearby villages. It is clear from the above that Halesworth is considered one of the most sustainable settlements in the district for meeting required levels of growth.

We agree that Halesworth is one of the most sustainable locations in the district to accommodate additional housing growth and we therefore support the Council’s approach towards development in Halesworth in principle. However, in the context of the above discussion regarding the overly optimistic levels of development proposed in Lowestoft and the unsustainable levels of growth planned for the Rural Areas, it is clear that more development will need to be allocated to the Market Towns than is currently the case. Having reviewed the options available for growth in Halesworth and the level of service provision in the town, we consider that the town could sustainably accommodate several hundred more homes than are currently allocated. On this basis we wish to promote Hopkins Homes’ site at Land West of Norwich Road (Site No. 122) which we consider to be a uniquely sustainable location for residential development in the town.
Attached documents
Irene Thomas

Section  Strategy for Halesworth and Holton

Comment ID  290

Comment  We hear of nothing relating to Halesworth in the 'In Touch' magazine. We do not exist.

Even the lone County Councillor who attends the Town Council meetings never gives us a report on what has been done to support Halesworth. We don't exist.

Attached documents
Irene Thomas

Section  Strategy for Halesworth and Holton

Comment ID  289

Comment  Where are the jobs here to support the home owners / renters? Only 2nd homes can afford to manage without some support.

Of the money given by developers only a fraction comes directly to Halesworth, the rest goes into the Waveney pool and the money we need doesn't come back to Halesworth.

It appears that you want to fulfil the obligation of house building quotas by imposing them on Halesworth without further concern on the pressures on the town.

Attached documents
Janet Watts

Section
Strategy for Halesworth and Holton

Comment ID
1093

Comment
I oppose this plan. There was extensive consultation in the past couple of years about a different and much better plan which has disappeared into the dust.

This plan proposes limited sports facilities with caveats about the financing of them which are extremely worrying. Halesworth desperately needs much better sports facilities - not just football - and it essential that they are not sacrificed at some point during the implementation of this plan.

There secondary school in Halesworth was closed not very long ago. So was Patrick Stead Hospital. The GP surgery is under overwhelming pressure. We live in one of the places in England that is furthest from A&E despite the fact we have a very elderly population. The local primary schools are overfull. There is one not very good supermarket.

These plans propose an extraordinary amount of new housing. While the UK is experiencing significant population pressure, rural north Suffolk has one of the lowest growth rates nationally. We do not need lots of over-priced new housing when the amenities we have in the town are already overstretched.

We need low priced rental accommodation for people on below average salaries.

Attached documents
Jean Berry

Section: Strategy for Halesworth and Holton

Comment ID: 85

Comment: Has consideration been made for extra parking for Halesworth Town Centre to cater for the extra residents because where the extra housing is planned for, I doubt it many people would walk into town.

Regarding the Housing for Chediston Street/Saxon Way - the access road to these proposed houses needs to be upgraded to take the extra traffic.

Halesworth town planning, to date, has made the town very attractive with a mix of housing designs - I would be very concerned about huge estates being built on the outskirts of town taking away from the town.

Glad to see some social housing being built - could the majority of these be offered to local people in need rather than incomers?

Attached documents
Joanna Barfield

Section  Strategy for Halesworth and Holton

Comment ID  306

Comment  Better to go for small projects where areas of the town can be filled in sympathetically.

Attached documents
Judith Condon

Section  Strategy for Halesworth and Holton

Comment ID  299

Comment  We definitely need more good employment opportunities, and affordable housing for young families, together with the education and leisure and sport facilities they need.

Attached documents
Liz Calder and Louis Baum

Section | Strategy for Halesworth and Holton

Comment ID | 702

Comment | Waveney Local Plan
Strategy for Halesworth and Holton

Comments from

Liz Calder and Louis Baum

19th September 2017

Strategy

The strategy to increase the level of housing is a good one, but we note the explicit intention that this should be "within the town" (4.1). We would suggest that this would be better achieved by building at least some of the new housing in Halesworth town centre itself rather than in fields nearby. This would reduce the impact of increased car use and reduce pollution, and would also better help achieve the stated purpose to "support the town centre and enhance its role as a service centre for Holton and other nearby villages".

There are several sites "within the town" that lend themselves to such residential development. For example, relocation of the Volvo garage on Quay Street to the outskirts of the town would make available room for residential development on the garage site as well as in the old maltings building within it, all within easy walking distance of the town centre and the railway station. There are other such sites "within the town".

We note with approval the intention (4.2) in the Local Plan "to protect the individual identities of Halesworth and Holton". But this intention would also be better achieved if some of the planned housing were to happen close to Halesworth town centre rather than in fields outside the town. We appreciate that not all of the 440 new homes allocated in the Plan could be accommodated in this way, but fewer homes outside the town centre
would be desirable and, surely, achievable.

Overall, it does seem that the plans envisage the building of far too many houses on sites too far from the town centre, forcing new residents to rely on cars rather than being able to walk into the centre.

Attached documents
Maggie Larbey

Section  Strategy for Halesworth and Holton

Comment ID  115

Comment  Future housing in our community needs to be:

1. suitable for local people, i.e. affordable homes, not 3+ bedroom executive houses (of which there are more than sufficient);

2. built on brown field sites, not on good farm land which can grow food or graze animals;

3. based on the local jobs available - in order to stop even more vehicles commuting on narrow local lanes to towns like Norwich.

Help reduce the area's carbon footprint by keeping it local.

Attached documents
Malcolm Smith

Section: Strategy for Halesworth and Holton

Comment ID: 1035

Comment:

I believe that the infrastructure in Halesworth and Holton is completely inadequate for the number of properties proposed. Whilst there are some plans for minimally increased infrastructure, these will, in no way, cope with the seriously increased population.

The proposals would involve a huge percentage increase in population in a small town like Halesworth, far in excess of what would normally be considered an acceptable increase.

Halesworth is situated about 25 miles from any hospital/A&E. Surely it does not therefore make any planning sense at all to create such an increase in population in such an area.

Harrisons Lane is quite unsuited to the increased usage which it will see. The junctions between Harrisons Lane and both Norwich Road and Bungay Road, Holton will be completely inadequate. Traffic heading north along Norwich Road and turning right into Harrisons Lane will cause such a tailback on Norwich Road as to be totally impractical.

National Cycle Route 1 travels along Harrisons Lane and should not, under any circumstances, be compromised.

The local plan includes a mishmash of sports provision, as far as both location and operators are concerned. Surely this is the time for the local organisations to be required to work together, in the interests of the people of Halesworth.

I believe that the large area of the ex middle school playing field which is being proposed as ‘care facility and retirement community’ is subject to C2 classification. How will this be complied with and who will ensure that it does comply?
Attached documents
Mr & Mrs D Foster

Section  Strategy for Halesworth and Holton

Comment ID  283

Comment  Hill Farm Road

There must be consideration given regarding the road junction at Hill Farm Road / Holton Road. Holton Road is a very busy road, especially in the summer and peak times.

Attached documents
Mrs S Orton

Section Strategy for Halesworth and Holton

Comment ID 293

Comment 740 houses is far too many for Halesworth approx 1,500 residents + children. Services would have to be upgraded before large estates were built. It makes sense to use the smaller proposed sites. Sparrowhawk Road off sites 13, 76 and 102 would not interfere so much with other housing as it is a little used road and would have better access. There is no high paid employment in Halesworth residents would have to work in either Norwich or Ipswich. The train service is not adequate. Where would people shop? The Edgar Sewter school has already been extended after the middle school closed. Saxon Way would not be suitable for the extra traffic.

Attached documents
Mrs S Orton

Section Strategy for Halesworth and Holton

Comment ID 640

Comment As you can see from my address I have a vested interest in the decision WDC will take over the proposed development in Halesworth. Like many of the people who live here I moved here fourteen years ago because of the towns sense of community which if 740 houses are built will be in jeopardy. I went to the meeting at the Edgar Sewter last night and we were given a well informed account of the draft plans but there is so much that has not been considered. Firstly the number of homes is far to many for such a small town and I feel any one development shouldn't contain more than about 100 houses. You say you wish to attract younger people but the reason there are more older people in Halesworth is because of lack of well paid employment in the area. Most new residents would have to work away and would not support the town as you suggest. Even now it is older residents who mostly use the town centre as young people want budget stores and cannot afford the higher prices of the small shops with higher overheads. You have only to look at Saxmundham where a great deal of development is going on to see that the town centre is abysmal except for the Tesco and Waitrose. We were told at the meeting that an extension of the school would be down to Suffolk District Council. Bearing in mind the school has already been extended to take in middle school pupils this would mean using precious play areas and who would want to raise a family when the education of your child is dependant on one small school with inadequate parking and no local secondary school. The only supermarket would struggle as would the car park which is full to bursting point many days as it is used by outlying villages. Has the area next to the coop been included in your proposals as I believe Badger homes has bought it and would build fifty homes.

I know these plans have further investigations to go through but I hope due consideration will be taken to the many factors involved in preserving this unique little town. In the entrance to the Angel Hotel is an old newspaper cutting describing without naming it a town called Content, that town is Halesworth. Perhaps this is of no importance in the world today and I know
councils are under pressure to build but I hope what I have told you will help.

Attached documents
Brown

Section Strategy for Halesworth and Holton

Comment ID 44

Comment I am sure in an ideal world that this would be good for the local economy but we do not live in an ideal world. How will you ensure these new houses will be allocated to young people? Most new incomers in Halesworth are retired from other areas of the country looking to buy a cheaper property and live off their extra equity. If all the new housing is bought by this type of person the situation will not improve. Young people are priced out of our housing market by that type of person and people buying housing to rent. The infrastructure of Halesworth will be unable to sustain this amount of new housing. We have one supermarket which is in effect is a convenience store. We were refused a Tesco. Our doctors surgery is already stretched to its limits and the hospital has been closed when I believe promises were made to keep it open for local people when the doctors surgery was moved from the Market place to Cutlers Hill. If these houses are built we are in danger of becoming a glorified retirement village and will destroy valuable farmland and beautiful countryside. I am totally opposed to these schemes.

Attached documents
Pat Bew

Section  Strategy for Halesworth and Holton

Comment ID  292

Comment  Where are these people supposed to be working?
You can't pay a mortgage or rent here on the minimum wage or benefits.

Attached documents
Rascha Zurakowski

Section  Strategy for Halesworth and Holton

Comment ID  686

Comment  I am broadly in favour of the proposed developments but am concerned about the size of them and the impact they will have on the infrastructure of Halesworth.

Attached documents
Richborough Estates Ltd  Russell Crow  
Brown & Co (Paul Clarke)

**Section**  
Strategy for Halesworth and Holton

**Comment ID**  
1326

**Comment**  
We recognise and support the role that Halesworth and neighbouring Holton will play in delivering the aspirations of the emerging Local Plan. The Draft Plan allocates land for 440 new homes in Halesworth, which is in addition to the 300 dwellings that already have planning permission or have been completed since the beginning of the Plan period. Halesworth has extensive facilities to support further growth beyond the level identified in the emerging Local Plan. The settlement benefits from a range of facilities and has good rail and road transport links to the wider area. This includes a regular train service to Ipswich and Lowestoft.

**Attached documents**
S Coventry

Section Strategy for Halesworth and Holton

Comment ID 302

Comment Whilst it is obviously essential for new housing locally and nationwide, there are some very obvious points I would like to make:

There is not a large amount of local employment for new families, thus, cars would be essential: more traffic on roads.

Local businesses would benefit of course, but there are not the shops and businesses and facilities that would appeal to families moving here.

Are there empty houses which could be renovated? More costly and less profit for large building companies, but ethically sound.

Small properties required to keep local people in area. Too many will otherwise become holiday homes.

Attached documents
Seph Pochin

Section  Strategy for Halesworth and Holton

Comment ID  129

Comment  An awful lot of housing planned but no mention of adding to the shopping facilities in Halesworth. Interested to see the Transport Plan given the dirth of public transport availability in Halesworth. Trains to Ipswich need to be twice an hour, particularly at peak times and a bus service to Ipswich would be a big help too

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section | Strategy for Halesworth and Holton

Comment ID | 1134

Comment | Halesworth & Blyth Valley Partnership Trustees have taken the opportunity to review the Waveney Local Plan – First Draft Plan July 2017 and wish to offer the following comments and observations:

Halesworth is surrounded by open countryside with the prominent landscape feature being the Blyth River Valley. It is a very individual Market Town with a prominence of independent shops and traders.

However over the last few years it has been seriously affected by a lack of investment from the upper tiers of government, National, County and District level.

Underinvestment in our infrastructure, lack of support to increase our economic viability through limited job opportunities and employment creation have resulted in an imbalance of population age.

Because of our location, close to Southwold, Aldeburgh and areas of outstanding local beauty, housing costs, higher than in many other small Market Towns, contributes toward a retirement area and an increased elderly population to the detriment of young families and the loss of our Middle School and Swimming Pool for example have given rise to the feeling of neglect.

We are pleased that the option to create a new settlement has been abandoned as this would undermine the present Market Towns in the Waveney area. Any new settlement would have been to the detriment of the Market Towns and rural areas and dilute their importance in community life.

We welcome an increase in affordable housing and industrial allocation to help to redress some of these problems.

However with housing and industrial development must come improved infrastructure, access to local senior schools, better integrated sports
provision and health and welfare care.

When wealth creators look to relocate or move into an area they look at available land for industry; housing; schools close to their location with good access; sport/leisure facilities and hospital and health care support. Halesworth is the furthest market town in England from any major hospital, (the closure of Patrick Stead Hospital has made matters worse); has only primary education with no senior school.

This should be considered when allocations are made and investment given to support growth.

We thank you for the opportunity to have an input into this consultation document and hope that you will give serious consideration to the matters raised to enable Halesworth to continue to expand in a balanced way and to prevent Halesworth from becoming a retirement town.

Attached documents
The Morton Partnership Ltd Ian Miller

Section Strategy for Halesworth and Holton

Comment ID 963

Comment As a local Company working from our office within the Waveney area, in the construction sector and employing some 35 staff in the Company, we feel that we need to provide comment on the recently released Local Plan for Consultation.

I have taken the opportunity to attend the Consultation event held in Halesworth on 10 August 2017, where it seemed clear that the volume of properties/sites being proposed within the immediate area appeared significant, and will have an impact on the services/infrastructure within the town which currently are stretched, to say the least.

Attached documents
Therese Coffey

Section Strategy for Halesworth and Holton

Comment ID 1284

Comment I am conscious of what is in effect enabling development in Halesworth to support the campus and the new retirement community with health facilities. It is important that such land and the neighbourhood receives special designation in the future, perhaps as an asset of community value.

I am aware of the concerns in the community regarding the significant increase in housing without any plans, apart from the campus, for increased facilities.

There is a real lack of community facilities in the town, which I hope the campus will help fulfil. Waveney District Council needs to be clearer in how it will support the community wellbeing. The Rifle Hall and other community buildings have been neglected by WDC. Even though the Rifle Hall is in new hands, after transfer by WDC, this is not functioning as expected and there is a huge gap in the provision of a community hall.

Attached documents
Watts

Section  Strategy for Halesworth and Holton

Comment ID  248

Comment  While I am in favour of the proposed Halesworth Campus development, I am concerned about the flood risk if 215 houses are included as part of the development.

The current school playing field and Dairy Hill playing field are two of the highest points in Halesworth and Holton. They currently both soak up a lot of rainwater, which is then released slowly. If they both end up underneath concrete and tarmac, where will the rainwater be forced to go - yes, downhill towards Holton village and Halesworth town centre, both of which currently have flooding events on a regular basis.

What measures will be taken to avoid the extra risk of flooding and who will end up paying for this?

Attached documents
Infrastructure in Halesworth and Holton

Anonymous

Section Infrastructure in Halesworth and Holton

Comment ID 267

Comment My concerns are the infrastructure is not in place to currently accommodate the new homes. I strongly feel that the infrastructure needs to be in place before the new homes, 400 of them, are built.

Building up high on WLP4.2 land would also result in additional strain on the local water table – potentially adding to the yearly issue of flooding in the town.

Attached documents
Anonymous

Section Infrastructure in Halesworth and Holton

Comment ID 269

Comment Without infrastructure these plans are disastrous – we need better roads, more school places, more doctors and better sewage.

Attached documents
Barbara Langley

Section  Infrastructure in Halesworth and Holton

Comment ID  279

Comment  Are there enough places in Edgar Sewter Primary School?

Halesworth Thoroughfare was underwater in the middle of the day on Tuesday 8 August. Will this new build add to the flooding problems by creating yet more impermeable surfaces?
Beccles and Bungay Cycle Strategy Ian Reid

Section

Infrastructure in Halesworth and Holton

Comment ID

1021

Comment

Welcome inclusion of:

* Improvements to the cycle network as identified in the Waveney Cycle Strategy

Attached documents
Charlotte Slater

Section  Infrastructure in Halesworth and Holton

Comment ID  620

Comment  * My other concerns focus on the town’s infrastructure. The Doctors are incredibly stretched and need more GP’s to serve the community, I note from the plan an extension to the local GP practice is proposed which I completely agree with. The local school is an old building and would need significant extension to cope with a rise to town population numbers. So the extension of the school I also agree with. This is a matter of significant importance if young families are being encouraged to the town, to re-address the strong elderly bias to the town. The families living here now are currently battling to get good sports facilities without success or help. This will require significant funding to establish now...before 400 homes get built! This would also generate more jobs for both the current and potential new population.

* I also think it is important to think about the timing of the building of the proposed new developments. For example I believe building on the proposed WLP4.1 plot should be first to go up, as it is the site with key improvements to the towns infrastructure and 215 new homes. Allow this to be built, established and for the town to accommodate the new population, before starting on the next phase of building homes. This is after all a 20 year plan.

* I did not see anything in the local plan for Halesworth and Holton about supermarkets. If the town and surrounding villages populations are going to increase significantly we must include provision for a new, larger supermarket to support the town. I am aware of historical opposition to this, but young families struggling to make ends meet simply cannot pay the CO-OP prices for a weekly shop. We need to attract a market leader to be competitive with the costs for food, on land designated within your plan, for a supermarket in our local area. Possible sites could be in or around the Holton / Halesworth border by Bernard Matthews and Spectra Packaging.
Attached documents
David and Jenny Olds

Section Infrastructure in Halesworth and Holton

Comment ID 643

Comment My wife and I have been residents of Halesworth since 2005/6 having spent 36 years involved in education in Birmingham for thirty-six years. At the outset we would like to make it clear that we very much like living here in our retirement, but although we are relatively "newcomers", we would like to make the following comments about the New Waveney District Plan.

First we would like to agree that there is an acute shortage of housing across the country and the additional housing/ increase in population proposed for Halesworth may be of benefit provided that the following provisos are considered and given consideration. These comments are not in order of priority but as we thought of them, although on reflection we think they would be the points we think are the most important in descending importance. One other point needs to be made and it concerns the proposed increase in new homes. In the plan it is proposed to build 740 additional homes in Halesworth/Holton from 2014 to 2036 but there is no mention of the proposed increase in population which we would estimate to be at least 3,500.

1) Cutlers Hill will need to be significantly expanded. Have the planners considered how difficult it is to recruit qualified doctors to train as GPs or in addition to recruit nursing and auxiliary staff? Similarly Dentistry in Halesworth at present is covered by two practises, only one of which accepts NHS patients. Are these practises going to expand or do we need an additional one?

2) In terms of education we would like make the following comments. There will be clearly a need to expand provision for the increase in the inevitable increase of the school population which we have noted in your notes on "Key improvements to the two primary schools in Halesworth and Holton. However we would like you consider the following points.

As a county Suffolk has made some improvement in the achievement league tables, from a very low base, at Key Stage 1, 2, 3, GCSE and A level
but as long it perseveres with primary schools with predominantly mixed aged classes it is unlikely to be on a par with those schools where pupils are in the same class of a similar age. Schools which do not have mixed aged pupils are able to attract teachers with specialist knowledge covering the various subjects of the primary curriculum and the teachers do not have to plan for age groups spanning two years i.e. 2014 - 2016. Lastly where are these expanding schools expected to attract these extra teachers when teacher training is on the decrease?

3) With an increase of population to approximately 9000+ are we going to have at least one PC or PCSO on duty in our now shut police station? Both of us are very much involved in supporting the Halesworth Library which as you may or may not know is now, like all the libraries in Suffolk, are charitable trusts. We and the Trustees are aware that recently the staff have had to deal with frequent unsociable behaviour by teenagers educated presumably at Bungay High School. Despite discussions with both the PA of the head teacher of Bungay High School and a police officer from Suffolk Constabulary, who it took an interminable time to be connected to, it would seem the staff have just got to put up with it, this we find unacceptable. It would appear that because the crime rate is significantly higher in Lowestoft then our Halesworth team are covering Lowestoft rather than the patch to which they were assigned. One of the team is supposedly a specialist in dealing with anti social behaviour by teenagers but I have not been able to make contact with him. What will happen when we have an increase in population of approximately 3,500?

4) What % of these proposed 740 new houses are being made available for local social housing which we thought might be of paramount importance?

5) Has any consideration been given to the extra car parking which will be inevitably be needed to accommodate the additional parking needs of the 740 families living in the town?

6) With regard to the proposed 200 new homes on land adjacent to Chediston Street, Halesworth, it is a site which does not specify a main access road. Could this be clarified? Living close to Roman Way, and knowing residents there, we are acutely aware of cars driving well above the 30mph towards the junction with the T-Junction with the London/Walpole Rd. Extra traffic will only acerbate this problem.

7) With 740 more homes by 2036 has there been any consideration to the increase in waste disposable needed? Our calculations foresee an expansion of the population of Halesworth of at least 50% what affect is
this going to have on waste collection bearing in mind that there are only two sites where people fortunate to have vehicles can take there waste for free i.e. Leiston or Lowestoft?

We realise that our list is somewhat protracted but our questions will hopefully reflect the feelings of a lot of people in Halesworth and its surrounding area.

Attached documents
Edward Barnaby Milburn

Section Infrastructure in Halesworth and Holton

Comment ID 684

Comment 4.6

Infrastructure - Transport improvements should include the provision of bus bays at the principal bus stops to improve traffic flow and reduce congestion.

Harrisons Lane is very narrow with a very tight junction with Norwich Road and a problematic intersection with poor sight-lines at Bungay Road. The Lane is now used by busses with some difficulty and risk.

Green infrastructure improvements should include restoration of overgrown ponds and the Green Lane adjoining the south-east boundary of the northern part of the WLP 4.1 site leading to Bungay Road.

Attached documents
Fern Pretty

Section
Infrastructure in Halesworth and Holton

Comment ID
344

Comment
[WLP4.4] Schools especially primary as they are both going to become extremely full in the next few years and I am concerned for my sons education if classes are schools are going to be completely overcrowded.

What about water run off as this year has shown we have had torrential rain and as I live at the bottom of the hill if houses and tarmac are there instead of trees where will be water go – probably my house & garden!

I understand the need for new houses but to propose a plot so close to homes is ridiculous and where there is not enough space in the primary schools for more children and not enough infrastructure as a whole.

1 supermarket which is expensive and nothing for children to do and then for more people to come into the town – what is everyone going to do in there spare time?

Attached documents
Halesworth Health Karen Kerridge

Section  Infrastructure in Halesworth and Holton

Comment ID  1078

Comment  HH is a small charity with trustees from the health and care professions, the voluntary sector and from the public. Its aim is to preserve and future proof health and care services in and around Halesworth.

The clear message from the local plan proposals is a large increase in population in Halesworth. The concern is that healthcare services will not cope with a 25% increase in population. It would be good to see the demography of the area improve with more young people and families, but it's vital that facilities and services match the needs of the range of age groups, particularly for healthcare and education.

We cannot agree with the Waveney Plan statement that 'the town benefits from provision of most essential services and facilities.' Currently health and care services locally have been reduced or threatened and are struggling to cope. The CCG are now addressing this situation and we look forward to positive progress.

Halesworth, with a disproportionately elderly population, is almost 30 miles from the acute hospitals, with journeys taking an hour each way by car; for those using public transport the journey involves train and bus and takes half a day. Thus local services are essential.

Patrick Stead Hospital beds have been closed prior to the planned Castlemeadow Care nursing home being built, in which the CCG have agreed there will be NHS funded beds. There is currently no admissions prevention or out of hospital service available to healthcare professions in Halesworth, meaning that it’s either a struggle to keep people at home or patients are being admitted unnecessarily to overburdened acute hospitals. Discussions are now however taking place to hopefully amend this situation in South Waveney.

Outpatient facilities have been reduced, and consultant clinics in Halesworth have currently ceased.
The excellent Rayner Green Resource (day) Centre, which cares for people often with severe disability and dementia, allowing them to live longer in their own homes, and preventing hospital admissions, is under review, with currently reduced numbers of people allowed to use it.

If the population increases to this degree Cutlers Hill Surgery will need to expand to cope. The local plan mentions an extension to the surgery, which is welcome, as long as funding is available and as long as enough doctors and nurses are working there. The main difficulty currently is finding enough GP's for Halesworth. This is likely to worsen with increasing numbers of GP's approaching retirement, and is a regional and national problem.

Castlemeadow Care's proposals are welcome and will help to achieve integrated health and care locally.

There is no nursing home in Halesworth. The new facility will, in addition to nursing and residential beds, have high level dementia care in accordance with research based evidence. There will also be, in addition to the NHS funded community beds for people who don't require acute hospital beds, NHS outpatient facilities in a 'community hub' within the facility are proposed.

Castlemeadow Care will also build and run 'accommodation with extra care' on the site in conjunction with their nursing home.

We are very supportive of the Halesworth Campus plans to develop and improve sport and leisure facilities, in conjunction with the skills centre. There are enormous benefits to both physical and mental health from this, and Halesworth's current sport and leisure facilities are very restricted. The development will encourage less obesity, especially in children; physiotherapists can extend their range of support through gym facilities; pulmonary rehabilitation, exercise aiding recovery from cancer, chair based exercise for those with disability, yoga and pilates, are other examples of potential benefit. Cycling routes locally are much needed, and essential to be in place to and from the site. In the longer term a swimming pool would be hugely beneficial for health.

Another enormous benefit will be the skills centre training. The proposed construction, and sport and leisure training will offer great opportunities for local young people. In addition it is hoped and intended that there will be healthcare training in conjunction with the new Castlemeadow Care facility. This is vital for the area now and in the future.
There will also be an increased need for volunteers, often very rewarding psychologically for people taking part.

All of this integrated healthcare will work well in conjunction with the proposed information and support centre, adjacent to Cutlers Hill Surgery, for which planning has already been granted. This will be a centre for people with life changing illness in Halesworth and surrounding towns and villages, and their carers/families, to be built and run by Halesworth Community Nursing Care Fund.

In summary it is vital that local healthcare services are restored now to their former state, which has provided excellent integrated care over the years. When the population increases it is vital that the facilities for health and education are then expanded to appropriate levels for the benefit of this rurally isolated population.

Halesworth Playing Fields Association David Thomas

Section Infrastructure in Halesworth and Holton

Comment ID 1163

Comment Under the heading "Green Infrastructure" on page 97 is "Improvements to facilities at Dairy Hill Playing Fields (part of Halesworth/Holton Healthy Neighbourhood, Policy WLP4.1) including new junior pitches, drainage works, new pavilion and additional parking" As already stated, HPFA is not part of this development.

The next bullet point under "Green Infrastructure" is "Provision of new sports facilities on the Halesworth Campus (part of Halesworth/Holton Healthy Neighbourhood, Policy WLP4.1) including a sports hall, gym, new tennis/netball courts and 3G pitch and additional grass pitches.

Dividing the provision of future outdoor sporting facilities over two organisations with competing facilities, will be wasteful of both money and resources and will only lead to confusion. The HPFA already provides facilities for junior and senior football and tennis, yet it would appear that a football pitch and tennis courts are planned for the Halesworth/Holton Healthy Neighbourhood development. It would appear that HPFA has nothing to gain from its being involved in this project and everything to lose.

The HPFA Trustees would like to remind Waveney District Council that for more than 60 years HPFA has been the sole provider of sporting facilities for Halesworth and the surrounding district. The HPFA has the experience, expertise, teams and contacts to successfully run a multi-discipline sports complex and it is already working in partnership with the Football Association and Suffolk Football Association Ltd. to improve the football facilities at the Dairy Hill site.

Attached documents
Halesworth Town Council N Rees

Section Infrastructure in Halesworth and Holton

Comment ID 1347

Comment Halesworth is a market town which provides shopping, social, leisure and sporting facilities, not only for its residents, but also for the residents of the many small villages surrounding the town. It's very commercial viability depends on being able to supply the needs of the residents of these villages since the town's population is insufficient to support the range of shops and businesses that the town enjoys.

As a consequence, it is essential for the town's future that sufficient affordable parking spaces are provided for shoppers from the surrounding villages and for Halesworth residents from the outlying suburbs. The development of approximately 700 new dwellings, all on the outskirts of Halesworth, will only exacerbate the parking situation. Please note that there is virtually no on-street parking.

The main shopping street in Halesworth, The Thoroughfare, is partially pedestrianised. It would benefit greatly from being completely pedestrianised giving Halesworth a unique centre, safe and attractive to visitors.

The commercial bus company services for Halesworth are very limited with none servicing the surrounding villages. The volunteer run Halesworth Area Community Transport, (HACT), provides an essential service mainly within the town boundaries. Its activities are restricted due to funding limitations and its dependence on volunteers. The same applies to the activities of the Halesworth Volunteer Centre with its team of volunteer car drivers. The new housing developments on the outskirts of the town would benefit from being included in the HACT routes by an injection of funds from the developers of these housing developments. Such a service would add to the appeal of that development.

Although improvement to the cycle network is listed as the first priority, and is a laudable aim, provision of affordable parking should be the top
priority for Halesworth's long term economic viability.

However, significant improvements can be made. For example, a new cycleway linking the proposed development at Hill Farm Road with the cycle track across the Millennium Green and Town Park would enable cyclists to avoid the dangerous Holton Road into Halesworth. Similarly, a new cycle track from the proposed Chediston Street development into Halesworth would avoid cyclist from this development cycling the wrong way down Chediston Street.

Provision for pedestrians has largely been ignored. Many of the pavements in Halesworth are narrow and do not meet modern requirements. New pathways into Halesworth from the new housing developments can be combined with the proposed new cycleways.

The lack of a secondary school in Halesworth will seriously hamper attempts to correct the demographic imbalance.

Provision of health care is currently a major concern to Halesworth residents. A major investment in capacity at the Cutlers Hill Surgery is needed now to meet current demands of Halesworth's aging population. Consequently, an even bigger investment will be required to satisfy the demand which will be created by an additional 1,500 residents.

Halesworth must be the only market town in East Anglia without a Community Centre. With the planned population increase of 25-30% to around 6,500, it is an essential facility around which the town can develop a coherent community. This Community Centre needs to be easily accessible for residents and so must be sited in the centre of the town. It would house HTC, community and volunteer organisations as well as providing space for events; etc.

Halesworth has a relatively new library and although any library will benefit from additional investment, (the library is supported by and active Trust), Halesworth has more pressing problems to be resolved.

Youth is poorly served in Halesworth. Apart from the Scouts and Guides, the only other organisation catering for youth is the Apollo Centre on the old Middle School site. The Youth Club's lease on the building it uses is due to expire in March 2018. However, Phase 1 of the development will not affect the current youth club building and Halesworth Campus Ltd. has confirmed that the lease will be extended over this period.

The Apollo Youth Club is a much appreciated and successful youth club,
providing a much needed opportunity for Halesworth youth to meet, socialise and enjoy a range of activities.

Considerably more than "localised improvements to the sewage network" is required. Heavy rainfall already results in the overflow of the sewerage system in several places within the town boundary.

High-speed broadband should be provided as standard at all developments.

Comment updated 14/11/2017 by Waveney District Council at request of Halesworth Town Council.

Attached documents
Harry Knox

Section     Infrastructure in Halesworth and Holton

Comment ID  332

Comment     The surface water run off will increase and make the flooding in the town and land around the millennium green. At more risk as we know from the other week when the thoroughfare and the millennium green had raw sewage flowing through.

I attach photos of the flooding (the water run down roman way and of the field across chediston street onto the flood plain into the river then into the town

Attached documents
Heather Powell

Section
Infrastructure in Halesworth and Holton

Comment ID
281

Comment
It is essential before building that the drainage has improved. My estate on Langley's Quay has just had its second flood of sewage this year!

Attached documents
Irene Thomas

Section  
Infrastructure in Halesworth and Holton

Comment ID  
288

Comment  
We keep saying over and over that until the infrastructure is in place there can be no development – but nobody listens.

Even when the Town Council turns down a planning application it is overruled – you have to meet your targets – we don't matter Holton Hill Farm Road.

Twice raw sewage has come into 4 gardens this year – what will it be like with lots of extra houses.

How can you conjure extra capacity at the surgery / doctors / nurses / school buildings out of thin air?

Attached documents
J Janes

Section                        Infrastructure in Halesworth and Holton

Comment ID                    1212

Comment
No amount of cycle and footpaths will get people out of their cars. The proposed new housing is likely to generate some 1000 minimum cars which the existing road network will not be able to cope with. There is no way to widen existing roads in town and parking is already difficult.

It is not clear where it is thought any extension to the primary schools can be sited.

Building an extension to the surgery will not mean that it can be staffed. The surgery cannot recruit GPs at the moment. This is unlikely to change quickly. The proposed new health facility will generate more work for the surgery.

There will need to be huge improvements to the sewerage network as it cannot presently cope when there is heavy rain.

Attached documents
Jan Athis

**Section**
Infrastructure in Halesworth and Holton

**Comment ID**
276

**Comment**
Recent heavy rain resulted in raw sewage spilling onto pathways. Extreme weather events likely to increase. Sewerage system clearly overwhelmed already. What is planned to improve the sewerage system in advance of housing?

**Attached documents**
Joanna Barfield

Section       Infrastructure in Halesworth and Holton

Comment ID   305

Comment       General concern about infrastructure – schools, surgery/hospital etc. What job opportunities are there? Will houses be affordable?

Attached documents
K Elliff

Section: Infrastructure in Halesworth and Holton

Comment ID: 272

Comment: Great news for Halesworth new houses new people, let's get the infrastructure to match.

Attached documents
Ken and Jan Derham

Section  Infrastructure in Halesworth and Holton

Comment ID  769

Comment  We are also concerned about the provision of health services for the residents of 740 new homes proposed for Halesworth, as the Cutlers Hill Surgery barely copes at present. We experience long delays in getting appointments and apparently they have difficulty already in recruiting necessary medical staff. We realise this is outside of the remit of Waveney District Council and is a national problem, but it is a factor that needs to be considered seriously and addressed.

Attached documents
Liz & Ken Lobacz

Section Infrastructure in Halesworth and Holton

Comment ID 626

Comment [WLP4.2] On the whole it is sad to see this field lost to housing, but we do see very much the need to provide housing for local people. But they will need jobs / leisure / doctors / schools / transport?

There is a massive flaw in this proposal as the new developments are aimed at bringing younger people into the area.

This will cause a large population increase as more children will be the outcome. There is no local senior school which will discourage these younger people from wanting to move to the area. The ratio you seem to be working to is far too small. Our experience of these developments is that there is a far higher proportion of children than you are allowing for. Catch 22. No school. No incentive to live there for young people.

Attached documents
Liz & Ken Lobacz

Section: Infrastructure in Halesworth and Holton

Comment ID: 346

Comment: Harrisons Lane have sports development. For Halesworth to grow we desperately need proper leisure facilities. I find it incredible that the size Halesworth is, we have nothing at all provided by local council. I feel very strongly that the town has inadequate infrastructure to take on a population increase of some size. The proposed site at Harrisons Lane, although providing pitches and sports hall, I feel something is being missed by not building a proper swimming pool. The proposal is for a 20m/5 lane at present – woefully inadequate. A high proportion of the population cannot use gyms / pitches – swimming pools are crucial to the wellbeing and mobility of older groups – so it’s a trip to Leiston all the time. I would very much prefer not to use any car and cycle to a pool in my hometown.

Attached documents
Liz & Ken Lobacz

Section: Infrastructure in Halesworth and Holton

Comment ID: 373

Comment: Planning permission for 740 new homes should not be approved at the moment.

Reasoning:

The idea of the proposed new developments bringing young families and new life to Halesworth is commendable. However without a substantially improved commitment from the LA in terms of future amenities and infrastructure, the concept is likely to fail.

For these large expansionist plans to succeed in Halesworth, the town would require to be in place as the developments proceed;

1/ real employment potential locally and better road and rail links to areas already providing these.

2/ an improved rail service to include direct lines to Liverpool st and Norwich.

3/ the assumption of how many children are associated with these types of development seems woefully underestimated. Where young couples are drawn to these areas the birth rate soars. Consideration needs to be given to these young and growing children's needs.

4/ pre-school and crèche facilities.

5/ a secondary school.

6/ NHS dentists (it is currently impossible to register with one).

7/ more detail on the planned surgery expansion.

8/ A&E and basic out-patients facilities.

9/ a swimming pool and children’s pool (the current leisure proposals are too narrow in there appeal).
10/ a new supermarket or expansion of existing to provide greater choice including clothing for children and adults.

Unless the above issues are addressed the scheme will fail in its objective of bringing new life to the town and could create a disaffected generation of children, with all the associated social problems.

Attached documents
Liz Calder and Louis Baum

Section Infrastructure in Halesworth and Holton

Comment ID 1537

Comment Infrastructure

We note with approval the intention (4.6) to improve transport facilities, education, health care and community facilities to provide for population increase resulting from the building of new homes. We believe funding for these improvements should be agreed well in advance of the residential building developments. We are also very concerned that the Local Plan makes no provision for the restoration of secondary education in Halesworth, and would argue that no approval for residential development be agreed until plans for secondary education are given the green light. It must be desirable for the future of Halesworth to ensure that its new housing attract younger people with families, but for this to be achieved, secondary schooling must be made available as an essential part of the housing development plans.

Attached documents
Mr & Mrs D Foster

Section            Infrastructure in Halesworth and Holton

Comment ID         284

Comment            Holton Road is a very busy road, especially in the summer and peak times. Also the lack of infrastructure in the town at present, which should be improved before more housing development.

Attached documents
P L Hyden

Section Infrastructure in Halesworth and Holton

Comment ID 271

Comment This week demonstrated that drains and sewerage system in Halesworth is not capable of dealing with current capacity. This week sewers have burst and overflowed on Bramfield Road, Millennium Green and Blyth Mews. Sewage has split into public areas and into Blyth River which is an environmental reportable event. Waveney should not grant any more planning permission until local services are upgraded. School places / nursery and doctor surgery facilities all need to be considered too.

Attached documents
Pat Bew

Section  Infrastructure in Halesworth and Holton

Comment ID  625

Comment  Get the infrastructure in first!

Building houses equates to more children of all ages – where do you suggest that they go to school and what are they to do in the evenings. We have no evening buses in Halesworth. Healthcare facilities have to be increased.

Attached documents
S Coventry

Section
Infrastructure in Halesworth and Holton

Comment ID
303

Comment
Infrastructure would more than struggle. Medical facilities are already stretched to breaking point (4 wk wait for non urgent appointment at Cutlers Hill Surgery for example). No NHS dental list available in town. Halesworth is 25 miles from main A&E hospital, plus no ambulance station. Schools would have to be dramatically extended: - ? cost + land.

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Infrastructure in Halesworth and Holton

Comment ID 1143

Comment Infrastructure currently needed in Halesworth:

The document acknowledges the need to increased educational provision to accommodate additional 110 pupils. However, it offers no solutions on how this is to be achieved on the existing sites of Edgar Sewter and/or Holton Primary schools.

Loss of further green facilities would be detrimental to both schools and communities.

Parking at both schools create problems which would be acerbated and health and safety compromised.

Our road infrastructure should be reviewed and Phase 2 of the relief road should be revisited before any new developments are designated.

The promotion and encouragement to bring employment to Halesworth is a vital link in preventing Halesworth from becoming a 'retirement town'. There seems to be no cohesive strategy to encourage new businesses to the Town.

The sewage system is operating at near maximum capacity at times and should be expanded to contend with any new housing. A review of the current flooding problems have identified the need for remedial action up-stream of the bridge in the Thoroughfare Halesworth and if we are to prevent another flood in the Town urgent action should be taken.

Attached documents
Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Castlemeadow Care Sanjay Kaushal
Michael Haslam Associates Ltd (Haslam Michael)

Section
Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID
1047

Comment
Castlemeadow Care and Halesworth Campus have been developing for several years a scheme to provide improved sporting and health care facilities for the town, including a number of NHS beds and outpatient facilities, to enhance and maintain the delivery of local services locally that have traditionally been provided from the Patrick Stead Hospital. The scheme includes a Care Home, Community "Hub" building, Extra Care Apartments and bungalows and improved indoor and outdoor sporting facilities and a 3G artificial pitch for all weather sports provision. Our plans have been subject to two public exhibitions in Halesworth and have been very well supported by the local community. The relatively complex land assembly exercise involving Suffolk County Council, an adjoining landowner and the prospective developer is nearing completion and it is hoped to submit a formal planning application towards the end of 2017.

Castlemeadow Care and Halesworth Campus welcome and support the proposals in the Draft Local Plan as set out in policy WLP4.1. We believe that all elements of this proposal are essential to ensure that the delivery is both possible and sustainable.

However, we would like one small amendment to the Halesworth/Holton Healthy Neighbourhood indicative masterplan. Castlemeadow Care has now completed its land acquisition and their ownership is shown edged with a purple line on the attached plan. Can you please revise the allocation plan to include in the health allocation all the land shown on the attached plan that is now owned by Castlemeadow Care.
Attached documents

Charlotte Slater

Section | Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID | 621

Comment | * I also think it is important to think about the timing of the building of the proposed new developments. For example I believe building on the proposed WLP4.1 plot should be first to go up, as it is the site with key improvements to the towns infrastructure and 215 new homes. Allow this to be built, established and for the town to accommodate the new population, before starting on the next phase of building homes. This is after all a 20 year plan.

Attached documents
Christine Turner

Section  Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID  982

Comment  
I moved here in November 2016, having been finally driven out of a town we had loved by the relentless march towards total coverage of any green space by houses, houses and more houses. Colchester is a place that can no longer be called "Britain's Oldest Recorded town" because it isn't. It is "EVERYTOWN" somewhere in Essex. The town we had loved and lived in since 1972 has been destroyed by greed and I worry now for Halesworth's future.

Depressed and defeated, we arrived in Halesworth – a place we knew of from previous visits to nearby family. We relished the peace and quiet, the rather quaint Town Centre, the open friendliness of its people and congratulated ourselves on finally making the rather traumatic move. Until the evening of the 19th September where, in a school hall, our plans for a rosy future were destroyed.

In a few hours any new-found peace of mind was stripped away when I discovered "my" views were going to be replaced by a VILLAGE consisting of 200 homes (= at least 400 cars), sports facilities, health care centre, a retirement community, new roads.

I know peoples’ reaction will be to comment on my selfishness. I have no rights to a view, peace of mind, certainty; but I am distraught that 'someone' has decided that what this part of Halesworth needs is a development that will totally obliterate any memory of what was here previously.

A speaker at the meeting mentioned that one of the things needed here is a Secondary School. Surely it would make more sense to build a school, with all its attendant buildings, on this site where there has been a school before, rather than more houses, containing more children who will have to be schooled outside of the area.

And why SO many houses? 200 houses. 200. Streetlights, roads vehicles,
general hub-bub and clutter. At least, with a school there could be some times of calm.

We have also been told by local people that they believed there to be some kind of covenant protecting the sports field opposite my house. If this is the case, perhaps some of the Councillors could have investigated that rather than filling in pieces of paper with drawings of little houses with no parking facilities – which seems to be the way of most councils these days...

A mass of people and houses does not equal a thriving, successful town. It equals a soulless place that people will avoid rather than visit. The attractive, uncluttered towns and villages with some character will attract the visitors. Not a place that is snarled up with too many cars and inadequate roads.

As you draw up your plans for the future of Halesworth, please spare a thought for the people who live here – whether they have been here 60 years or 6 months. Let us enjoy the space, the tranquility, the greenery; the gentle calm that is at the core of this little town which does not need to expand unreasonably to provide a solid basis for a good life.

Even if these plans are modified in some way or abandoned completely, in those few hours in a local School Hall, the damage has been done. My peace of mind is compromised; I do not feel safe here any more.

On a slightly different topic (but the same evening), I was appalled at the Waveney Councillor who would not respond to the concerned school employee's assertion that the new school space promised (for future expansion) would consume the playing fields. Children need space and fresh air. Another building on this precious commodity is NOT what is required and workable alternatives should be sought. And Waveney Councillors should be taught to give a straight answer to a straight question. There is a very large trust issue looming with both these proposals.

Attached documents
Colin Turner

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 981

Comment With regard to the proposal above, would it not make more sense to have the "Health Facilities and Retirement Community" adjacent to the Residential area, thus leaving the existing Sports Field intact.

This would reduce the impact of building upon ALL the adjoining areas ensuring the whole site is then surrounded by green and open spaces, with minimal disruption to all concerned.

The above attachment is my attempt at drawing what I have, in essence, written.

Craig Lockwood

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 618

Comment WLP4.1

It would appear at this stage of the master planning of the site that no consideration has been given to the existing chicken sheds which border the proposed development area, depending on prevailing winds and odour results this could have a major implication for the potential numbers proposed within this allocation as the levels may exceed those within the environment agencies tolerances for domestic units. The major proposed access could have forward visibility issues due to the severe change in ground contours towards Bungay Road which again would impact on potential numbers and arrangement of dwellings should an alternative access point be required. My greatest concern with this allocation is the trigger for facilities to be provided, the town has had a lack/no sporting facilities of any merit for the 37 years I have lived in the town and it is a big reason why many young families move away or their children attend clubs for nearby towns/villagers. For Halesworth to have any sense of community this needs to be addressed as this is not acceptable for a town of this size, several generations have suffered from this lack of provision and to place the delivering triggers further down the line only worsens this, not to mention the new residents will also suffer this for a period. I would propose that the trigger for the 3G pitch be moved to the 25th occupation as this would mean it being delivered some 2 years after receiving planning permission, not nearly 4/5 years which is unacceptable. The 3G pitch would allow for numerous sports to be played all year around providing many clubs for all ages to benefit and reduce the need to travel 15-20 miles to have this opportunity. The proposal to use Loam Pit Lane for cycle access needs serious consideration, I lived there for 20 years and it has changed dramatically, it is not maintained, has several secondary rear accesses from the Briar Close development which coupled with the lack of hedge trimming etc. creates a serious safety issue. I have been unfortunate enough to witness a cyclist death at the bottom of Loam Pit Lane as the bottom suffers from poor visibility and has a reasonable gradient running the whole length.
of it, if this is to be proposed improvements to the lane and safety measures should be implemented. Having said that a fully surfaced cyclepath to the proposed new development would create a very good link within the cycle network but the current track would not be suitable. The existing child’s play space at Dairy Hill can hardly be considered as an existing facility, it is in very poor condition as many of the other satellite play areas are, this equipment would be better lost with the area used for a better purpose, the town park which is well equipped now following the work by GAPPA locally, is a short walk away and encourages families to get active. This approach could be used for many of the other areas and then put them to better use such as small infill development that can generate money for improved facilities such as being proposed on this allocation site.

Attached documents
Dinah Morley

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 15

Comment Whilst broadly supporting the plan, although sad that housing will encroach on Holton ’village, I am concerned that the infrastructure in the area i.e. schools, health faculties, will not support this considerable expansion of dwellings. I trust this is being seriously addressed, given the current difficulties nationally of teacher and doctor recruitment.

Attached documents
The Halesworth / Holton Healthy Neighbourhood is an excellent initiative for the town and surrounding villages. The indicative masterplan shows an appropriate disposition of development on this large site and residential use of the farmland to the north of Town Farm seems acceptable provided that no additional vehicle access is imposed on Loam Pit Lane.

Nevertheless the Plan proposal is for far too many houses in the wrong place and the proposed density of 30 dwellings per hectare is excessive for a site this remote from the town centre.

Residential development of the extent proposed, together with the outline consent granted behind Hill Farm, also extinguishes a significant proportion of the Strategic Gap included in the previous Local Plan (and included in 4.2 above) intended to maintain the separate identity of Holton and Halesworth and prevent development sprawl.

While there is yet no detail of what is proposed, the expectation is that it will be tract housing of the now familiar stereotype - miniature 'executive homes' crammed together on tiny sites with just enough space for two cars - as was the the case in the illustrations of Blyth Park behind the suburb that has grown around Hill Farm.

I appreciate the concern and consideration that has been expressed about the impact of development on Listed Building at Town Farm and hope that this will be sustained in the detail of the project.

Archaeology

There is no mention of archaeology in the WLP but it seems reasonable to assume that the significant stretch of Roman Road leading north from the Broadway roundabout to Bungay - Stone Street - was constructed to some serious militaristic purpose pre-dating modern Halesworth. If the alignment
of this road is projected southwards, it follows the spur of high land on which Town Farm is situated - just clipping the north-east corner of the chicken sheds - and descends across the development site behind Hill Farm to a point close to the eminence in the Holton Road where Castle House now stands; a situation where a Castrum would have commanded the up-waters of the possibly then navigable River Blythe.

This scenario is speculative but it should be incumbent on developers to investigate further and keep a watching brief to avoid inadvertent destruction of valuable archaeological material.

Green infrastructure improvements should include restoration of overgrown ponds and the Green Lane adjoining the south-east boundary of the northern part of the WLP 4.1 site leading to Bungay Road.
Erik Wilcock

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 296

Comment Halesworth Healthy Neighbourhood is well positioned strategically to provide a variety of amenities which are currently deficient in Halesworth.

Attached documents
Halesworth Campus Ltd Eric Wilcock
Michael Haslam Associates Ltd (Haslam Michael)

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1055

Comment Halesworth Campus and Castlemeadow Care have been developing for several years a scheme to provide improved sporting and health care facilities for the town, including a number of NHS beds and outpatient facilities, to enhance and maintain the delivery of local services that have traditionally been provided from the Patrick Stead Hospital. The scheme includes a Care Home, Community "Hub" building, Extra Care Apartments and bungalows and improved indoor and outdoor sporting facilities and a 3G artificial pitch for all weather sports provision. Our plans have been the subject of two public exhibitions in Halesworth and have been very well supported by the local community. The relatively complex land assembly exercise involving Suffolk County Council, an adjoining landowner and prospective developer is nearing completion and it is hoped to submit a formal planning application towards the end of 2017.

Halesworth Campus and Castlemeadow Care welcome and support the proposals in the Draft Local Plan as set out in policy WLP4.1. We believe that all elements of this proposal are essential to ensure that the delivery is both possible and sustainable.

However, we would like one small amendment to the Halesworth/Holton Healthy Neighbourhood indicative masterplan. Castlemeadow Care has now completed its land acquisition and their ownership is shown on the attached plan. Can you please revise the indicative masterplan to include in the health allocation all the land shown edged with a purple line on the attached plan that is now owned by Castlemeadow Care.

Halesworth Health Karen Kerridge

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1439

Comment We are very supportive of the Halesworth Campus plans to develop and improve sport and leisure facilities, in conjunction with the skills centre. There are enormous benefits to both physical and mental health from this, and Halesworth's current sport and leisure facilities are very restricted. The development will encourage less obesity, especially in children; physiotherapists can extend their range of support through gym facilities; pulmonary rehabilitation, exercise aiding recovery from cancer, chair based exercise for those with disability, yoga and pilates, are other examples of potential benefit. Cycling routes locally are much needed, and essential to be in place to and from the site. In the longer term a swimming pool would be hugely beneficial for health.

Another enormous benefit will be the skills centre training. The proposed construction, and sport and leisure training will offer great opportunities for local young people. In addition it is hoped and intended that there will be healthcare training in conjunction with the new Castlemeadow Care facility. This is vital for the area now and in the future.

Attached documents
Halesworth Playing Fields Association Anne Fleming

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 291

Comment The photographs used in the draft consultation document of the Halesworth playing fields are unacceptable to the trustees. The bowling green at Halesworth Playing Field is the best in the County. The football pitches very well maintained and used. This despite the 'dog mess' which was excessive until the routes were blocked off. The tennis courts are well maintained. The photos used showed HPFA to be a neglected, almost derelict site. This is a gross misrepresentation. I will send photos for the final version of the plan. I don’t know who took photos. No one consulted with HPFA.

Attached documents
Halesworth Playing Fields Association David Thomas

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1167

Comment In the section specifically dealing with Policy WLP4.1 on page 99, there is the statement that "The development of this site will help deliver "the vision of Halesworth Playing Fields Association to provide enhanced sporting facilities at Dairy Hill". HPFA would like to know how this help is going to be provided as it is not currently involved in the Halesworth Campus Ltd/Halesworth Health project. An answer would be appreciated.

The HPFA has a Development Plan in place which it is already starting to implement. Additional funding and support would increase the rate at which these development objectives can be achieved. Completing HPFA’s Development Plan would support the objectives laid out in WLP4.1

To avoid the confusion and waste inherent in having two competing outdoor sports providers for Halesworth, it would be logical to transfer to HPFA the field adjacent to Dairy Hill which is being proposed as compensation for the loss of open space on the old middle school site. The HPFA would immediately be able to make effective use of the extra space and more easily manage the pitches needed for the increasing number of teams. Funding from the project will be needed to effect this transfer.

If HPFA is to be mentioned in the context of WLP4.1, it needs to be treated as an independent entity and separate from Halesworth Campus Ltd and its Healthy Neighbourhood Policy. Any developments must incorporate HPFA's "vision" and ensure that HPFA's Business Plan objectives are achieved. These objectives are not in conflict with those of Policy WLP4.1 but HPFA intends to remain an independent charity with the objective of continuing to provide a range of sports facilities for the residents of Halesworth and the surrounding villages.

Attached documents
Halesworth Playing Fields Association David Thomas

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1161

Comment The Trustees of Halesworth Playing Fields Association (HPFA) were very surprised to see that HPFA is listed as a partner organisation of Halesworth Campus Limited and Halesworth Health in implementing Policy WLP4.1.

This came as a major surprise since HPFA has not been consulted in any way and was totally unaware of the plans for Policy WLP4.1. Yet reference is made to HPFA's "vision" in the context of Halesworth Campus Limited and Halesworth Health's plans even though HPFA has not shared its "vision" with WDC.

HPFA is an independent charity and has no relationship with either Halesworth Campus Limited or Halesworth Health

Additionally, HPFA's Dairy Hill site is outside the boundary of the site allocated for the implementation of Policy WLP4.1 and consequently the Dairy Hill site will currently play no part in the implementation of Policy WLP4.1.

Attached documents
Halesworth Town Council N Rees

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1348

Comment

The Halesworth Playing field Association’s Dairy Hill site is identified as being part of Halesworth/Holton Healthy Neighbourhood although it is understood that to date, it has not been party to any of the discussions for Policy WLP4.1. In the absence of consultation, how can WDC know what HPFA’s "vision" is for its planned development of its Dairy Hill site?

HTC would like WDC to revisit this issue and, in doing so, include the HPFA in future consultations. This will enable the development of a policy which takes a wider perspective, providing a balanced approach to sports provision in the town. HTC wants people to have access to as wide a range of sport and leisure facilities as possible and to make the best use of existing facilities.

Play areas in the new developments must be specifically planned so that they can be readily overseen, they should be interestingly landscaped and provide facilities for all age groups. They must not be the odd corners and plots of land where the developer cannot fit a dwelling.

The planting of trees and shrubs should be used creatively to enhance the appearance of the new developments. It would build on the work carried out by Halesworth in Bloom to make Halesworth an attractive and colourful place to live and to visit.

Provision of a single access off Harrisons Lane for the 215 dwellings will need major civil engineering work due to the narrowness of the lane and the steep bank which will have to be breached to gain access. This number of dwellings will result in at least 350 cars using the narrow Harrisons Lane to access the Norwich Road or pass through Holton village, past the primary school, to reach the A 12. Harrison’s Lane is already used as a rat run and the increase in traffic from this new development will exacerbate the situation.

Loam Pit Lane is already a pinch point for residents of the lane. It opens,
after a tight bend, straight onto Holton Road where visibility is severely restricted by the railway bridge in one direction and residents parked cars in the other. This is not a safe exit for cyclists.

As yet, it is unclear what the proposed new medical facility in the Halesworth/Holton Healthy Neighbourhood will be but it is understood that it is to be a privately owned care home. Currently, the Council notes there is no guarantee that the National Health Service will fund any resources in this private facility. Consequently, it cannot be considered to be a replacement for the recently closed Patrick Stead Hospital, let alone develop the capacity to meet the needs of a larger population

Attached documents
Historic England

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1386

Comment This allocation is proposed for 215 houses, a health care facility, a retirement community, indoor and outdoor sports facilities, and education provision. Grade II listed Town Farm is identified in supporting text as being within the site boundary. It was formerly known as Pesthouse Farm and was used as a smallpox isolation hospital. Paragraph 4.12 states that the development should be laid out in such a way to limit the impact on the setting of the Farm, however, consideration of the Farm and its significance does not appear in the text, policy or indicative masterplan.

We have not seen evidence of a heritage impact assessment setting out the whether or not any development is possible, what the effects would be of development on designated heritage asset and its setting and, if development were possible, what mitigation measures and quantum of development would be appropriate given the detailed information about the site. We would expect such an assessment to determine whether an allocation should be taken forward or not and, if so, that its findings are incorporated in the policy and supporting text. In the absence of such an assessment, we do not believe that the evidence is there to justify the inclusion of this site allocation with this level of development.

Attached documents
J Janes

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1211

Comment The proposal for 215 new homes adjacent to the old middle school site in Halesworth will not allow a sufficient area of strategic gap between it and Holton.

The density of housing for this site is too great - it is not clear why this is proposed to at a density of 30 dwellings her hectare, and other sites only 20 or 25.

The site itself is unsuitable as it slopes, and, after heavy rain, Bungay Road turns into a stream.

The proposed access road is unsafe, as Harrisons Lane is narrow and on a steep slope.

Too much traffic will be generated by cars from the proposed housing and by people travelling to the sports centre; it will be unsafe for pedestrians; pollution from vehicles will be enormous.

Attached documents
J Janes

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1213

Comment This site is not suitable for such a large development owing to its distance from the town centre. Alternative land at the southern edge of Halesworth would be more suitable owing to its flatness and more easy access to the Co-op supermarket.

The density of housing proposed is too great for the site. It is not clear why it is suggested at 30 dwellings per hectare, rather than the 20 or 25 proposed for other proposed developments. However, it can be assumed that this is because it would generate income to pay for the 3G pitch. Thus many people's lives would be blighted by increase in traffic movements, noise and pollution for the few who would make use of the facility.

The slope of the site makes it unsuitable to develop. Bungay Road becomes a small stream when there is heavy rain; this would become catastrophic if this proposed development went ahead.

Harrisons Lane is unsuitable as access to the proposed housing. The extra cars generated would have to travel into town along this narrow road, along with the buses that already have difficulty in getting up and down. It is na"ive to think that people will walk or cycle - this is not practical for those with children and the elderly and disabled when carrying shopping. The amount of cars generated by such a proposal would be impossible to accommodate along the narrow road. It would be unsafe for pedestrians.

The sports facility aims to attract people from around the area which could mean hundreds of cars accessing the old middle school site from Harrisons Lane; again this is not sustainable. When the original campus plan was proposed it was aimed to make access from off the Norwich Road by way of a new road. This would still be the best and most sensible solution for any of the proposed developments - a new roundabout at the junction of the Norwich and Bungay Roads with a road at the south end of the field and parallel to Harrisons Lane, leading to a small roundabout in the centre with access to the skills centre, the sports facilities, the health care facilities and
the surgery would better dissipate the traffic, rather than it all going up and down Harrisons Lane.

The suggested amount and location of tree-planting is insufficient and should be much greater. Please be aware that the sounds of people playing on the current old middle school playing fields travels and words (sometimes swear words) can be heard clearly in neighbouring properties. Also the light pollution from floodlights is intrusive to neighbouring properties.

Attached documents
Joyce Moseley

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 297

Comment Looks like a very well thought out plan - strategic and pragmatic. The 'healthy neighbourhood' concept looks v. forward thinking combining, as it does, facilities for a wide range of people. Please ensure housing has high architectural values not like some of the housing around.

Attached documents
Liz Calder and Louis Baum

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1538

Comment Halesworth/Holton Healthy Neighbourhood

We note with relief that (4.10) "access to the residential element of the development should be from Harrisons Lane" and that "Loam Pit Lane should not be used for vehicular access", but we would welcome clarification about what is meant by "facilitate cycle access". Loam Pit Lane is already capable of providing cycle access and we would be concerned if significant enhancements were envisaged. Loam Pit Lane is used by many children and elderly people and anything that would encourage cyclists to speed would be alarming.

Attached documents
Mrs S Orton

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 641

Comment As for where I live my property would be directly opposite a main entrance to your proposed development and naturally I'm not happy about it firstly because as I've said 215 homes on one site is unsuitable in this area. Harrisons Lane is a narrow road especially at the entrance to it and is already used as a cut through from Holton. Also I do not the layout of your health facilities I think the area designated as indoor and outdoor sport should be used for this purpose and the whole of what was the middle school site and playing fields used as it was originally intended for sport.

Attached documents
Pauline Wilcock

Section  Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID  294

Comment  The Halesworth/Holton Healthy Neighbourhood plan for a mixed sport/health/education and dwellings development is very exciting. It is to be hoped that the planned NHS beds for the planned Health Care Facility will be realised as part of this.

Attached documents
Richard Pymar

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 96

Comment This is clearly OVER DEVELOPMENT. Just recently the town suffered a deluge of rain, lifting man covers. The quicker people get it into their heads that we live in a valley.............the better

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1345

Comment Richborough Estates are promoting land at Harrisons Lane, Halesworth for residential development (refer to site location plan at Appendix A).

This site forms part of the 'Halesworth/Holton Healthy Neighbourhood' as identified by Policy WLP4.1 – 'Halesworth/ Holton Healthy Neighbourhood' of the 'First Draft Plan'.

Policy WLP4.1 allocates land for mixed-use development at Harrisons Lane, Halesworth. This proposed allocation extends over 22.05 hectares and comprises of the following comprehensive mixed-use development:

* 215 dwellings;

* Health Care Facility and Retirement Community (approximately 2.3 hectares);

* Sports facilities including; playing pitch, 3G pitch and indoor sport facilities (approximately 8.6 hectares); and

* Education/ Training

The purpose of this representation is to support the continued allocation of the site for development and to confirm that Richborough Estates are committed to working with Halesworth Campus Development Board and the Halesworth Playing Field Association to deliver the aspirations set out in draft Policy WLP4.1.

The site is available, deliverable and achievable as demonstrated by the initial design feasibility work and technical assessments attached. Where relevant, comments have been made in respect of specific draft policies.

About Richborough Estates

Richborough Estates is one of the UK's most successful strategic land
promotion companies. They have been appointed to promote land in Halesworth to deliver residential development as part of a holistic approach to delivering growth in this part of the District.

They work on behalf of a wide range of landowners including private individuals, charities, trusts and local council/government estate departments – promoting land through the planning system to secure housing allocations and planning permissions for residential development. They then manage the sale of the site from the landowner to the housebuilder who then build out the site and deliver homes.

Richborough was founded in 2003 and the team works in partnerships with landowners, LPAs and stakeholders to bring land forward for housing. The team is made up of a wide range of development experts who deal with land acquisition and planning issues. Richborough's objective is to deliver 'oven ready' sites to house builders ensuring that planning permissions are quickly turned into homes for local people. Its approach is closely aligned with the Government's key aim of boosting the supply of new homes.

Richborough is currently promoting over 20,000 dwellings through various stages of the planning process across the UK, and on average can be promoting up to 100 sites at any one time. Their aim is to leave a lasting legacy for the communities within which they work.

The manner in which Richborough Estates deliver sites for housing development is described in a report prepared by Lichfields entitled 'The Role of Land Promotors in Housing Delivery' (May 2017). A copy of the report is attached to this submission (refer to Appendix B).

The following are comments we would wish to make insofar as the draft Local Plan relates to this site and the planning merits in delivering this proposed allocation.

From a site-specific perspective, we support the identification of the Halesworth/Holton Healthy Neighbourhood allocation and consider the plan at Figure 16 to be achievable.

In terms of the specific wording of Policy WLP4.1 – Halesworth/Holton Healthy Neighbourhood, we suggest the following minor changes to aid the delivery of the site (indicated in bold and underlined) -

The Halesworth/Holton Healthy Neighbourhood (22.05 hectares) as identified on the Policies Map is allocated for a comprehensive mixed-use development comprising:
* Approximately 215 dwellings

* Health Care Facility and Retirement Community (approximately 2.3 hectares)

* Sports Facilities including, playing pitch, 3G pitch, and indoor sport facilities (approximately 8.6 hectares)

* Education/Training Facility

The site should be developed in accordance with the following site-specific criteria:

* Residential development will be located on the northern and eastern parts of the site, which has an area of approximately 7 hectares. The site will be developed at a density of approximately 30 dwellings per hectare.

* The health care facility and retirement community will be located on the north-western parts of the site.

* The sports facilities will be located on the central parts of the site. Sports facilities on the site should include a 3G artificial pitch for all weather sports provision. This should be enabled by residential development on the site and should be completed following completion of the first 125 dwellings.

* The North Suffolk Skills Centre will be retained on the site to be used for educational, voluntary and community purposes. This includes providing accommodation for local community organisations.

* Existing facilities at Dairy Hill, including the sports pitches, martial arts school, tennis courts, bowling green and children's play space, will be retained.

* Access to the residential development should be from Harrisons Lane and will be entirely separate from the other proposals for the Halesworth/Holton Healthy Neighbourhood.

* Existing trees and hedges on the site will be retained. There should be tree planting along the eastern edge of the site totalling approximately 2.5 hectares to minimise landscape impact of the site.

* Development should be designed to encourage walking and cycling. Existing public rights of way on the site will be retained and new pedestrian access provided to include connectivity both within the site and with neighbouring parts of Halesworth. Loam Pit Lane should provide pedestrian access...
and cycle access to the site.

* A Transport Assessment and Travel Plan should be submitted with any planning application.

The rationale for an increase in the number of units that can be brought forward in advance of the 3G pitch is as follows –

* From a design perspective, it allows for a sufficient quantum of development to come forward to facilitate the delivery of essential infrastructure and complete the development cells fronting Harrisons Lane;

* A scheme of 125 dwellings (circa 81 market homes excluding affordable dwellings) will be significantly more attractive from a market/commercial perspective, thus increasing the likelihood of the site being delivered in a timely manner; and

* There will be greater certainty that a large portion of the site can be delivered within 5 years, therefore bolstering the Council's 5-year supply position.

An indicative masterplan is appended to these representations to illustrate how the residential element of the scheme could be delivered alongside the health and community facilities to the east.

These representations are accompanied by an illustrative masterplan (Appendix C) which identifies how the residential development can come forward on this site.

Whilst this design work is very much work in progress, we are confident that these proposals will be compliant with the emerging policies and deliverable.

Unit numbers/density

In line with the draft allocation, the scheme can accommodate approximately 215 dwellings plus associated roads and infrastructure. Key points to note are as follows -

* A development of 215 dwellings on 7.15 hectares of land amounts to a density of approximately 30 dwellings per hectare.

* In line with policy WLP8.1 (Housing mix), the layout allows for a mix of dwellings which are indicatively plotted.

* Larger 4 bed units are generally 1450ft in size. A handful of larger units at
1800ft² are also shown.

* Allowance is made for affordable housing provision, the requirement of which is 35% (Policy WLP8.2). This totals 75no. 1, 2 and 3-bedroom dwellings which are grouped in clusters of up to 15no. units.

* Public Open Space amounts to: 8.9 acres/ 3.6 hectares.

Green infrastructure

* The proposal provides a range of green space typologies including; natural and semi-natural green space, natural play and equipped children's play (LEAP).

* In line with Policy WLP8.29 (Design), the layout of GI retains existing landscape and integrates surrounding areas/ spaces.

* The existing field structure of the site is retained which provides a series of pedestrianised green corridors.

* Development is offset a minimum of 5 metres from existing hedgerows – although some hedgerow removal will be necessary to facilitate the proposed vehicular access.

* To address views of the development from the east, and utilising the rising landform of the site, a series of landscape layers are proposed at high, medium and low points of the site. These are indicated on the drawing and are designed to filter/ soften the overall development rooftscape.

* Lower density housing patterns serviced by low-key residential lanes are proposed on southern and eastern edges of the development to address the relationship of the site with the countryside.

* The design makes allowance for the necessary development offsets to the proposed equipped play area, which is situated in close proximity the public footpath. Dual aspect dwellings are indicated to provide natural surveillance.

Public Open Space provision

In line with east Suffolk's supplementary planning guidance, the likely requirement for open space is as follows:

Requirement: 43m² x 215no. dwellings: 9245m²/ 0.92 hectares. Provision:
8.9 acres/ 3.6 hectares.

The masterplan therefore confirms that there will be an over-provision of approximately 2.68 hectares.

Links

There are a number of pedestrian and cycle links which are proposed between the residential area to the intended enhanced sports and social care facilities and the skill centre nearby. These links will extend to the railway station, with its services to Ipswich (one hour) and Lowestoft (forty minutes), and the town centre.

There is already a well-used footpath network in the area which will be enhanced to link our proposals to the existing community. There is also an existing bus service along Harrisons Lane, together with Route 1 of the National Cycle Network. Details of these links are provided in the attached Infrastructure Report by Create Consulting (refer to Appendix D).

As the proposals for our site develop, through discussions with both Councils and adjacent landowners, and the wider public consultation, the proposed links may need to be changed to establish better connectivity.

Landscape & Visual Appraisal

Preliminary Landscape and Visual Appraisal work has been undertaken by Tyler Grange to understand the baseline context and inform the preparation of the Illustrative Masterplan.

Landscape Character

The Waveney District Landscape Character Assessment (April 2008) places the site within the Blyth Tributary Valley Farmland LCA; however, the key characteristics relate to the wider and more remote rural landscape, rather than the transitional settlement fringe location.

The site itself currently comprises gently sloping fields used for agricultural purposes to the east, an area of hardstanding currently occupied by poultry sheds to the south, and a flatter field associated with the former Halesworth Middle School and the North Suffolk Skills Academy to the west. There is clear urban influence to the north and south; and, the existing network of boundary vegetation presents an opportunity for retention and enhancement.

Visual Context
The site is relatively enclosed, as viewed from the surrounding landscape, owing to the undulating topography, and layering of mature field boundaries and existing built form. Vegetation retention and enhancement, especially along the eastern edge, will aid in the assimilation of the development and prevent any sense of visual coalescence with the village of Holton. Visual receptors (including nearby residents and users of adjoining highways and public footpaths) are localised and amenity has already been influenced by the surrounding landuse.

Landscape Recommendations

In response to the landscape and visual context of the site and a review of available SPD, a series of landscape opportunities and constraints have been developed by Tyler Grange to guide how development can respond positively to local circumstances and addresses opportunities for landscape enhancement. The broad themes / layout considerations and recommendations at this stage, include:

* Consideration of development frontages along Harrisons Lane, with the retention and strengthening of hedgerows where possible;

* The retention of the existing field hierarchy throughout the site created by the existing hedgerow and tree vegetation to provided structure and break-up the appearance of the development;

* The creation of a 'Green Lane' along Loam Pit Lane, with additional landscaping on the skyline help to break-up the appearance of the development;

* Maintaining the sense of a gap between Holton and Halesworth with the incorporation of a woodland block on steeper land to the east of the site;

* The placement of lower density and outward-facing development parcels where development edges are more sensitive;

* Creation of an area of open space to the south of the site, providing a central core of recreational amenity and connectivity to other retained landscape features; and

* The creation of footpath linkages along green corridors to enhance recreational amenity within the site.

Capacity to Absorb Development

Overall, the development of the site is deemed suitable from a landscape
and visual perspective. In terms of landscape character, new built form will sit comfortably within the established context, and relate to the settled edge along Harrisons Lane to the north; and, with the new woodland planting to the east and enhancement of other landscape features, built form could be assimilated without harming the characteristics of the wider rural landscape. In terms of visual context, the relatively high levels of containment provided by existing vegetation will be retained and enhanced through additional planting. Where new built form is likely to be visible, it will not be uncharacteristic, and can be designed to respond to existing street scenes and the local topography. As such, through the sensitive development of the site, there is opportunity to retain and enhance existing landscape features and to provide a residential development that would correspond well with the existing residential context, and provide an improved transitional green edge to Halesworth.

Access

* A single point of vehicular access is proposed into the residential element of the site via Harrisons Lane.

* A 5.5m wide principal street provides a looped route through the development to address the single point of access and underpins a hierarchy of secondary streets and residential lanes. Grass verges align some sections of this route to achieve a verdant character and reinforce its importance.

* To achieve a good degree of legibility, a number of focal point spaces are provided along the principal street which demark junctions with secondary streets. This principle, coupled with varied spacings between housing frontages, accords with Policy WLP8.30 (Housing Density and Design).

* If required, a potential emergency access is indicated leading onto Harrisons Lane.

* The arrangement of new streets aligns with contours of the site and assists the phased delivery of three development parcels, which each sit within the confines of the existing field structure

* In line with policy WLP8.29 (Design) maximum permeability is achieved via a new network of pedestrian footpaths which circulate the development. These join with the existing provision on Harrisons Lane and safeguard linkages to adjacent developments to the west and south.

* Existing public footpaths are proposed to be retained and incorporated
into Green Infrastructure.

* The masterplan makes allowance for car and cycle parking standards and minimum garage sizes in line with Suffolk County Council guidance. A bias towards on-plot parking is shown, an approach which should also assist with any groundworks required to address levels.

Please refer to Appendix D for the Technical Report prepared by Create Consulting

Drainage, Ground Conditions & Utilities

The attached Technical Report prepared by Create Consulting (Appendix D) details the drainage and utility strategy.

At this stage, it is important to note that the main attenuation basin will be located on the eastern boundary of the site and has been sized accordingly. From a utility perspective, Anglian Water is satisfied that there are no insurmountable constraints to delivery in terms of both foul and clean water. There will be a need to reinforce the gas network, however, this is normal for schemes of this size and is not considered to be a constraint.

It should also be noted that a Phase 1 Site Investigation has been undertaken and the ground conditions are expected to be good, in that there are is no indication of ground contamination or instability.

Ecology

A phase 1 ecology survey was undertaken by Hopkins Ecology. Whilst bat surveys are ongoing, there are not considered to be any insurmountable constraints to development. A copy of the Ecological Appraisal accompanies this document, as Appendix E.

DELIVERY

We believe that there is no impediment to the delivery of residential development of the preferred housing allocation as described in Policy WLP4.1. The land related to the residential allocation is in single ownership and will assist in bringing forward a rejuvenated set of sports facilities, an enhanced skills centre, and a social care home facility with additional medical services.

The development will be policy compliant and, given the background research we have undertaken, will be deliverable. There are no insurmountable constraints to the construction of the site and it can be accessed via Harrisons Lane. Whilst the masterplan for the site is still
evolving, it clearly highlights that approximately 215 residential units can be constructed on the site. As set out in Section 4 of this report the phased delivery of this site is accepted, although we suggest that the initial first phase should be a minimum of 125 units. The specialist survey work undertaken to date does not show that there are any significant environmental constraints to bringing this site forward.

We believe that, given the characteristics of the site, it is deliverable and can assist in bringing forward the holistic vision for Halesworth and Holton which is stated in the emerging Local Plan as follows:

'The historic town centre will be vibrant and will have been supported by new housing and retail development. The town will have enhanced sports and leisure facilities following the completion of the Halesworth Campus and improved facilities at Dairy Hill and will have additional health facilities and an enhanced employment offer, all of which will have helped attract younger people and families to the town. The separate identities of Halesworth and Holton and the sensitive landscape surrounding them will have been protected.'

CONCLUSION

* In collaboration with Halesworth Campus Development Board and the Halesworth Playing Field Association, Richborough Estates are committed to the successful promotion of land at Harrisons Lane. The scheme will bring about real benefits to the town and surrounding villages.

* Richborough Estates are committed to sustainable development, by working with the community, local stakeholders and Planning Officers in order to ensure schemes are mutually beneficial. It is this approach that has been key in the preparations for the promotion of this site.

* The site represents a sustainable location for residential development. The site has excellent access to both the existing facilities within the town and the new proposed uses as part of the wider masterplan.

* The site has been allocated as a key preferred site within the Draft Local Plan. Technical evidence outlined in this representation document demonstrates the site can achieve the amount of development proposed and is acceptable in terms of Highways, Drainage, Utilities and Landscape.

* A suitable access can be achieved from the South side of Harrisons Lane, as well as an alternative emergency access point and new foot/cycleway links. The site is confirmed as not being at risk of flooding from any sources
and a sustainable drainage strategy has been proposed which includes attenuation and infiltration based methods. All utilities are present to serve the scheme.

* Furthermore, the site offers opportunities for areas of open space, landscaping, provision of a wide range of dwellings types and affordable housing.

* The development of the site will help deliver the draft Local Plan’s vision for Halesworth and Holton and provide additional sporting and health facilities on adjacent land, and will thus help promote healthier lifestyles for new residents and existing residents alike.

* Richborough are working with adjacent landowners to deliver the Halesworth/Holton Healthy Neighbourhood in accordance with Policy WLP4.1 to deliver a policy compliant scheme of up to 215 dwellings, along with the facilitation of links in the form of footpaths and cycleways between the two proposals and the sports facilities and skills centre.

* These proposals will continue to evolve over the coming months as well as consultation with key stakeholders as set out in the following paragraph.

* From a housing delivery perspective, the majority of the site will be deliverable within 5 years.

TIMESCALES

* There will be a continuing dialogue with Halesworth Town Council, Halesworth Campus Development Board and other landowners to develop proposals for the Halesworth/Holton Healthy Neighbourhood prior to submitting an outline Planning Application.

* The technical reports relating to our proposals are currently being prepared and it is intended that we will undertake a public consultation in October/November 2017 with an exhibition at the Rifle Hall in the town publicised through leaflet distribution.

* There will also be an opportunity to comment on the proposals via a website. An outline planning application with an associated masterplan will then follow in early 2018.

Attached documents  
opportunities%20and%20Constraintspdf.pdf

http://consult.waveney.gov.uk/gf2.ti/af/799778/135040/PDF/-/8708341%20Appendix%20sit
Simon Weeks

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 273

Comment I think WDC has done a very good thing for Halesworth in recognising and promoting the co-location of these facilities under the banner of Halesworth Healthy Neighbourhood.

Attached documents
**Sport England Philip Raiswell**

**Section**
Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

**Comment ID**
739

**Comment**
Sport England supports this development in principle, as it has the potential to deliver new/enhanced sports facilities for the Halesworth area. Any support from Sport England will be subject to a detailed scheme complying with our policy 'A Sporting Future for the Playing Fields of England'. All new sports facilities and playing fields will need to meet Sport England technical guidance and quality performance standards. All new facilities will need to provide adequate ancillary facilities such as changing rooms, storage and car parking. Any new artificial grass pitch will need to be floodlit and be subject to opening/hours of use conditions to ensure maximum benefits for local sport.

**Attached documents**
Stephen Freeman

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 354

Comment As one of only 2 properties that exist in the corner of the old Halesworth Middle School Playing Field (at the corner of Norwich Road, and Harrisons Lane) I do raise objection to the proposals.

Since Campus took over the responsibility for the site, we have been subject to many changing plans for the site. However, these have always shown any development to be largely on the footprint of the new demolished Middle School. We have always been assured that the current playing fields would remain just that, for use for sport.

Campus assured me that due to restricting covenants on the land building on the playing fields would not be possible. This was confirmed by telephone call to Waveney District Council.

I discovered recently that very quietly, the restricting covenants had been lifted by Suffolk Council Council, and that it is proposed to build a large care home and 3 storey accommodation block, towards the front of the playing field. On the information I have received, the proposed 3 storey accommodation block will be metres from my property, having a huge, detrimental effect on my privacy and quality of life. I hope the proposals can be reconfigured, taking this into account. It is easily possible to re-plan the proposals in such a way that no nearby households are affected in this most intrusive way. I will have literally no privacy with the current proposal.

Attached documents
Suffolk County Council (Corporate Land) Simon Cartmell

Section                   Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID                584

Comment                   As part owner of the site, Suffolk County Council supports WLP4.1

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1628

Comment

• WLP 4.1 (page 101) – Halesworth and Holton. At present, there is no reference to archaeological work. This site will require planning applications to be supported by upfront archaeological assessment, and reference should be made in supporting text and policy.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1716

Comment Main access from Norwich Road and Harrisons Lane plus sustainable links
Transport Assessment required

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1260

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the retention of existing natural features as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 1140

Comment

Housing element: Page 2 of this document stated Work still to be done: Assess the financial viability of proposals and policies in the plan to ensure they are deliverable:

WLP4.1 has question marks on the financial deliverability of the whole site.

There is no problem with the housing aspect as far as financial deliverability but the narrow access from Norwich Road onto Harrisons Lane will have to be addressed to accommodate the significant volume of traffic generated by this development.

The potential flooding problem at the junction with Harrisons Lane and Fairview/Bungay Road would need to be minimised.

Health element: The loss of Patrick Stead Hospital to the community is of serious concern as Halesworth is the furthest market town from any major hospital. Will the proposed health care facility meet all the needs of an expanding community and will there be guaranteed assurances from the CCG that National Health beds and services will be provided?

Sport element: The WDC Green Infrastructure Strategy July 2015 identified that "Halesworth has the poorest access to sports facilities in this part of the District" The approval, construction and financial support should be a priority if National Government guidelines on Health and Wellbeing are to be supported.

However, close inspection of the proposal indicates the loss of the flat land behind the Skills Centre is to be replaced by a field with a very steep sloping field with power lines running across the site. This does not make economic sense. The levelling of this land to accommodate a 3G Pitch and Tennis/Netball Courts will consume a great deal of any money from the sale of the former Middle School site. Also page 64 of the WDC Green Infrastructure Strategy July 2015 indicates that additional tennis courts are
not required as the 3 courts at Dairy Hill meet existing demand.

The facilities currently available at Dairy Hill should be maximised to enhance the site and increase the use of the site. The current charity provider should be encouraged, by grant provision (CIL/Section 106), with support from the various sporting bodies rather than undermine the current users and create fragmentation.

We noted from the presentation given to members of the public at Halesworth on Thursday 14th September, that sport would be catered for within WLP4.1. Therefore consideration should be given to the future of the Basley Ground, Bramfield Road, Halesworth as this seems isolated from the main sports provision.

Education element: We welcome the commitment to the North Suffolk Skills Centre and the extension and improvements of these important educational facilities. It states that accommodation will be provided for local community organisations but this should not be at the expense of vocational training or the long-running, very successful Apollo Centre also on the site. Apart from the Apollo Centre, Halesworth has poor provision to meet the needs of the youth and it would seem logical to keep this facility in this location (sport and vocational training).

Attached documents
Watts

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 251

Comment I believe there is a mistake in section 4.7. The site is not bordered by Fair View Road, but is bordered by Harrisons Lane.

Attached documents
Watts

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 252

Comment Speeding traffic though Halesworth and Holton already ignores the 30mph speed limits on Fair View Road, Bungay Road and Harrisons Lane. Hardly any vehicles stay within the speed limit. This development will add many more cars, pedestrians, playing children, pets etc. What measures will the local authority and the police take to ensure that speed limits are strictly adhered to (maybe even reduce the speed limit)? What measures can be incorporated into the transport infrastructure to reduce the risk of accidents caused by excessive speeding and extra volume of traffic?

Attached documents
Will Kerslake

Section Policy WLP4.1 - Halesworth/Holton Healthy Neighbourhood

Comment ID 896

Comment If the 3G pitch is done after the 100th house is completed will the sports hall and other facilities ever be built? with all these developments being proposed around Halesworth would the cil tax go towards the sports facilities.

Access to housing onto Harrisons lane would have a major effect on the residents of and around the area, Harrisons lane is not suitable to access housing on this scale.

Attached documents
Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

amanda crane

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 691

Comment a) Traffic on Roman Way leading onto London Road – I bike to work each day and can sometimes wait there many minutes to get onto London Road. This junction is already very busy and with the addition of 200 more houses, the level of traffic is going to increase dramatically and this junction will become even more of a problem.

There is already a major issue with cars coming from the Coop roundabout and turning right into Roman Way – they severely cut across the road and many times there has been near misses.

This leads me randomly onto white lining which is hardly ever done nowadays and is an essential thing which keeps people aware of the road parameters and boundaries.

Although you may have had a camera up near the bottom of the road onto Chediston Street (a few months back) I still think you need to reassess the traffic issue.

b) Access to new estate: When I went to the Rifle Hall a few months back and saw the presentation from the developers I was surprised to see only one entrance into and from the new proposed estate. This being at the bottom of Roman Way joining onto Chediston Street. I cannot see how this can be considered safe or adequate and will put an enormous strain on that corner, lorries already struggle to turn into that junction. I realise that you are going to move Roman Way over and put in a roundabout but even so I do not consider one way in and out sufficient or safe.

c) Flooding – My property backs onto the proposed development, in fact I am going to be one of the most affected. Currently when it rains heavily the water runs off the field behind and into my back garden. We have tried
many times to get Hopkins Homes to help us but they are not interested as they have moved on and 'it's not their problem'. My concern is we already have a problem with flooding and will this new development cause further issues. Basically I feel that as soon as the developers have the green light to build then the Councils seems to lose control of what they are doing (or rather not what they should be doing).. I realise this must sound like a random thing to say but how can we have been left in this muddle if someone somewhere is supposed to be keeping check on major issues like drainage. We have video footage if you would like to see it .. we regularly have to lift the manhole covers in our garden and sweep the water into it. This actually happened on Christmas Day a few years back. My point here is that you need to pay careful attention to SURFACE WATER run off, this area is very undulating and not enough attention could cause even more problems than we already have.

d) Loss of outlook – now this point is very important to me. I have taken photos and attached the document which I sent previously to Richard Brown Planning, Halesworth Town Council, pbc@eastsuffolk.gov.uk back on 27-02-17.

As you can see my outlook will be majorly affected by the proposed siting of the houses which will be set up much higher than our houses.

During the meeting on Thursday you mentioned paying attention the bank running parallel with Roman Way but no mention of 5 houses that will be mostly affected by the new estate – nos 19, 21, 23, 25 & 27 Roman Way.

I would welcome you to come to my house and stand both inside and outside and see how it will feel to have houses 30 meters from the fence and right up on the skyline of our windows.

I am not a 'nimby' but I do ask you to consider pushing back the development and also putting bungalows nearest to us which would greatly reduce the impact. Also this will tie in with your comments about the development being closer to the town for the convenience.. we obviously need more bungalows as we have 40% over of 60's living in our town!!!

e) Finally.. my other major concern was the fact that it was mentioned that some of the new builds would be 1-2 bedroom, this is ridiculous.. we need 2-3 bedroom houses built for the growing families that we need to keep in our town and more to the point encourage to come here. NO MORE big houses of the like that are already built on this Church Meadows estate ..the only people that can afford them are retired and wealthy.
I really hope your take on board my comments, I have lived in Halesworth all my life (51 years), I don’t get involved in the Halesworth Town Council because I would get too animated at some of their ways and might also speak out of turn! However, I am very passionate about my town and I want what’s best for it, I agree it needs to grow but it also needs to retain its quaintness and charm. Banging up a load of houses in the wrong place could end up looking like that awful view when you enter Bungay and look across right from the Swimming Pool! Some planner got that badly wrong!!

Attached documents
Andrew Stewart

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 831

Comment The draft plan contemplates a significant number of houses on this site. It will result in a material increase in population of Halesworth. No development of a site of this size should be permitted unless the Council are sure that (a) there is demand for such a number of dwellings and (b) local infrastructure is improved to support this additional population-including schools, doctors, utilities and roads.

Properties on the market currently seem to stay available for quite some time so I query the potential demand without commensurate job opportunities. Otherwise this could simply increase the average age of the town requiring additional services and health care provision. Smaller developments on existing plots within the current town boundary may therefore be more appropriate.

I’d make the following comments in relation to this site:

* The terrain rises to the West away from the town boundary. This has resulted in drainage issues as surface water drains into properties on Roman Way. Any development must address drainage issues. Developers are usually prepared to give assurances on this but there is almost never any comeback if they fail to comply or cut corners, and with council budgets under pressure enforcement action is unlikely or too late to prevent damage to neighbouring properties.

* Since the terrain rises there is a danger of an ugly and overly dominant urbanisation effect, similar to that on the entry to the town from the Bramfield Road and as seen in Bungay. This will have a negative effect on the landscape in a rural environment. It is suggested that development be restricted to the crest of the rise so that the slopes to the eastern part of the site can be left for landscaping, trees and potentially a play area.

* The population profile suggests that more bungalows should be built as opposed to large houses.
* Roman Way is already quite a busy road at certain times carrying all traffic heading on the road to Chediston and Harleston. Increased traffic will place a particular strain on the junction with London Road where street parking and the flow of vehicles towards the town already make exiting Roman Way difficult and dangerous.

* Unless carefully planned the development will have a significantly negative effect on surrounding properties. Appropriate screening and "air gaps" between new and existing properties should be incorporated in any plans for this site.

Anonymous

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 268

Comment The site WLP4.2 is not a natural progression of the surrounding housing developments at all! The massive height difference between the proposed plot of land and the Dukes Drive homes and Roman Way / Newby Close makes it stand out and overlook unnaturally.

I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

I strongly feel that WLP4.2 should NOT be considered as appropriate land for housing, due to the negative impact on surrounding homes and families.

Building up high on WLP4.2 land would also result in additional strain on the local water table – potentially adding to the yearly issue of flooding in the town.

Attached documents
Barbara Langley

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 278

Comment The plan for a lot of houses at the west end of Chediston Street looks as if it will create bad traffic problems and risk pedestrian safety for those working on the narrow pavements of Chediston St, the pedestrian route to the town centre. That road out to Chediston is very narrow. Could it cope with access to such a large number of houses?
Charlotte Slater

Section  Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID  74

Comment  I wish to feedback regarding the New Waveney Local Plan. Specifically to the plan's proposed development on the land opposite Roman Way / off Chediston Street, in Halesworth. Site WLP4.2

* I fail to see how a development on this piece of land would not "stand out" very unnaturally from the local environment. The land is significantly higher than all of the surrounding housing developments and will visually dominate the local area. The residents living in homes in the cul-de-sac's from the Dukes Drive development; that directly borders the proposed site, will be terribly overlooked and may also suffer from issues with water drainage into their gardens / properties as a consequence of the new / proposed development.

* In addition the homes at the bottom of Roman Way, in particular the 4 homes on Newby Close will be terribly overlooked and overshadowed by a development on this land. This is exacerbated by the significant difference in height between the 4 homes fronting Newby Close and the height of the site of potential development. I note the proposed local plan talks of ensuring property types should not be too high on the edges of the development. I would go further and say the edge of the development overlooking Roman Way should not be built on at all, and the homes be located central to the plot of land, away from both Roman Way and the Dukes Drive homes. One could only hope the height of properties was also a policy that was fully enforced by Waveney District Council. However, I feel it is a contradictory policy having single story homes on a piece of land where you are trying to encourage young working families...as they are unlikely to want a bungalow! Perhaps this plot is not the "ideal site" you think it is!!

* In addition the traffic on Roman Way, at peak times, is busy and often very noisy, with farm traffic; including large cattle trucks rattling down the road before 6am. Any local resident will vouch for this. The potential development will, of course, increase road noise. I can personally say that
at 7am the traffic is heavy and noisy and regularly wakes my child, despite our home having double glazing. Also, road access to the proposed development must have careful consideration and local consultation to reduce potential negative impact on existing homes and families. The junction at the top of Roman Way joining London Road is busy at peak times with farming traffic, HGV’s, as well as general traffic. The junction may therefore also require careful consideration and re-working to accommodate the increase in road traffic that 200+ new homes could bring, potentially 400 more cars? I believe Roman Way / Newby Close residents quality of life would be detrimentally impacted on as a consequence of potentially 400 more cars using the road from the proposed new development.

* The town map from the proposed new Waveney Local Plan shows possible alternative land for development, in Halesworth. I note on 2 of these sites the reasons for not building homes on this land is because it is: "in a prominent location and would have a greater negative effect upon the landscape than some alternative sites." I have to say site number 115 & 116 I feel are exactly the same as WLP4.2 -the land being proposed for homes off Chediston street. In fact, I would say that the land at the end of Chediston street is a site that would have a much greater negative impact on the surrounding landscape in comparison to site 115 & 116 because of his height difference compared to the homes surrounding it. I very strongly feel this and refute the reasons detailed for not building on plots 115 and 116, in the proposed New Waveney Local Plan. I also see no issue with the land on plots 115 & 116 being too far away from the town centre, as most residents on Dukes Drive and Bedingfield Crescent and nearby houses would walk, use their car or the local bus service to get into town, as do the residents of Holton. This is not an issue to prevent homes being built here, in my opinion.

* Using alternative land to the proposed WLP4.2 site would reduce the significant detrimental impact on the residents surrounding the new development, mostly caused by the significant height difference of the land and subsequent overbearing visual presence / being overlooked by a large housing development to a large number of homes and families.

Attached documents
I write in response to the publication of the First Draft of the Waveney Local Plan and the corresponding consultation. This representation is written in support of the draft allocation WLP4.2 (Land adjacent to Chediston Street, Halesworth) for residential development on behalf of Christchurch Property Company Ltd.

An application for residential development on the site has recently been submitted to the Council for consideration. Enclosed with this representation is the illustrative masterplan and Design and Access Statement which were submitted in support of the application showing how residential development on the site could be designed in line with the Council's draft policy. Hard copies of these documents have been provided by post.

This representation is written in support of draft allocation WLP4.2 and demonstrates that the site is suitable, deliverable and available for residential development.

Accessibility

The site comprises 9.17 hectares of agricultural land to the western side of Halesworth and is adjacent to the existing settlement, bounded by development to both the south and east. The supporting text regarding the allocation (pg 102, paras 4.15-4.19) sets out that the site is only 600m from the town centre and confirms that it benefits from good links to services, facilities and employment opportunities.

The nearest bus stops are located to the south east of the Site, in close proximity to Dukes Drive. The bus stops are located approximately 300m from the proposed site access onto Chediston Street. The bus stops in both
directions are served by routes 88 and X88, connecting the Site to Southwold and Norwich, as well as the 925 school service to Bungay High School. Approximately 600 metres from the Site there are bus stops for 60H connecting Halesworth to Beccles. Halesworth Train Station provides further connections to Ipswich and Lowestoft.

In summary, we concur with the Council's conclusion that the site is well located on the edge of the existing settlement and is well connected, as such it represents a sustainable location suitable for residential development.

Food Risk and Drainage

The Environment Agency's indicative floodplain map shows that the site does not lie within a designated fluvial floodplain. The risk of flooding from other sources, such as surface water and groundwater, is considered low.

Any proposals for the development of the site will follow best practice regarding site drainage to ensure that any surface water runoff from the development is managed by attenuation and controlled discharge, to either the river (New Reach) via the surrounding surface water sewer network, or via infiltration directly to ground, which will ensure flood risk is not increased elsewhere. A variety of Sustainable Drainage Systems (SuDS) will be utilised to control surface water flows from the site. All surface water drainage options will take account of local ground conditions and ground levels.

As a result, it is concluded that there is no drainage or flood risk constraints that would prevent the development of the site.

Historic Context

It has been identified that the site has a potential to contain localised archaeological remains. In line with national and local policy, and consultation with Suffolk Archaeological Advisors, all necessary measures will be undertaken to better understand and record any remains at the site which may be of interest.

There are no other historical or conservation designations in the immediate vicinity and therefore no historical or conservation constraints to the development of the site.

Landscape Character and Visibility

The site is situated upon the slightly elevated ground to the south of
Chediston Street and is partially enclosed by existing residential development to the south and east. Relatively open views are available to the north west and west due to a lack of a defined field boundary.

Any development proposals would provide a new vegetated boundary at the western edge of the settlement, and retain and enhance other landscape features to assist in softening views of proposed built form. New housing at the westernmost parts of the site will be avoided to assist in mitigating against potential views of the proposed development through the introduction of new screen planting. Units on the crest of the hill are restricted in height to no more than 1.5 storeys high.

The design would seek to include sensitive landscape and urban design proposals, which will respect and complement the existing character of the town and the local landscape.

The recent planning application for the development of the site includes a Landscape and Visual Impact Assessment, which assisted in the design process for the scheme, especially considering the potential impacts on landscape character and existing views from the town and surrounding countryside. Subject to the sensitive design of the scheme (as set out above) it is not considered that the development of the site is constrained by landscape or visual impact issues.

Ecology

A Preliminary Ecological Appraisal of the site has confirmed it is of generally low wildlife value, with most of it dominated by improved grassland under a grazing regime. The boundary hedgerows have some limited ecological interest, although none of trees contain any features potentially suitable for bats. Nearby ponds have been assessed as having average or below suitability for Great Crested Newts. There are no designated sites adjoining or near the site.

The potential development of the site would provide opportunities for ecological enhancement including green corridors, planting of native trees and shrubs, sowing of species-rich grassland in open spaces, and the erection of bird and bat boxes.

Based on the initial ecological appraisals and surveys of the site it is concluded that the development of the site would not cause significant harm to the existing habitats and assets on or around the site, and would bring opportunities for enhancements, as such ecology is not seen as a
constraint to development of the site.

Policy WLP4.2

The current draft policy identifies that the site could accommodate circa 200 dwellings. It also sets out a series of site specific criteria as follows:

• This site should be developed at a density of approximately 25 dwellings per hectare.

• Development should include provision of an open space of not less than 0.8 hectares in size, including a neighbourhood equipped area play space. The open space should be designed to have a street frontage on three sides or have a street corner position.

• A landscaping scheme will be required to demonstrate how the development will limit the impact on the landscape.

• A Transport Assessment and Travel Plan should be submitted with any planning application.

• A planning condition relating to archaeological investigation will be attached to any planning permission.

These criteria are considered to be deliverable and achievable and will be incorporated into the design of forthcoming development of the site.

Conclusion

This representation is written in support of draft allocation WLP4.2 and demonstrates that the site is suitable, deliverable and available for residential development.

As set out above we would emphasise that site WLP4.2 is a sustainable and deliverable location for residential development. It is evident that the site can be developed in a high quality, sensitive manner and capable of addressing the Council's policy requirements. Crucially the enclosed layout shows how the site can be designed to ensure that development would not be at a high risk of flooding; that the development would not have a detrimental impact upon the ecological assets and valuable habitats to the south of the site and that a design that enhances the settlement edge of Halesworth and positively contributes to landscape character can be readily achieved.

Importantly our involvement in the Local Plan process and support for this allocation demonstrates that the promoter and landowner is willing and
actively participating in the emerging plan and has an intention to see the site developed in the short term. This is further emphasised by the planning application which was recently submitted for residential development on the site. The site can therefore be considered readily available.

In conclusion, we strongly support the inclusion of the site WLP4.2 as a Draft Allocation for residential development in the emerging plan and trust that on this basis it will continue to be included as the plan progresses.

I trust that our comments will be taken into account in progressing the preparation of the local plan and I would be grateful if we could be notified of any further consultations.

ENC 1 - Illustrative Masterplan Ref: YOR.2819_10C

ENC 2 – Design and Access Statement YOR.2819.003.B

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/135089/PDF-/871157%201%202017%20
Craig Lockwood

Section  
Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID  
619

Comment  
WLP4.2

The proposals rightly suggest consideration should be given to the levels of the site due to views from further afield, but I think proposing 1 or 1.5 storey development is unwarranted as Halesworth already has an over provision of this type of accommodation with a large degree of it being converted to provide something more suited to current needs. The positioning of a community sized open space which is well equipped and has a commercial benefit as stated previously would be ideal in this location as it would prevent anti-sociable behaviour with the presence of a small tea room or similar, providing much needed toilet facilities (the town has recently lost this in one location) and would place the new development within the heart of the community although physically on the edge of the settlement. The open space provision should be made bigger than the 0.8 hectares proposed as this is on the edge of the town and the open space could bleed into the countryside, for the open space area to be of worth it should be larger to provide for a variety of uses as usable open space within the town is very limited.

Attached documents
David and Jenny Olds

Section       Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID   644

Comment       With regard to the proposed 200 new homes on land adjacent to Chediston Street, Halesworth, it is a site which does not specify a main access road. Could this be clarified? Living close to Roman Way, and knowing residents there, we are acutely aware of cars driving well above the 30mph towards the junction with the T-Junction with the London/Walpole Rd. Extra traffic will only acerbate this problem.

Attached documents
Halesworth Town Council N Rees

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 1352

Comment This development is upstream of the narrow bridge in The Thoroughfare. Heavy rainfall results in flood water backing-up and flooding the lower levels of the town. The surface water run-off from the hard surfaces of this development needs to be disposed of before any surface water reaches the river up-stream of the bridge. It would be beneficial if the developer provided indemnity against flooding which is bound to happen if significant measures are not taken at the start of construction.

The positioning of the main site access at the NE corner of the site will encourage car drivers to use Chediston Street as their return route. Chediston Street is a narrow street within the Conservation Area. Resident’s cars are parked along the street narrowing the road space further (few houses have off-street parking). It would be beneficial if the main access was moved up towards the SE corner of the site to encourage drivers to use the wider main road off London Road.

Attached documents
Harry Knox

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 331

Comment I would just like to make a couple of points.

First I think that the site on roman way and Chediston street is most unsuitable as it will tower above existing housing. Also to put a roundabout on this corner will be very intrusive to existing residents increasing traffic noise and pollution.

Secondly the surface water run off will increase and make the flooding in the town and land around the millennium green. At more risk as we know from the other week when the thoroughfare and the millennium green had raw sewage flowing through.

Thirdly the traffic buildup in the morning at the top of roman way will cause noise and pollution to existing residents and old peoples apartments at the limes.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 1577

Comment Hopkins Homes' site at Land West of Norwich Road (Site No. 122) comprises 4.92ha of land split into two adjacent parcels. The larger, eastern parcel extends to 3.37ha of cultivated arable farmland, whilst the western parcel, covering an area of approximately 1.55ha, is undeveloped grassland with overgrowth and scrub delineating the periphery. The site adjoins the settlement boundary of Halesworth on three sides to the north, east and south (see Location Plan at Appendix A and First Draft Plan settlement boundary map below) and to the west it is bordered by a railway line, beyond which is open countryside. To the north of the site is Broadway Drive Industrial Estate, to the east are properties fronting Norwich Road and to the south are properties fronting Old Station Road and an existing park and play area.

A Feasibility Sketch for the site has been produced (See Appendix B) which demonstrates its ability to accommodate the residential development proposed. Safe vehicular and pedestrian access into the site can be achieved from Norwich Road and a second pedestrian access would be provided through the existing public open space to the south of the site onto Old Station Road. The site is well related to the built-up area of the town and is just 900m walk from the town centre, 600m from Edgar Sewter Primary School and 250m walk from the proposed community, sports and education facilities at the Halesworth / Holton Healthy Neighbourhood (Policy WLP4.1)

The site is identified as suitable for residential development in the Strategic Housing and Employment Land Availability Assessment (SHELAA, July 2017) and Appendix 5 – Alternative Sites of the First Draft Plan makes it clear that the only reason the site hasn’t been proposed as a housing allocation is that the site is considered less favourable to the other preferred sites in Halesworth and Holton "which are either closer to the town centre, have
more benign impacts or deliver wider benefits”.

In the context of the additional housing requirement that will clearly need to be accommodated in Halesworth, we consider the site to be an eminently sensible and sustainable option to deliver new homes and request that it is allocated accordingly.

It is also unclear from the site assessments in the SHELAA why the site has not been allocated already above Policy WLP4.2 which is in a highly prominent landscape location to the southwest of the town. Both sites are assessed in the SHELAA as amber for Landscape / Townscape impact. This is despite the fact that Policy WLP4.2 extends some distance into the open countryside and is located on highly visible rising ground, whereas Land West of Norwich Road is enclosed on three sides by the urban area on a fourth side by a railway line. It should be clear therefore that the proposed site would have next to no landscape impact as it would essentially comprise infill development, whereas Policy WLP4.2 comprises an urban extension into a sensitive landscape environment. The two photos below show the most prominent views of each site from publicly accessible points within the urban area and clearly demonstrate the different landscape character of each site.

Site 122 is also located on the side of Halesworth that is the focus of recent planning consents and allocations and that is clearly considered to be the most sustainable direction for future growth. The SHELAA has also not taken into account the fact that Policy WLP4.2 is partly Grade 2 (i.e. Very Good) agricultural land that is in current agricultural use, whereas Site 122 is Grade 3 (i.e. Good to Moderate) agricultural land that is only partly in use. NPPF Paragraph 112 is clear in this regard that "Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”. It is clear therefore that Site 122 should be considered the more sustainable option for development above Policy WLP4.2.

Hopkins Homes are a local house builder and they recently achieved a resolution to grant planning permission (subject to finalising a S106 agreement) for 160 dwellings at Land North and East of Hill Farm, Halesworth (Ref: DC/16/5410/OUT & DC/16/5411/OUT). This resolution was passed on the basis that the Council needed a demonstrably deliverable supply of housing sites for the new Local Plan. Hopkins Homes understand the local context of the town and consider their site to be a uniquely sustainable and deliverable option to provide the additional
housing requirements that we consider should be accommodated in the town.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135850/PJP-/8737621%201%20Figure1FirstDraftPlanSettlementBoundariesMapjpg.jpg

http://consult.waveney.gov.uk/gf2.ti/af/799778/135851/PJP-/8737621%201%20Figure2ViewtowardsSite122fromOldStationRoadthroug
hexist
Jan Athis

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<tr>
<th>Section</th>
<th>Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth</th>
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<tr>
<td>Comment ID</td>
<td>275</td>
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<tr>
<td>Comment</td>
<td>Extremely concerned that infrastructure is not created before or at same time as housing stock. I understand temporary buildings will be used for school etc. Roman Way B1123 already carries lot of large vehicles inc agricultural / livestock transport. Additional 400 cars (for 200 houses) would be disastrous!</td>
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Attached documents
Joanna Barfield

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 304

Comment Very small lane leading into Halesworth from this direction and then potential residents only have one way into town via Roman Way. Junction at bottom of Roman Way will become very congested. Valley opposite liable to flooding. Will lots of new houses add to this?

Attached documents
Josephine Lawes

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 432

Comment I am totally against this proposed development as it directly overlooks the entire side boundary and back of my property and if this proposed development goes ahead (especially if houses are built) they will completely overlook my property and give me a total lack of privacy which I have enjoyed for the last 33 years and the reason I moved here in the first place. The proposed development area also stands higher than my property which leads to a concern of flooding. If the development goes ahead this is likely to result in a considerable reduction in the resale value of my property as I currently enjoy uninterrupted views of the countryside and which I would subsequently lose. I am also concerned that the local infrastructure of water/sewerage/drainage facilities, road system, parking within the town, doctor’s surgery and educational establishments are totally inadequate to take the large proposed increase.

It is my understanding that part of the proposed development area has previously been used for waste disposal in the past which puts this as unsuitable for building over?

18/09/2017:

I have already submitted my comments on the above proposed development of 200 properties on the neighbouring field which runs alongside my property boundary. I now attach two photographs taken over my fence which clearly shows the height of the proposed area. These photographs demonstrate quite clearly the height at which any residential dwellings would be erected and even at single storey height at the top of the hill, would still be considerably higher than my property and boundary fence and overshadow and severely compromise my privacy due to the close proximity.

Attached documents http://consult.waveney.gov.uk/gf2.ti/af/799778/135279/PJP/-
Ken and Jan Derham

Section  
Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 
767

Comment  
As residents of Roman Way, Halesworth, our principal concern about the proposed development of 200 new homes adjacent to Chediston St, WLP4.2, is the question of access.

Chediston St itself is one-way in the direction from central Halesworth towards the proposed new development. It is unlikely that it would be suitable to make it two-way or to reverse the direction of flow as that would cause other problems.

It is unlikely that many of the residents of the new site would leave their homes by driving away from Halesworth towards Chediston.

The great majority of the proposed 200 residents, perhaps 300 car users, would leave their homes each day by driving up Roman Way into London Road.

The junction of Roman Way and London Rd gets busy at certain times of day. Sometimes entering London Rd from Roman Way can take several minutes for a break in the traffic on London Road. At busy times, especially in the morning when going to work and school, it is likely that long tailbacks would occur in Roman Way, leading to frustration as there is no other way of getting into London Rd and further destinations.

Although traffic in Roman Way is not currently excessively heavy, it does include a considerable amount of agricultural use, with large implements moving slowly, and also several lorries entering Halesworth from the...
direction of Harleston via Metfield and Chediston.

To alleviate the problem of some 500 people leaving the proposed 200 new homes each day with only one viable exit route, we propose that a road from the site of WLP4.2 be constructed to the west of Dukes Drive to provide independent access to Walpole Road in the area where the proposed housing option 115 was considered.

Failing that, a new roundabout at the junction of Roman Way and London Road would be essential, possibly being incorporated into the present roundabout junction between London Road and Saxons Way.

Attached documents
Ken Derham

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 274

Comment My concerns are about the proposed Chediston Street development.

I live in Roman Way. Traffic flow is increasing all the time. In the summer it is a route for large agricultural equipment. Concerns re increase in traffic, junction with Chediston St and London Rd. Particular concern level of additional transport and safety.

What about drainage?

The number of dwellings 200 seems high?

Attached documents
L Graham

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 1218

Comment

On 21st February, Richard Brown Planning and Christchurch Property Company Ltd hired the Rifle Hall, Halesworth in order to host a 'show and tell' regarding proposed site WLP4.2. From attending this and speaking to those involved, I feel there are two further important points to be considered here:-

1) The impact of volume of traffic on Chediston Street.

Chediston Street is a narrow one-way street leading to Roman Way. According the proposed plans by Richard Brown and Christchurch on show at the Rifle Hall on 21 Feb, a new roundabout would be constructed at the junction of Chediston Street and Roman Way for the new estate. (It is interesting to note that the entrance for a new road was constructed years ago by the current owner of the land giving access to the proposed site from Roman Way about a third of the way up from Chediston Street).

Chediston Street has long term existing traffic problems: because of the number of vehicles parked there and because it is so narrow, (especially from around no 57 Chediston Street onwards towards Roman Way). The result of this is that large lorries which travel down the street often struggle and sometimes get blocked or cause damage to properties. The struggle or blockage causes traffic queues behind and congestion.

If 200 new family homes are to be built upon site WLP4-2, let us suppose that each home will have at least one vehicle per household. With the attraction of a new roundabout at the bottom of Chediston Street giving access to the new housing development, this will potentially add, at least, a further 200 new household vehicles to traffic travelling down Chediston Street, plus service vehicles, delivery vans, visitors' vehicles. It could be argued that these vehicles will use another route, but if so, why has Richard Brown's and Christchurch Development's scheme specifically proposed to site a roundabout here as per notices/displays in Rifle Hall on 21 Feb?
2) Impact upon the Halesworth Doctors Surgery

Richard Brown, himself, from Richard Brown Planning was in attendance at the 'show and tell' at the Rifle Hall on 21st Feb. He was questioned re residents' concerns regarding the huge impact of 200 new family homes on the already stressed Halesworth Doctors Surgery based at Cutlers Hill. Based on the average family size of 2 parents plus 2 children, 200 new family homes on site WLP4.2 would add an extra 800 patients to the surgery's patient list. Richard Brown's response to this concern was, "This is a problem for the NHS, not us." His lack of concern is understandable - he lives in Burnham, Buckinghamshire, Christchurch Properties is based in Ipswich. There are 47 Waveney District Councillors, 13 of whom sit on the Planning Committee - yet not one of these councillors lives in central Halesworth.

The fact is, current residents needing to see their GP will be severely impacted by the potential influx of 800 new patients. When booking an appointment with a GP, the wait time is already at least 2 weeks. Richard Brown may say this is a problem for the NHS, but as everyone knows, the NHS is already stretched beyond critical point, so actually, it becomes a problem for the residents of Halesworth.

It seems that when it comes to matters of health versus wealth, wealth is in danger of becoming more important than health: income for Richard Brown, income for Christchurch Property Company, income for the current owner of the WLP4.2 site, income for Waveney District Council via increased council tax revenue; whilst for health: the current residents of Halesworth, plus 800 new ones, will struggle even more to get a timely appointment with their GP.

Has anyone thought to consult the Cutlers Hill Practise Manager about this, or are the health care provisions for your residents really that far down the agenda?

Attached documents
Liz & Ken Lobacz

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 345

Comment How will the Council ensure that there will be adequate green screening around the Roman Way side, so that this area still looks rural.

How will the Council ensure any special habitats are maintained. We cannot keep using up land and not sharing it adequately with the wildlife. This particular field has a large quantity of brown hare – where will they go?

On the whole it is sad to see this field lost to housing, but we do see very much the need to provide housing for local people.

Attached documents
Michael Fagg

**Section**  
Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

**Comment ID**  
190

**Comment**  
Re Site WLP4.2 off Roman Way Halesworth. The planners have issued the invitation to suggest what may be a more suitable site. This would have been done earlier in the Local Plan Process, but this site was not in the previous consultation (2016) suggested allocations.

Site 013, the Fairview Farm site, on the Norwich Road, is being put forward here as a more suitable site.

First to deal with the three main reasons given in the proposed Local Plan for discounting the Site 013:

* "Residential development in this location would result in an unnatural extension to the residential part of the town and could conflict with adjacent industrial uses."

The Fairview Farm site would not be an unnatural extension to the residential part of the town – there are already houses (and a new-build under construction) on this stretch of the Norwich Road, unlike Chediston Street where there are no homes beyond Roman Way. There is also already a housing estate for 22 houses currently being built immediately to the south on Fairview Road/Norwich Road that presumably Planning have not regarded as in "conflict with adjacent industrial uses" which are directly opposite,

2. "Development would also have the potential to impact upon the setting of a listed building and impact upon biodiversity."

The impact on the listed building "cannot at this stage be ascertained" and the biodiversity is noted as a minor negative. The draft Strategic Housing and Economic Land Availability Assessment did not identify any constraints that cannot be mitigated.

* "Alternative sites in Halesworth are more accessible to town centre services and facilities."
Presumably this is partly in reference to the site off Roman Way, Site WLP4.2, which is not nearer the town services and facilities, though it may be nearer some of the town centre shops. Fairview Farm is closer to the Surgery, the Primary School, the Station and the Health and Sports facilities, proposed for the Site WLP4.1, are just a stone's throw away to the south. There is a cycle path practically all the way to the Primary School and the site is directly on the Bus route to the High School in Bungay. The site is also closer to, in fact is on the doorstep, of the industrial and commercial estates on the Norwich Road giving rise to employment opportunities.

Housing on Fairview Farm, being nearer to potential sport facilities and the industrial sites for employment, "will help attract younger, working age, people to the town and provide more balance to the demographics of the population" and as such would satisfy the local plan strategy for the town which Site WLP4.2 does not. In addition there is potential on the site for some industrial development.

The site is only 15 minutes away from the Fitness and Swimming Pool facilities in Bungay (this compares to 25 minutes from Roman Way) and it is more convenient for shopping in the larger town of Beccles.

Other points to take into consideration in preferring site 013 would be that

* Site WLP4.2 is the only site in Halesworth with a Red archaeological alert;

* there is also a historical town dump on the south of the site with possible contamination to deal with;

* there would be Highways issues with regard to accessing and leaving the site on Roman Way (possibly with a new roundabout) and with regard to increased traffic where Dukes Drive meets London Road – already a problematic junction at busy times. Fairview Farm on the other hand could be accessed by vehicles (and by building contractors) from Sparrowhawk Road with no Highways issues;

* there is a flooding concern that there will be a greater risk of pluvial flooding as a result of surface run off from the WLP4.2 site as it will drain into the Blyth tributary which is the main cause of flooding in the town; the surface water sewer network in this area already fails to cope in severe storm conditions and on a large site such as this the loss of drainage to ground infiltration will be significant. Hopkins Homes were required to build a holding reservoir on the flood plain to try to alleviate this in 2001 but to little effect;
* the Roman Way site is "a large site and would be visible from a considerable distance, which has the potential to harm the wider landscape and the urban fringe." (Landscape Sensitivity Study) The Fairview Farm site on the other hand "is not particularly visible because it is fairly flat and overgrown so it makes only a limited contribution to the landscape." (Summary of Draft Strategic Housing and Economic Land Availability Assessment);

* there must be some concern from the costs incurred by some of the above issues, together with the community infrastructure levy for this site, that the developer may reneg on any affordable housing commitments made as the site becomes more and more expensive to develop;

* Roman Way is a strong and obvious settlement boundary for the west of Halesworth beyond which there is nothing to stop urban sprawl continuing. Sparrowhawk Road to the north could provide a similar permanent settlement boundary and would match the industrial boundary on the other side of the Norwich Road. It seems important to keep, as far as possible, the integrity of Halesworth as a defined market town intact – this is already to some extent lost in the merging of Halesworth and Holton to the east.

Michael Fagg

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 847

Comment The Site WLP4.2 (off Roman Way, Halesworth) should not be included in the First Draft Plan as a preferred site for six important planning reasons:

1. There has not been adequate public consultation with regard to this site.
2. The site is outside the settlement boundary and a Greenfield site.
3. It is regarded as having "high Landscape Sensitivity."
4. It does not concur with the strategy proposal for development in Halesworth.
5. It is not necessary at this stage to give a green light to such a development.
6. Other sites, not allocated, may be preferable.

1. Lack of Public Consultation

This site was not included in the consultation in 2016. (The very much smaller site 163 was regarded to be too small on its own to be viable.) The site first appears as an 'additional site' (203) in an appendix to consultation responses dated August 2016 – this is two months after the close of the Consultation in June of that year.

The site appears to have been added to the site allocations by the planners after a member of the public, (who in responding to site 163), drew attention to "a large piece of land directly to the west and arguing that it would be a good location for future housing development" adding "that it would be inconspicuous in the landscape". This late allocation, especially as it is such a large site and has been given 'preferred status' without any consultation, has unfortunately elicited the following rather lengthy response.

2. Land is outside the Settlement Boundary and a Greenfield Site
Policy WLP1.3 - Settlement Boundaries: Land which is outside of settlement boundaries is considered as the Countryside. New residential development will not be permitted in the Countryside except where specific Policies in this Local Plan indicate otherwise.

The New Waveney Draft Local plan has a photograph of a 'settlement boundary' presumably as a good example to demonstrate the point. The photograph is of Roman Way opposite this proposed development. There are no 'exception site policies' in the Local Plan with regard to Halesworth. Any policy that Greenfield sites may be needed to fulfil the local plan housing quotas is too vague to constitute a 'specific policy' and so on these grounds this site as a large new residential development should not be permitted.

Greenfield sites should be protected where possible from development. Though Government has relaxed its attitude to this, this is to provide for a National shortage of housing. But the mood in government in April last year prompted MPs on the Communities and Local Government Select Committee to say that 'ministers should consider giving local authorities the power to block developments on greenfield sites if brownfield land is unused by developers.' Badger Homes controls HAL4 off Saxons Way, a brownfield site ideal for affordable housing, close to the centre for amenities and with local transport readily available. HAL4 should be developed before giving the green light to sites such as that off Roman Way (very difficult to refuse planning once it is in the Local Plan).

3. Landscape Sensitivity.

The Landscape Sensitivity Study identifies this site as "being located within an area with high landscape sensitivity," and "is a very open landscape with long site lines, which contributes to its sensitivity. Site 203 is a large site and would be visible from a considerable distance, which has the potential to harm the wider landscape and the urban fringe."

This issue has not been properly addressed: the suggestion that "It may be necessary to restrict building heights to 1 or 1.5 storeys on the crest of the hill." cannot be regarded as a serious response to 'landscape sensitivity' given that this site will sprawl along a quarter of a mile of hillside adjacent to this tributary valley of the Blyth. Two other sites to the south of this one with the same "prominence" in the landscape were deemed not suitable to be included in the plan due to having a "greater negative effect upon the landscape than some alternative sites." This must also apply to this site WLP4.2
4. Proposed Strategy for Halesworth

"The strategy for Halesworth and Holton is to increase the level of housing within the town which will help deliver enhanced health and sports facilities and new employment opportunities. This will help attract younger, working age, people to the town and provide more balance to the demographics of the population."

Site WLP4.2 is purely a housing proposal with no suggestion of enhancing health and sports facilities etc. Indeed the opposite is true: the expected demographic for this site must be similar to the Hopkins Home development of 2001 the other side of Roman Way in which, according to the census of 2011, about 60% of inhabitants are over 60 years old. The 'median age' for this area is 64. Given the prices that these homes command, they have not attracted 'younger, working age people' (only 12% are aged 25 to 45), but are occupied mainly by those who have retired, many coming from cities like London. This simply puts added strain on the Doctors Surgery and Care in the Community. Housing by itself only produces very limited employment opportunities. Other sites could well attract a younger demographic. (See 'Other preferential sites' below)

5. The "need" for this particular development.

The need for this development seems to be solely to provide the increase in housing to meet the planning target of 8% for Halesworth. There is a timescale, finishing in 2036, (in nearly 20 years time!) for this quota to be fulfilled. Again there should be no rush to give a site like WLP4.2 the 'green light'. It would be much better to have in place the facilities (both sport and health) that are proposed for the Site WLP4.1 north of the town before committing to further housing stock just to tick a numerical box. These facilities take time to develop and it would be a mistake to further overload the Surgery and 'Care in the Community' by prematurely building more houses for elderly people, many of whom may not even come from this area.

6. Other sites could be more preferential

Regarding other proposed sites, often the reason given for not choosing a site is because the 'preferred sites' are closer to the town centre services and facilities. WLP4.2 is relatively closer to the shops, but all the sites to the north of the town (even the Fairview Farm Site up towards Sparrowhawk Road) are closer to the surgery, the station, the primary school, the Cut Arts Centre, the industrial areas, and the proposed sport and health facilities earmarked for development on WLP4.1 Many of these sites to the north
would for this reason attract a younger age group who want to engage in sport and take advantage of the employment and other facilities nearby such as the station (useful for employment outside the town). This being the case, these sites would fit much better with the strategy for the town to try and balance the demography away from the elderly.

Once it was (maybe wrongly?) decided that WLP4.2 is preferable just for being nearer the town centre itself, then another site has often been rejected on the grounds of being less suitable because "the preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. In this context, the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan." Is this not giving a further reason for rejecting sites just because others have already been 'preferred' and not a reason relevant to the site itself?

In the light of the proximity of other suggested sites to the facilities mentioned above, a shift in what is regarded as the ‘town centre’ for such facilities (other than shopping, much of which is done by car anyway at the supermarket) means these sites should be revisited and reassessed. However, given the late stage in the development of the New Local Plan, the simplest way forward would be to drop the Site WLP4.2 from the plan and revisit it, along with all the other suggested sites, in five years time (or for the next Local Plan) and with proper consultation.

From Department for Communities and Local Government last updated 28th July 2017: Planning practice guidance.

Though the Local Plan under this National Guidance "should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered," this can be done not just by "specific allocations of land" but can be "through criteria-based policies to be taken into account when considering development " The Guidance also states "Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required". Given that under discussion here is the need for housing more suited (in this case by location) to a younger demographic which is the main strategic aim for the town, then the following Guidance could be followed: "Where local planning authorities do not consider it appropriate to allocate such sites, they should ensure that there are sufficiently robust criteria in place to set out when such homes will be permitted. This might be supplemented by setting appropriate targets for the number of these homes to be built". This
would satisfy the long term 8% housing target set for Halesworth by 2036 without being 'site specific' at this stage.

Conclusion:

Any one of the above reasons could be used for not including site WLP4.2 in the Local Plan. Taken together they constitute a powerful argument to re-think the inclusion of it as a preferred site adding two hundred homes to the housing stock in the immediate future. This would go some way to alleviate local fears (expressed in the Town Forum on September 14th) that well over a thousand new residents for Halesworth proposed in the Plan is too many too soon and would put an intolerable strain on local services which are already at breaking point.

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/134792/DOCX/-/8687701%201%20Site%20WLP42docx.docx
Mrs J Lawes & Mr P Fisk Fisk

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 277

Comment This proposed development runs parallel to our property. Due to the height of the field we will be severely overlooked and will completely lose our privacy. We are strongly opposed to this development. We have enjoyed privacy and uninterrupted views of the countryside for the last 33 years – the reason we moved here. We feel this development will devalue our property by a significant amount. Concerns over run off of water, inability of the local infrastructure to cope as well as concerns over traffic congestion and noise.

Attached documents
Paul Bethell

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 983

Comment I am writing to you in connection with the WLP4.2 Land adjacent to Chediston Street proposal.

I own a property at the eastern boundary of the area in Roman Way, and currently my neighbours and I have uninterrupted views of the field where the development is proposed, so 200 dwellings would have an impact both visually and financially on the current market values of the properties. As the area is currently a private arable farm with no public footpath access, there are no privacy problems. If house are built adjacent to our fence this will impact on the open view. With an open common area, anyone could approach right up to our boundary and look into our houses. A footpath close by or an access road to the new development would be intrusive as well. What about fly tipping?

200 houses would mean at least 200 extra cars. How would the local roads cope? Going by the developer's plans displayed in the local hall earlier this year, you would need a mini roundabout at the junction of Chediston Street and Roman Way. The bulk of that traffic would have to proceed up Roman Way, as this is the way to the A12, A145, Ipswich, Beccles, Bungay, Southwold, the only big local supermarket, petrol stations, medical services, etc. No doubt some drivers will be heading for Chediston, Laxfield, etc, but not too many. Chediston Street the other way is one way. I would presume some traffic lights will also be needed at the junction of Roman Way and London Road to cope with this volume. Think of the impact that will have on local traffic flow. Think of the impact it will have on air quality and the subsequent impact on pedestrians - especially children making their way to school. Or people simply walking up the road to access public transport or the local supermarket. You will also have to provide proper zebra crossings. It will also expose the residents of Roman Way and the adjacent area to increased noise levels.

Light pollution is another problem and not only for the current residents. Think of the effect on the local bird population (not that they can vote),
especially the swallows who display in the evenings above the River Blyth. There will also be affect on other wildlife. 200 houses will mean a lot of domestic cats. Think of how many birds and small mammals will die. I’ve seen hawks and an owl hovering and swooping over the field, so there are small rodents in the area. And butterflies. No doubt nothing on the endangered list, but any development will have an impact on biodiversity, and that includes the wild flowers. We have lots of grass, concrete and tarmac already and they don’t encourage diverse life.

What about other infrastructure such as water and sewage, an already strained local health service, school places? Can Local Government finance the extra services that will be needed?

I also believe that some of the spoil from the current estate built by Hopkins Homes was dumped on the proposed site when it was landscaped, so is it stable?

Attached documents
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<thead>
<tr>
<th>Section</th>
<th>Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth</th>
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</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>628</td>
</tr>
<tr>
<td>Comment</td>
<td>Proposals for up to 200 properties on one site are ridiculous. Far too many. Obvious problems with parking and environmental issues.</td>
</tr>
</tbody>
</table>

Attached documents
**Suffolk County Council Robert Feakes**

**Section**  Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

**Comment ID**  1717

**Comment**  Main access from new improved Roman Way/Chediston Street junction  
Plus sustainable links to existing ped/cycle network  
Transport Assessment required

**Attached documents**
Suffolk County Council Robert Feakes

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 1648

Comment Policy 5 of the Minerals Core Strategy safeguards sand and gravel resources identified using data available from the British Geological Survey. The County Council will safeguard any site within the identified minerals consultation area from proposed development in excess of one hectare or areas falling within 250m of sites within the Specific Site Allocation DPD. The following allocations are larger than one hectare and within the consultation area, however this is no reason to prevent the allocation of these sites as the County Council believes it to be unlikely that these sites would be exploited for minerals. The County Council will still need to be consulted as the minerals planning authority if planning applications do come forward on these sites, and would request consideration is given to using some of the on-site mineral resource in any resulting development, to reduce the amount of material transported on and off the site.

- Housing Allocation Policy WLP4.2

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Policy WLP4.2 - Land Adjacent to Chediston Street, Halesworth

Comment ID 1141

Comment This site has good infrastructure along Roman Way, easy access to the Town centre and would seem to be a natural addition to the current, well planned development west of the Town. However careful house-design and landscaping must be shown and adhered to at the planning application stage to limit the impact on the landscape.

We agree the density as recommended in P WLP4.2 should not be relaxed (25 per hectare).

Surface water run-off will need to be addressed as the land slopes west towards Chediston Street.

Attached documents
Policy WLP4.3 Land North of Old Station Road, Halesworth

S M Marlow

Section  Policy WLP4.3 Land North of Old Station Road, Halesworth

Comment ID  285

Comment  Because of lorry depot on Wash Lane – off Wissett Road – the latter is already heavily used. There is a school on Wissett Road (Edgar Sewter) and the traffic already goes excessively fast down the hill just past the school. And the intersection of Wissett Road and Bungay (Norwich) Road is so narrow that currently traffic is regularly held up. Due to the flood plain on the south side of Wissett Road, more housing will exacerbate the already tenuous water build up.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.3 Land North of Old Station Road, Halesworth

Comment ID 1718

Comment No more than 10 dwellings should be accessed via Old Station Rd. Link footways into site

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.3 Land North of Old Station Road, Halesworth

Comment ID 1677

Comment Sensitive watercourse to the north of the site, if discharging via this means we would expect betterment on pre-developed run off rates

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Policy WLP4.3 Land North of Old Station Road, Halesworth

Comment ID 1142

Comment We support the policy at this location provided. However further housing development would create a serious problem at the junction of Wissett Road and Norwich Road, already a ‘pinch point’ in the infrastructure of Halesworth and with the increased danger and increased traffic bordering the Edgar Sewter School.

Attached documents
Policy WLP4.4 Land West of Lodge Road, Holton

Fern Pretty

Section Policy WLP4.4 Land West of Lodge Road, Holton

Comment ID 321

Comment

I've just seen a flyer about the proposal of 15 new houses being built right behind the 8 houses which have just built and been occupied for less then a year. As a resident of one of those houses I'm not opposed to new houses being built in Holton but the proximity to my house I'm not too happy with especially since I will have to live with a building site outside the back of my house for at least a year.. more then likely longer and with a small child will be unbearable. I would like to say for that reason I'm not interested in these new proposed houses being built.

Is there any thought to the existing houses re building site outside there homes at very close proximity?

Schools especially primary as they are both going to become extremely full in the next few years and I am concerned for my sons education if classes are schools are going to be completely overcrowded.

When we bought our property we were told nothing about these proposals and find it quite disgusting that we can be so misled into buying somewhere quiet to then having not only builders for over a year but then 30+ extra people outside the back of my house and who will no doubt be able to see into my house and garden!

What about water run off as this year has shown we have had torrential rain and as I live at the bottom of the hill if houses and tarmac are there instead of trees where will be water go – probably my house & garden!

I understand the need for new houses but to propose a plot so close to homes is ridiculous and where there is not enough space in the primary schools for more children and not enough infrastructure as a whole.

1 supermarket which is expensive and nothing for children to do and then for more people to come into the town – what is everyone going to do in
there spare time?

Attached documents
Mrs Mai and Mr Thomas Shiers

Section Policy WLP4.4 Land West of Lodge Road, Holton

Comment ID 701

Comment Preferred site of development WLP4.4 is directly behind my close (Pine Tree Close, Holton). My husband and I are concerned about this proposed development due to the following:

- Loss of privacy due to the proposed development overlooking our house and garden due to the gradient and slope of the proposed development site.

- Loss of outlook to the detriment of residential amenity – causing current close and property to feel and become enclosed.

- Highway issues: traffic generation into the close and vehicular access right next to our property. Also over-looking our house and garden causing loss of privacy.

- Noise disturbance due to the 15 proposed dwellings behind our property.

- Smells and fumes created by traffic generation and vehicular access next to our property.

- Capacity of physical infrastructure, drainage and water systems.

- Deficiencies in social facilities and infrastructure in both Holton and Halesworth – school places, GP access

- We are unsure why the alternative site 087 Land on Bungay Road, Holton has been discounted as this site is as well located if not better located to shops, services and employment. Additionally this development site would have less impact on existing development and residential areas due to its location.

When we purchased our house in December 2016, we were not advised of the proposed development directly behind our house and this would have been a key factor in our decision to purchase our property. We did not wish to live in a large residential development and chose the property in part
due to outlook and non enclosed nature of the development which will be lost with the new proposed development.

Attached documents
Richard Pymar

Section  Policy WLP4.4 Land West of Lodge Road, Holton

Comment ID  97

Comment  Bungay road just recently flooded. More housing will make this worse. We live in Lodge Road (St Peters Path) and obtained my property because we loved the unspoilt view. This development will have an effect on the value of all properties facing this development. We will leave this village if this development goes ahead. I am not a NIMBY, but I am sure certain individuals who have a vested interest in this development, would not like it in view of their properties. I would also like to add that the two "mansions" in the last building "episode" are still empty.

The last company that built the homes caused complete havoc in our road (ie: parking on pavements, long delays caused by traffic management, etc etc)

Finally, we have very few amenities in this village and a Doctors surgery "creaking at the seams"

Attached documents
Suffolk County Council Robert Feakes

Section  
Policy WLP4.4 Land West of Lodge Road, Holton

Comment ID  1719

Comment  No comments

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.4 Land West of Lodge Road, Holton

Comment ID 1678

Comment No evident discharge strategy for the site. Soil conditions are marginal for infiltration, no watercourses, no AW surface water system

Attached documents
**Policy WLP4.5 - Broadway Farm, Halesworth**

**Halesworth Town Council N Rees**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP4.5 - Broadway Farm, Halesworth</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1353</td>
</tr>
<tr>
<td>Comment</td>
<td>A lane separate from motorised traffic from the centre of Halesworth to this proposed industrial site is essential to provide a safe passage for cyclists and pedestrians. It will also improve the accessibility of the town centre for those residents from the Fairview and Harrisons Lane developments wishing to walk or cycle rather than drive into town. Policy WLP4.5 the proposed access improvement to Broadway Farm only permits a limited development of this site If the demographic imbalance is to be corrected, then a major development of the Sparrowhawk Road roundabout is required so as to enable a significant increase in the size of the planned industrial site.</td>
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</tbody>
</table>

**Attached documents**
MDPC Ltd Malcolm Dixon

Section Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID 1159

Comment WLP4.5

1.0 Background

* Under the adopted Local Plan the site referred to above was included as part of a larger area identified as HAL2 also as an allocation for Employment use (Site Specific Allocations DPD Jan 2011)

* To date the site remains undeveloped and despite a buoyant market elsewhere in the town, it is likely that this stagnation is the result of a lack of viability due to the prohibitive set up costs involved in establishing infrastructure and services, combined with other site specific requirements i.e.:

Policy HAL2

* Land at Broadway Farm, Halesworth, (9.63ha), is allocated for industrial use. The site will be developed in accordance with the following site specific criteria:

  * the site could accommodate a single occupier or a mix of small, medium or large scale B1 (light industrial/business), B2 (general industrial), or B8 (storage and distribution uses). • One point of access should be provided onto the roundabout that links the A144 with Sparrowhawk Road.

  * Significant remodelling to the roundabout between Sparrowhawk Road and the A144 is required to provide adequate access.

  * Street lighting must be provided over the site frontage.

  * Provision should be made for cycle and pedestrian access to and from this site and in particular to link with the National Cycle Network route 1 southwards along the Norwich Road corridor. A financial contribution should be made to assist in the delivery of part of this route.
* A structural landscaping scheme will be required, with early implementation to limit visual impact on the surrounding countryside. This should include the retention of existing trees and hedges.

* Before development is permitted, a further survey of this site should be carried out to

* check for the presence of great crested newts and other wildlife.

* The farm buildings should be subject to historic building recording prior to development that may affect them being permitted.

* An archaeological evaluation should be undertaken prior to development being permitted to allow for the presence in situ of any sites of national importance to be investigated.

* A Flood Risk Assessment should be prepared as part of the application process to assess and mitigate the risk of flooding from surface water drainage.

2.0 Present Position

* Part of the site remains in the FDLP and therefore it is considered that the location is sustainable, but the restricted site still requires investment to establish infrastructure and services. Furthermore being a smaller site then viability must be more of an issue based on the principle of "economies of scale".

* It appears that without any justification or explanation the site has been reduced which appears somewhat perverse given that Halesworth is expected to accommodate over 450 additional dwellings but additional employment land is significantly reduced; exacerbated by the fact that there is a 132KV electricity line traversing the site thus restricting the developable area.

* It would be appreciated if the LPA can give an explanation with regard to this apparent anomaly ?(particularly given that in the Strategy for Halesworth and Holton as referred to in the summary of the FDLPD it offers the following commitment:

"--- and new employment opportunities"

* It is clear that given the history of the site since 2011, whether or not the site is reduced it is unlikely to attract investment without some imaginative thinking.
* With this in mind it is requested that the overall site HAL2 is reinstated in its entirety within the FDLP for employment use but including a "high value retail" offer along the frontage incl. a supermarket and perhaps a fast food outlet to provide the investment to create the conditions to enable more traditional employment uses behind in what is after all a sustainable location.

* A sketch Master Plan is attached to illustrate how this could be achieved including conventional industrial units, starter units and office accommodation. The overall mix will contribute fully to the council’s strategic commitment to achieve "new employment opportunities".

3.0 Other Considerations

* Allocating only the front of the site the present residential occupier would become enclosed in an industrial estate, something that would be totally unacceptable.

* Retail frontage in the form of a supermarket and possibly a fast food outlet would assist in allowing the present residential occupier to move house and provide the appropriate infrastructure for small business units, industrial compounds and possibly some office accommodation to the rear.

* There has been interest expressed in the industrial land, but the infrastructure costs and the negative planning approach means the land sits there with no possibility of it being developed – significantly reducing the opportunity of delivering a comprehensive approach a coordinated effort

* Many people in Halesworth travel to Saxmundham (Tesco and Waitrose), Beccles (Morrison and Tesco) and Lowestoft/Pakefield) (Tesco, Morrisons, Marks and Spencer, Asda). The CO-OP in Halesworth has a monopoly and their prices are well above those of the main supermarkets. This is hardly a sustainable situation, therefore competition is crucial.

4.0 Summary

* The existing allocation for Halesworth Broadway Farm Industrial Area has been reduced in size, with the possible consequence that it will become even less viable

* The original allocation would be viable provided the frontage area could be allocated for high value retail. This would provide the necessary investment to facilitate the infrastructure and services to trigger the development of the whole estate.
* The initial access route can be provided via a simple T junction with a widened road - Ghost Island for right turning vehicles off the A144 (See attached sketch Master Plan). As the estate becomes established a second point of access would be provided by re-modelling the roundabout. The land to provide both options is available within the ownership or highway.

* The area under the power cables would be suitable for retail parking but little else.

* To become viable the allocation needs to remain the same size and in planning terms some flexibility needs to be shown to allow frontage retail development to kick start the infrastructure.

* There is much interest in this development, but at present the infrastructure costs exceed the land value, but by being flexible the planning authority could help bring forward employment land for the benefit of the local community. We have developers interested, but not where the land value is less than the infrastructure costs.

* Given all the above the LPA is requested to give this proposal consideration in order to introduce HAL2 as part of the FDLP.

Sketch Master Plan (attached)

**Attached documents**

Pauline Wilcock

Section Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID 295

Comment Broadway Farm Development – pleasing to see reference to pedestrian and cycle access. The programme of archaeological work should involve Halesworth and District Museum who have developed archaeological strategies and are working currently with all the necessary agencies for a planned dig @ Wissett.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID  1629

Comment  • WLP 4.5 (page 105) – Broadway Farm. The policy requiring upfront work is sound, but based on the revised area, which is smaller than that previously commented on at Issues and Options stage, SCC would be likely to advise that archaeological work could be undertaken under a condition on consent for an application in this area.

Attached documents
Suffolk County Council Robert Feakes

Section: Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID: 1720

Comment: Existing Broadway Farm access would require improvement for increased use (width/visibility)

Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID 1679

Comment Pocket of surface water flooding along the south of the site

Attached documents
**Suffolk Wildlife Trust James Meyer**

**Section**  
Policy WLP4.5 - Broadway Farm, Halesworth

**Comment ID**  
1261

**Comment**  
This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Without an understanding of the baseline ecological value of the site it cannot be confirmed that the site is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

**Attached documents**
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section  Policy WLP4.5 - Broadway Farm, Halesworth

Comment ID  1136

Comment  Where it refers to Employment, we would support the statement from WLP 4.5 & WLP 8.13.

With the indicated planned housing development of 740 of which already have planning permission or have been completed since 2014, the need to support more employment development (WLP4.5 Broadway Farm) is vital and a mechanism to ensure delivery of this should be established.

Attached documents
Strategy for Bungay

Bob Prior

Section Strategy for Bungay

Comment ID 668

Comment

I would like to make comment on your Draft Local Plan.

On the face of it, it appears to be very little research undertaken with the residents, support services and businesses of Bungay or indeed with South Norfolk - it would be interesting to know the volume and demographics on people consulted so far.

Your 'Plan' is a really important document in Bungay's future and I feel that this draft is a good discussion document but by no means thorough enough to give it substance. More work needs to be done, because in its current form I believe that Developers and other agencies will ride roughshod over it fearing it will become meaningless and a waste of everybody's time and rate-payers money. If this were a school report, my comments would say 'could do better – much better!'

Attached documents
**Bungay Honeypot Centre**

**Martin Evans**

**Section** Strategy for Bungay

**Comment ID** 1200

**Comment**

With the proposed extra housing, particularly those to be grouped around the Swimming Pool/High School, it is ever more vital that the planned new Community Centre, located on the Old Grammar School field at the epicentre of the modern Town, replacing the old war-time building in Upper Olland Street, be actioned urgently as possible. As well as completing the Community Hub cluster, involving the Health Centre, the planned Skinners Meadow outdoor exercise area, the new state-of-the-art childrens play park/skate board park plus the Fire Station, the relocation of the Community Centre will free up the land in Upper Olland Street for c. 8 houses and contribute funds towards the new Centre. The old Centre, long past its economic renovation, provides community space for a youth club, Cadets force, Mothers & Toddlers group, Country Market, Bungay Society lectures, Bungay Theatre Group productions, Weight Watchers, Bingo, Three Rivers Newspaper for the Blind recordings and a variety of other one-off hirings. All these activities will relocate to the new Centre and in addition provide the local area with modern facilities for conferences, seminars, wedding receptions and other social gatherings. It will underpin the adjacent facilities as a true destination play park.

**Attached documents**
Bungay Medical Centre Property Company Ltd Iain Huggins

Section Strategy for Bungay

Comment ID 761

Comment As Company Secretary of the Limited Company that owns the building that the Bungay Medical Centre occupies, I wish to express the concerns of the Company Directors to the "Extension to Bungay Medical Centre" which will be required in support of the growth plans for Bungay.

There has been no prior consultation on this subject with ourselves as Company Directors.

I also note that there will be need for a "new Community Centre on Old Grammar School Lane". The proposed site is adjacent to the Medical Centre, and the existing proposal for the new Community Centre already makes insufficient car parking provision, before any proposed extension to the Medical Centre (where parking as already at a premium).

Iain Huggins

Company Secretary, Bungay Medical Centre Property Company Ltd

Attached documents
Bungay Neighbourhood Development Plan Steering Group Ken Lodge

Section  Strategy for Bungay

Comment ID  1519

Comment  Employment and tourism: businesses in Bungay, whether home-based or otherwise, should be encouraged and maintained. Prospects of employment in the town are few, so any increase in the population will have to bear transportation of employees in mind. Tourism needs more attention than it gets at the moment. The town has no hotel and yet there is a prime town-centre site for one. The centre of the town generally around the Butter Cross and central square needs refurbishment and upgrading, keeping in mind the historical nature and aspect of the town. Apart from employment in small shops, Bungay has two major employers: Clays (book printers) and four care homes. Owing to the natural boundaries of Bungay it is difficult to foresee the development of large-scale employment. Start-up businesses should be encouraged, with suitable grants, and building upon the focus of Lowestoft on the development of energy. Tourism should provide much needed revenue and development of the river system surrounding Bungay should be encouraged. Communication systems need upgrading and land should be made available for mobile telephone masts.

Attached documents
Bungay Neighbourhood Development Plan Steering Group Ken Lodge

Section
Strategy for Bungay

Comment ID
1521

Comment
Provision of appropriate facilities for the elderly and infirm need to be considered carefully. If the current demographic forecasts are correct, there will be an increase in the population of the over 75 group in Bungay, as everywhere else in the United Kingdom. Such provision must include appropriate housing, care facilities, respite for carers and further day care centres. Access to and from the town must be considered as well.

Attached documents
# Bungay Neighbourhood Development Plan Steering Group Ken Lodge

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<tr>
<td>Comment ID</td>
<td>1520</td>
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<tr>
<td>Comment</td>
<td>Some clarification of the situation regarding new industrial units on the plot surrounding the swimming pool is necessary, especially in the light of the recent development of such units in Ditchingham near Falcon Meadow. Refurbishment of the already existing units in Southend Road and better design of the layout to incorporate more units should be considered.</td>
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**Attached documents**
Bungay Neighbourhood Development Plan Steering Group Ken Lodge

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<th>Section</th>
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**Comment ID** 1518

**Comment** This response is based in part on the public responses we have been receiving over three consultation periods: December 2016, February 2017 and September 2017. We have used questionnaires in the last two and will be in a position to analyze the full response after the end of October. Some of the topics people brought up in face-to-face discussions on the consultation days. The present NDP consultation phase is spread over two months, after which time a more considered report will be available. All the points raised in what follows come under the National Planning Policy Framework (March 2012). It is independent and separate from the response of Bungay Town Council.

**Attached documents**
**Bungay Town Council P Morrow**

**Section**  
Strategy for Bungay

**Comment ID**  
1553

**Comment**  
Employment. Developed research of the employment opportunities that can be provided for Bungay will be vital in the 2nd Draft. With the additional housing being proposed, local employment opportunities will be critical to the vitality and sustainability of the town especially as the average age in Bungay is now at a working age of 47 years old. Employment land/ opportunities may be available within the neighbouring Norfolk parishes and these cross-county parishes also need to be considered within the Waveney Local Plan.

Economy. To boost the local economy there will need to be provision for startups to be encouraged to relocate to the area.

Economy. There should be further promotion of tourism within the Bungay area to boost the local economy. The brand of 'Bungay' should be identified and its facilities promoted across the District and further afield.

Economy. Within the next draft of the plan we would wish WDC to develop provisions for driving the economy of Bungay forward.

Economy. The offering from the High Street is a critical part of the attraction of a town for residents and visitors alike. A varied High Street is necessary – and policies will be required within the plan to enable this to be provided in the market town of Bungay.

Tourism - There should be further promotion of tourism within the Bungay area to boost the local economy. The brand of 'Bungay' should be identified and its facilities including the existing Heritage Project should be promoted across the District and further afield.

Tourism – Hotel provision in Bungay should be increased – this will enable visitor numbers to increase.
Attached documents
Christine Brown

Section  Strategy for Bungay

Comment ID  389

Comment  The proposed extra housing will put a strain on the current infrastructure and this will need to be reviewed eg Medical provision, schools and will the current sewage works able to cope with the extra waste without Bungay becoming a town that smells of sewage

Attached documents
Debbie Read

Section  Strategy for Bungay

Comment ID  7

Comment  I have read the local plan for Bungay and see there is no detail regarding the extensive issues regarding parking on the "older residential " roads near the centre of Bungay. There are already wide ranging problems for residents and no action seems to be detailed to alleviate these. Also given the announcement recently about the changes to vehicle power in 2040 would it not be an idea to detail how the council is going to respond to the demands of Electric Powered Vehicles in the future. I am aware these regulations come into play after the end of the period stated in the development plan but surely this issue will be of concern and will need addressing before 2036.

Attached documents
Dominic Belisario

Section  Strategy for Bungay

Comment ID  801

Comment  Having read the Waveney Local Plan I am most distressed at the way local planners are disregarding local issues and blighting the lives of many residents. Time and time again you talk about consultation, but when people like me write to you explaining how things can be done differently you pay them lip service and just go ahead with what you wanted to do in the first place. Where is your moral compass?

In the opening pages the plan talks about sustainable development, but in many cases you are building on agricultural fields. To be sustainable we should be growing food on these fields that can be processed locally, thus providing jobs and sold to local residents. How can you justify saying that you are doing sustainable development? You should be building on brown field sites first AND once all of those have been built on you should consider other options. It looks to me that you are feeding the greed of wealthy farmers who can make more money by selling land to developers than by growing food.

With respect for your ideas for development in Bungay, where I have lived for the last 40 years, I am not impressed. You want to build new homes, but pay lip service to providing infrastructure. I guess this is a way for Councils to raise additional finance via taxes, but not spend any of it.

Bungay is an historic town whose character is being spoilt by local councils. They build houses where garages exists, which then forces the car owners to park their cars on the streets which in turn makes travelling a nightmare. This leads to people avoiding the town. Not a good thing if you want to attract tourists!

There is no commitment to build a North/South bypass. Consequently, such traffic has to negotiate the narrow streets to complete their journeys. This leads to more noise and air pollution. This will be made worse if the attempt to get an employment area running next to the swimming pool is successful. Making it even worse will be the additional housing
development! Where is your common sense?

I understand that the medical centre has around 11,000 registered patients, but Bungay only has a population around 5,000. The medical centre has to service a wide geographical area that includes Norfolk. Nothing in the development address the growth in Norfolk that has an impact on Bungay? For instance why is the new housing on the old Ditchingham Maltings site not included as new homes for Bungay. They must have an impact on the development of local services and infrastructure?

Why is the plan persisting with the idea of building a new community center next to the Medical Centre and with only eight car parking spaces (as I understand it)? Would it not make more sense to divert the money from this project to the old Kings Head refurbishment as a focal point in the town? This would leave more green space for leisure at the proposed site. Yet another instance of how your policies say one thing and the plan does another.

In the previous plans I am sure there was land in Mettingham set aside for development. I do not see it in the current plan. Nothing to do with local councillors living in that village?

Rather than creating buildings that disrupt a very scenic view across "Tin River Valley" – another instance of policy and planning not converging, why does the plan not consider development to the east side of St Margaret's Road or the south side of Flixton Road? In mine, and many people opinion, there should be no further ribbon development along St John's Road.

Rather than progressing housing development the Council should improve the infrastructure and services to meet the current needs of the town BEFORE progressing to future development.

Should the development go ahead will there be any compensation for residents affected by its construction and the loss of vistas?

I hope you will take these proposals on board and that I will see them in the next draft of the plan.

Attached documents
James Servaes

Section  Strategy for Bungay

Comment ID  46

Comment  
* How will new housing contribute towards a new Community Centre, which is desperately needed now not in 10 years time?

* If 527 houses are developed during the plan period taking the average occupancy figure as 2.2 persons per house the level of increase is 20% (+/-). Is this a modest growth.

* The NHS provider, Bungay Medical Practice, has a patient number of over 11,000. It struggles to cope with the current figure for reasons already referred to in this plan and it’s response times for appointments is pressured.

Attached documents
Judy Cloke

Section | Strategy for Bungay

Comment ID | 699

Comment | You may remember when I attended the presentation of the WLP at Canning Road a few weeks ago in my role as chairman of the Environment & Planning Committee, Bungay Town Council, I mentioned the omission of the site in Upper Olland Street where the Community Centre rests at the moment.

This site has been given to the Trustees of the Community Centre as part of the funding for the new centre. In the current WLP, this is shown as a site for development - 8 houses, I believe - but it does not appear in the new plan.

You advised me to email and bring it to your attention, which is what I am doing now.

Attached documents
Lesley Ward

Section Strategy for Bungay

Comment ID 438

Comment I am concerned about the increase of southbound traffic, all travelling down Trinity St, which further development to the south of the town will bring. This is an historic street, which has already suffered a fourfold increase in traffic, noise and pollution since the introduction of the one way scheme. Are there any plans to improve the infrastructure?

With the new Riverside Development in the old maltings in Ditchingham, there have been increased pressures on the Bungay Medical Practice and I fear this will worsen with too much additional development. If at some future point the surgery needs to expand, the logical area for building would appear to be to the south of the building, where the proposed new community centre will be.

Attached documents
Mettingham Parish Council Maxine Williams

Section Strategy for Bungay

Comment ID 148

Comment Concerns were raised during our last Meeting regarding the infrastructure in the local area with the amount of building planned.

A councillor also mentioned that there appeared to be no policy regarding "Brown-field" sites. Could you please get back to me regarding this point

Attached documents
Simon Woods

Section Strategy for Bungay

Comment ID 639

Comment In full agreement with the two sites proposed for Bungay, and the numbers, with the proviso that all necessary enhancements to all aspects of the local infrastructure are made

Attached documents
**South Norfolk District Council Adam Nicholls**

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<th>Section</th>
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**Comment ID** 1591

**Comment**

- The strategy to allow a modest level of growth in Bungay to protect the sensitive landscape around the town is welcomed. It is pleasing to read that the new housing will help to contribute towards the delivery of a new fit-for-purpose community centre and support shops and services in the town centre, which will be of benefit for the population of those villages in South Norfolk which tend to look to Bungay for their day to day needs.

**Attached documents**
Bungay Infrastructure

Anonymous

Section
Bungay Infrastructure

Comment ID
317

Comment
[WLP5.1] Sewage needs to be improved it cannot cope now. Worried about the ditch at bottom of field. Often full of fast flowing water. Very dangerous now without further housing built. Also the bottom of field in winter very muddy

Attached documents
Anonymous

Section Bungay Infrastructure

Comment ID 312

Comment The roadways in towns at the moment is near capacity at peak times ie placing development south of Bungay will add to this as the rout to the major road A143 is through the town or via country lanes to Flixton.

Employment – How are you going to attract new industries into the area to give employment to the population growth without improving the road infrastructure – currently in my opinion Lowestoft is a no-go for many industries due to access.

Although it say NHS are looking at improving GP surgeries this historically badly lags behind so I propose some form in incentive is investigated to encourage this to happen.

Some good ideas in the plan but I think some practical application should be applied instead of nice to have planning & touching the forelock to political policies.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section  Bungay Infrastructure

Comment ID  1022

Comment  Welcome inclusion of:

* Improvements to the cycle network as identified in the Waveney Cycle Strategy

Attached documents
Bob Prior

Section Bungay Infrastructure

Comment ID 669

Comment It seems to me that there are too many vague statements without much substance for example 'expanding the doctors surgery' without saying how, why or where! There is no mention of improvements needed to the infrastructure (drains, roads etc.) that must be address before any more houses are built. There are serious issues that should have been dealt with years ago, and it would be unrealistic to expect any developer to correct all the ills of the past. If you expect that to happen then no development will materialise.

I feel not sufficient emphasis has been put on what effect the development of neighbouring Ditchingham or Earsham will have on Bungay. The only mention was of a possible additional sports pitch at The Maltings Sports Complex (now known as The Pavilion) which is not currently planned and indeed there is not sufficient space for!!! Even if it was planned it would have an insignificant impact on Bungay.

Other omissions are the demand for school places, shopping facilities, local employment and the community creation within the new developments. You could also have questioned the siting of the proposed Community Centre, bearing in mind you say that the Medical Centre would have to be extended on the site next door. and if it would serve the needs of an increase in population.

Attached documents
The main concern with the plan, as it stands, is that very little beyond statements of intent is written in regarding the upgrading of the infrastructure of the town. It also appears that there is a lack of background knowledge of the situation in Bungay: for instance, there seems to be no recognition that Maltings Meadow sports fields (the Pavilion) are situated in South Norfolk, not Waveney. The directors of the sports fields have not been consulted about this development and indeed there is no physical space to put in such a pitch. There is also no indication what impact this will have on Bungay over the next 30 years. Equally, the contradiction of an expanding surgery and a community centre on the adjacent site does not seem to have been spotted (WLP5.2 infrastructure requirements). These infrastructure issues must be addressed with greater vigour, even if the numbers of new houses to be built to the south of the town are only partially fulfilled. There seems to be a particular lack of concern about the future developments in Ditchingham and Earsham, both in South Norfolk, but both of which will have a significant impact on Bungay’s infrastructure.

* The surgery: the practice is already overloaded with some 11,000 patients, many of whom come from beyond the town’s boundaries. A statement to the effect that the surgery will expand (§5.3) has no meaning given the current situation. The physical needs are overstretched even now, e.g. doctors’ and other staff parking, so the question has to be answered as to where the physical expansion would take place. Understaffing is a current issue, too, so consultation with the appropriate CCGs and the surgery itself is absolutely necessary.

* The schools: the numbers in the schools may be satisfactory at the moment, but any expansion would put a strain on the current resources, especially as regards early school provision and at the primary schools. For example, there is insufficient outdoor space at the present location of the latter, so extra pupils would create real problems. As far as the high school is concerned, there will be increases in pupil numbers, if the building
developments in Southwold (Reydon) and Halesworth, for example, go ahead. The future of the old middle school site should be brought into the planning mix. This site, which presumably belongs to Suffolk County Council, could be refurbished as the site of the primary school at present in Wingfield Street, and community-related buildings provided on the same site, giving a social hub for the town. We have already met with the two heads concerned, who are enthusiastically pursuing this idea. The old middle school site also contains some important green spaces and land available for future houses.

* The road system of the proposed sites needs to be carefully considered. Any new outlet onto St John's Road needs the installation of roundabouts. This would have the added benefit of slowing down traffic coming into the town from the direction of Halesworth. The present junction with Kings Road could be treated in the same way. As far as access to the old town centre is concerned, there is insufficient parking at the moment, so any increase in road traffic would exacerbate the situation. Alternative forms of access are equally poor. There is no safe pedestrian access to town: the junction with Hillside Road West is busy and particularly dangerous for pedestrians. There are no foot crossings in place, even going across St John's Road into Hillside Road East, the current access to the Co-op. Cycle paths are no better in this respect. Add to this the extreme difficulties of disabled access from the designated sites and the overall picture is far from satisfactory.

* Shopping: for those who are to live on the southern approach to Bungay there is only one convenient option for shopping, the Co-op on Hillside Road East. A way of creating more of a community in the area to be developed would be to designate an area for shops, including one further supermarket.

* Sewers: the Bungay sewers are inadequate now and are operated on an antiquated system of combining foul and surface water. Ever since the 1950s this is not a system that is encouraged. Over time, the clean sewers in many areas have become polluted by misconnected wastewater. With more development, 'urban creep' and the trend for house alterations and DIY improvements over the last twenty years these misconnections have become more common. Pollution comes from surface water sewers because run-off from our urban areas is not always clean. Atmospheric fallout from traffic, spillages and road accidents, illegal discharges, vehicle washing and foul sewer failures all end up discharging into our rivers and coastal waters. As well as wastewater getting into clean surface water
drains there is a problem caused by 'clean' misconnections. These occur when roof drains and clean surface areas are connected to foul sewers. This excessive rainfall causes foul sewers to overflow often into rivers but sometimes even into properties, as is the case in Bungay. It also means that more diluted wastewater has to be pumped to sewage works and then treated. This adds to treatment costs and energy use. So a very careful upgrading of the sewerage system in Bungay is necessary.

Attached documents
Bungay Town Council P Morrow

Section  Bungay Infrastructure

Comment ID  1550

Comment  Community Facilities; improved library provision. Requirements relating to this provision should be the subject of discussion with both the county wide body who co-ordinate this and the local one who deliver these services.

Community Facilities; It was noted that there are 2 infrastructure improvements being suggested a) Build a community centre, b) Extend Health/ Medical centre.

Attached documents
Bungay Town Council P Morrow

Section Bungay Infrastructure

Comment ID 1549

Comment Education. Infrastructure enhancements in this area should recognize the impact of new housing provision not only within Bungay but also within the wider area which is part of the catchment area for the Bungay schools; this point is particularly relevant to Bungay High School.

Health Care. Bungay Medical Centre provides medical services to an area far more extensive than the civil parish of Bungay. The Plan should recognize this and ensure that the health care infrastructure requirements fully reflect this and take account of potential development in this wider area.

Attached documents
Bungay Town Council P Morrow

Section Bungay Infrastructure

Comment ID 1552

Comment Open Space. A policy for the open space area at Hillside Road – Beccles Road will be required. Recreational use may be appropriate.

Recreational. There seems to be no rational for a new artificial pitch at The Maltings.

Attached documents
Bungay Town Council P Morrow

Section Bungay Infrastructure

Comment ID 1548

Comment The Council noted and broadly supported the infrastructure requirements outlined on page 108 of the Plan document. However, the Council considered that these requirements should be enhanced as follows:

- **Transport.** To facilitate use of public transport the new developments should include highway layout and provision which will allow PSVs to access the new development safely, conveniently and with the minimum impact on the residential occupiers. In addition, provision should be made at the outset for bus shelters.

- **Transport.** Consideration should be given for the provision of roundabouts on St John's Rd/St John's Hill. The recommended expanded development to the west of St John's Rd may lead to the requirement for a roundabout at the junction of the existing housing and employment land with St John's Rd. In addition, the increase in traffic flow at the foot of St John's Hill which these combined developments will generate can be mitigated by a roundabout at that location.

- **Transport.** If employment opportunities are not available locally then new housing will create extra traffic both around the town and on the outskirts. Traffic assessments may be required.

- **Transport - car parking.** Provision will be required for electric cars. Long term car park for buses/coaches will be required.

Attached documents
## Bungay Town Council P Morrow

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**Comment ID** 1551

**Comment** Utilities. It was noted that in some parts of the town the sewerage network is already subject to ‘failures' in certain circumstances. Improvements in the network relating to the proposed growth plans should be sufficiently comprehensive to address the current inadequacies and the increased demand that the growth will place upon this part of the infrastructure.

Communications. Improvements in the infrastructure relating to electronic communication should form part of the infrastructure requirements as this is an extremely vital component of the infrastructure.

**Attached documents**
Christine Brown

Section Bungay Infrastructure

Comment ID 390

Comment The proposed New Community centre on the field at Old Grammar Lane does not have adequate access roads and will be an danger to road users in Old Grammar Lane as stated by the highways department on the original plans for this development. The parking provided is inadequate and will cause a danger to the numerous children who already use this park in a safe environment. The added amount of traffic that will be attending the doctors surgery with the addition of the new houses and the proposed extension to the medical centre will cause even more parking/traffic problems in the area. The area around the playing field and doctors is already overloaded and the addition of the Community Centre and added traffic will cause a major problem for users of both facilities and the road users/residents of the surrounding roads.

There is also a documented shortage of green open space in Bungay and the playing field should remain as a green open space, this is the most used open space in the town. The green is used for football, cricket, picnics etc and by building on this space this will push the young people of Bungay back onto the streets.

The traffic bottle-neck on Lower Olland Street/ St John's Road needs to be looked at this has become a nightmare to negotiate and a danger to use for both road users and pedestrians as on occasions vehicles have to mount the pavement in order to get past the oncoming vehicles and parked cars.

Attached documents
Didy Ward

Section  
Bungay Infrastructure

Comment ID  
3

Comment  
I approve the plans for additional housing to the South of the High School and also on St. John's Road but am very concerned about how our health centre will be able to cope with all these additional families, especially as it is struggling now.

Attached documents
Mr C A Gray

Section  Bungay Infrastructure

Comment ID  315

Comment  All of the development proposed for Bungay will put a great strain on local schools, surgery & sewerage treatment/drainage facilities.

Attached documents
Susan Collins

Section Bungay Infrastructure

Comment ID 653

Comment

There are 2 key infrastructure improvements that appear to be in conflict:

Extension to Bungay Medical Practice and New community centre on Old Grammar Lane are planned developments that are situated adjacent to each other. Should the building of a community centre go ahead on Old Grammar Lane there is physically no room to extend the health centre. The current plan for the community centre is cramped and scant on parking space and is unpopular with many residents in the immediate locality. It also uses up green space close to the centre of town that would be ideal to preserve for informal ball games and leisure activities. It states within the plan that Bungay is short of green open space.

However the recent proposal from the heads of the 2 Bungay schools to develop the now vacant site on Hillside Road East that was previously the Bungay 6th Form has provided some new options that should be given consideration. This 12 acre + site could accommodate the primary school with sufficient space for it to develop and be a sustainable asset, it could also retain space for sports and recreation as well as provide an ideal alternative site for a community centre. In addition there would be the potential for daycare/intergenerational facilities whilst still affording space for some housing units. This is a superb opportunity for the development of the town and I urge planners to give it full consideration.

Please revisit the proposal for a small artificial pitch at the Maltings Pavilion. Firstly this site is not part of Waveney and therefore it is unclear why it is considered part the Local Plan at all as it is out of county, and even if it was, the positioning of the artificial pitch, according to the management of the centre, is entirely in the wrong place and could not practically be realised.

Attached documents
Strategic site allocations in Bungay

Anonymous

Section Strategic site allocations in Bungay

Comment ID 311

Comment Talking to the planning officer I feel the dwelling ratio is low and optimistic of 1.4 per dwelling.

Attached documents
Policy WLP5.1 - Land East of St Johns Road, Bungay

Anonymous

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 316

Comment Opportunity to have a traffic calming effect on St John's Road if the access to WLP5.1 and WLP5.2 has a roundabout in the neighbourhood of the swimming pool access road.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 1024

Comment Welcome inclusion of:

* a pedestrian and cycle path should be provided along the northwest of the site, linking St Johns Road to Kerrison Road and providing connectivity to Meadow Road.

This path should also connect into the site with planning consent between Kings Road and the swimming pool. We think the link to "Kerrison Road" should read link to "Mayfair Road".

Attached documents
Bob Prior

Section  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  124

Comment  I agree that we need more housing, but would suggest that the allocation of WLP5.1 be moved to abut WLP5.2 on plot 209. This would be far less problematic and more cost effective to develop whilst avoiding the flooding and drainage issues associated with WLP1. It would also make St John's Hill safer (although some safety engineering works will still need to be undertaken) as there would be fewer junctions needed. The motor traffic could come through already planned developments, and footpaths and cycle-ways could be routed though well established estates or onto St. Margaret's Road.

Attached documents
Bungay Neighbourhood Development Plan Steering Group Ken Lodge

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 1524

Comment Remove WLP5.1 as a development site because of water drainage difficulties of the sloping terrain to the Tin River. Appropriate land should be made available for green space, as Bungay has below the level of recommended land available for green space.

Attached documents
Bungay Town Council P Morrow

Section  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  1546

Comment  The Council considered that site WLP5.1 should not be one of the allocated sites. Concern was expressed about water drainage issues relating to this site; it was noted that this would be via Tin River which is not considered adequate to meet the additional water drainage requirements of this site.

The Council considered that the housing allocation relating to WLP5.1 should be delivered from a site (identified as new 209 for the purpose of this response) located immediately to the west of WLP5.2, approximately in the position of site 209, a site considered but not included in the 1st Draft allocation. New 209 would be accessed via the existing housing and employment land on St John’s Rd and the proposed development at WLP5.2. The Council considered that this expanded site would allow for the provision of a comprehensive development which, because of its increased size, could include materially enhanced park and play space facilities.

Attached documents  http://consult.waveney.gov.uk/gf2.ti/af/799778/135623/PJP-/8730325%20201%202017%20%20%205%20%20Bungay%20Town%20Council%20BTC%20WDC%20Local%20Plan%201st%20Draft%20mapjpeg.jpeg
Diane Scott

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 537

Comment It is more logical & cost effective to develop land all land on the West side of the A144 (the swimming pool side) including WLP 5.2, site 209 and all other land to the west before developing site WLP5.1. The west side is less visible from the A144 and infrastructure would already in place on the west side for land that currently has planning permission. Development to the west of the A144 will also dissipate traffic more easily and give easier access to the high school without pupils having to cross the A144.

There is no point in requesting a Transport Assessment and Travel Plan without a Bungay bi-pass being built and traffic calming measures budgeted for. Otherwise the proposed 305 houses at WLP 5.1 and WLP 5.2, in addition to the site with current planning permission to the West of the A144, would generate car ownership of at least 700 more vehicles, with no possible alleviation of this additional traffic.

Attached documents
Didy Ward

Section  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  571

Comment  I approve the plans for additional housing to the South of the High School and also on St. John’s Road but am very concerned about how our health centre will be able to cope with all these additional families, especially as it is struggling now.

Attached documents
Dominic Belisario

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 802

Comment

With regards to site WLPS.1, land East of St John’s Road, I must object quite adamantly that this should not go ahead, and yes it is virtually in my back garden and I am proud to be a NIMBY if it protects the countryside and character of Bungay.

Bungay’s town resides in the bottom and side of the Waveney Valley. Developments above the valley sides just makes it seem like a town with urban sprawl – as can be seen by the development on the other side of the proposed development. I doubt if many of the people living in the proposed development would work in Bungay, so that would generate more traffic through the town. If access is via a junction onto St John’s Road then I believe that would be a very dangerous option.

I take great offence to the proposal for landscaping the boundary with the farm, yet putting a public footpath on the opposite boundary – the back of my garden. The one family at the farm get green views while the twenty or so families on the opposite side get noise and dog poo! If the development goes ahead why can the "footpath" not just use the roads in the development? This would reduce disturbance for twenty families and remove the requirement to maintain the footpath. Quite where you get the idea that the unofficial footpath is a cycleway is a mystery to me. Having lived there for 10 years I’ve never seen a cycle in use on the field.

Rather than creating buildings that disrupt a very scenic view across "Tin River Valley" – another instance of policy and planning not converging, why does the plan not consider development to the east side of St Margaret’s Road or the south side of Flixton Road? In mine, and many people opinion, there should be no further ribbon development along St John’s Road.

Rather than progressing housing development the Council should improve the infrastructure and services to meet the current needs of the town BEFORE progressing to future development.
Should the development go ahead will there be any compensation for residents affected by its construction and the loss of vistas?

I hope you will take these proposals on board and that I will see them in the next draft of the plan.

Attached documents
## Environment Agency

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP5.1 - Land East of St Johns Road, Bungay</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>872</td>
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<tr>
<td>Comment</td>
<td>Whilst the policy indicates that the area is at risk from flooding, we believe it should indicate that any planning application should include a flood risk assessment to demonstrate that future development is safe and does not increase flooding elsewhere.</td>
</tr>
</tbody>
</table>

**Attached documents**
Heather Tate

Section        Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID    556

Comment        I am very concerned reference the plan, in particular WLP5.1. I have lived in my property on the North West boundary of this site for 46 years and have seen many changes. On our boundary was a part of the original hedge and we added privet to fill in the gaps. This along with the set aside encouraged, and still does, hedgehogs, grass snakes, frogs, newts and birds and are regular visitors into our garden. For many years this site was all on set aside when owned by the late Mr Skinner. It became a wilderness, creating many problems of weeds, dandelions etc seeding into our gardens. When the present farmer took on this land it became an excellent well kept agricultural land, the wildlife continued to flourish and we heaved a sigh of relief. We are concerned that we are now going to lose more agricultural land when it is desperately needed in this area.

We see from the Waveney District Council, strategic planning consultations that "houses and landscaping adjacent to St John's Road should be laid out and developed in a manner that does not obscure views of the listed Dukes Farm and Barn from St John's Road". Any development on this site will obscure the beautiful views of the country side which ever direction you look. Dukes Farm may be listed but the barn certainly isn't, it was burnt down a few years ago and a brand new larger unit was built.

There is already planning permission for development on the opposite side of an already very busy road and public swimming pool and with other more suitable sites turned down it would be unthinkable that more pressure is put on this area.

I note from the Waveney local plan for the future of Bungay that an extension will be built at Bungay medical practice. Why is this even considered when from no fault of their own the practice is already struggling? Bringing more people to the area and an extension to the practice will not produce more Doctors, nurses etc. Surely the
infrastructure needs to be addressed before any more development into the green belt is considered. Where is the work to support all the extra families that the housing will bring to the area?

Looking at the plan of the proposed public footpath/cycle way going through a proposed housing development and crossing the tin river and a very busy main road doesn’t seem appropriate, there must be safer options. I still have very vivid memories of watching the flood waters building up on the fields behind this site, the tin river not being able to cope and eventually burst through, flooding Mayfair road, Hillside Road east and the then Utilux factory where I used to work, being flooded to such an extent some of the workers had to be rescued by boat. Going to Mayfair road to see if I could help, seeing people sobbing as they stood waist deep in flood water is something I will never forget. Fortunately this has not happened since but the state of the tin river full of rubbish, weeds etc is another thing to be addressed.

I attended the exhibition at the Fisher Theatre and the representative from Waveney District Council was extremely helpful and explained the proposals very well, even though we gave him a very hard time!! Unfortunately I did not get his name but we did appreciate how well he explained it all. Having been born and lived most of my 72 years in Bungay I would hate to see our beautiful rural area encroached on any further.

Attached documents
Holly Stranks

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 105

Comment In reference to WLP5.1 I would not like to see any vehicle access from Mayfair Road. Our road is narrow and has significant bends with on street parking, I believe there would be safety issues if there was an increased volume of traffic.

My other concern is sufficient provision for drainage. Neighbours who have lived here for the past 30 years have stated that there were three occasions where the "Tin River", which is behind us, has reached a level where it has burst it's banks and flooded our gardens from the southern end. I am aware that there is consideration for lagoons and water holding areas to be provided, however, we are suffering increased rainfall and the run off that feeds this river covers a large catchment. It is therefore, possible that these lagoons could reach their capacity when the river is in flood. I believe this would increase our flood risk, given the immediacy of rainfall on hard surface on the proposed developments in that area.

Attached documents
Linda Gray

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 1041

Comment Having lived in Bungay for many years and living where I am with my husband we have on several occasions been informed that the fields behind and adjacent to our property that building planning is being sought,

We live right near the tin river as it's commonly known as, this when it is raining continuously overflows in places along the fields and causes flooding in areas,

We understand from the plans that we've seen the field is being sought to build up to 85 dwellings along with housing on opposite side of the road next to the swimming pool,

A drainage system that will run into a holding pond is to be built to cater for drainage off field,

This I feel is very unsafe and unsuitable due to the fact there is a local playground right opposite the field in question, as a parent who's children have used the playground on Meadow Road it will be a BIG risk factor to take into consideration when looking into this part of the planning process, also if this holding pond were to overflow whilst a considerable amount of water is coming through the river from the fields around it again it will cause more problems with flooding, the bungalows that are in Mayfair Road are situated just in front of the tin river, these were put under threat of flooding before,

I really feel that this part of the development for Bungay should be seriously considered as a rejection, we have problems with the sewage system how can more housing be good for this, again a strain on the system as with the Drs surgery and the schools, all added pressure on an already busy area, Both will need extra staff, building to make the buildings big enough to cater for the extra persons coming in to the area, Where will this funding come from to do all this,
Council tax rises etc, we have lost our local council office and police station.

I understand we need more housing, private and council rentals, maybe they should have considered the sale of council properties that have caused a shortage in this area.

Thank you for taking the time to read my objections,

Attached documents
Malcolm Tate

Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 559

Comment

(a) This site currently gives year round views of outstanding beauty to all the occupants of the dwellings bordering the North West boundary of the existing field ie. Fairfield & Kerrison Roads. It is reasonable to expect the new proposed properties bordering also the high elevated parts of the new development site should be single story so as not to obscure these views.

(b) I am of the opinion that the proposed cycle/foot path should be next to the existing boundary, this could then be retained & incorporate the existing set aside for wild life & fauna also providing a buffer zone between existing & new sites.

(c) The water course boundary & the North West boundary which has been set aside for many years should have a study carried out to ascertain the impact on wild life & fauna.

As a long term resident of Fairfield Rd. I have had the privilege of having wild life visiting the garden ie. Grass snakes, Hedge Hogs (daily), Newt's & dragon fly's in & around the fish pond (annually) etc.

(d) It should be checked as to the complete ownership of this site as I am led to believe that it could be still partly Trust owned.

(e) A condition of development should be the provision of a foot path on the East side of St. Johns Hill to join up with path on Hillside Rd East

Rain water storage soakaways & Flooding

As a long term resident of Bungay I am not aware of any problem with rain water on any of developments on the high ground to the South East of Bungay the lower strata being sand & gravel so soakaways work very well. The only problems that have occurred have been the result of failure to maintain & keep clear of rubbish the Tin river, the water course N.East
boundary of WLPS5.1

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/134109/PJP-/8671125%201%20201201080009JPG.JPG

http://consult.waveney.gov.uk/gf2.ti/af/799778/134110/PJP-/8671125%201%20201201080001JPG.JPG
Maureen Davison

Section  
Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  
765

Comment  
Following on from the exhibition at the Fisher Theatre on Tuesday 15th August 2017, when we were advised that Site WLP5.1 would be accessed from St Johns Road; I have been mindful of the amount of traffic that is delayed on a regular basis, due to vehicles turning into the Bungay Leisure Centre - which I'm delighted to say is very well attended.

Should Site WLP5.1 be chosen, the road system would need to be restructured into a dual carriageway, as it would be extremely dangerous for road users and pedestrians alike.

Also, most homes nowadays have at least one car for commuting, shopping, etc., so there would be 85 extra cars to plan for. The logistics for this, i.e. Service Roads; Parking Spaces, Footpaths, Street Lights, and, last but not least, an efficient sewerage system would be necessary, as it is already struggling to cope. The infrastructure required for Site WLP5.1, would, in my mind, amount to a colossal unjustified expense.

There is land already available with planning permission, adjacent to site WLP5.2, together with the Alternative Option 209, alongside. There would be no need to run all the 'services' across St Johns Road if WLP5.2 is adopted.

If, in your wisdom, you intend to go ahead with developing land at the east of St Johns Road, (which backs onto Kerrison and Fairfield Road) I trust that it will be bungalows that are erected, in keeping with the surrounding homes, which are mainly occupied by retired residents.

It is not us being selfish in wanting to keep our beautiful countryside to ourselves, it's just not a sensible proposition.

Attached documents
Mr and Mrs J V Palin

Section  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  522

Comment  Having studied the proposed plans for this site we would like to make the following points

1 This site is not suitable for developing because it is on a floodplain and development would be very expensive.

2 The sewage system would not cope with all the proposed development and a solution would need to be found.

3 There would be a strain on the Medical Centre with extra housing and also schools with extra children.

4 The proposed path and cycle in our opinion is not needed as the existing so-called ‘path’ has caused problems with vandalism and noise involving mopeds etc. A permanent path would exacerbate the situation and lead to more trouble.

5 Allowance has been made for screening the farmhouse, but no screening has been allowed for the properties bordering the site, and this is essential.

6 No mention is made regarding type of dwellings to be built. Low level housing would be needed ie. bungalows to preserve the sky line.

Having considered the above points we think that this is not a suitable site for development, especially as it would de-value approximately 15 dwellings bordering the site. Surely it would make more sense to concentrate on the Swimming Pool Site as it would be less visible from the road and less costly, as the infrastructure would already be in place for that site having already got planning permission.

Attached documents
Mr C A Gray

Section                  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID              314

Comment                 I am a resident of Kerrison Road and have a number of concerns about this proposed development. These include:

1. There is a significant slope on the site and I am concerned about surplus water likely to cause flooding by overloading of the Tin River. I am not reassured that the attenuation pond would alleviate this. I would also have concerns about the safety aspects of the pond (risk of children drowning).

2. There do not seem to be any plans for landscaping between Kerrison Rd and the proposed development. I feel there should be some adequate screening provided e.g. via trees. We would not want a mound for screening, because of the security issues involved.

3. I am concerned about the proposal for a cycle track between Kerrison Rd and St John’s Hill. I think this would constitute a safety and security risk.

4. All of the development proposed for Bungay will put a great strain on local schools, surgery & sewerage treatment/drainage facilities.

5. I believe it would be better for the local environment and the local economy if the field marked 209 and / or the middle school playing field were built on in preference to this site.

Attached documents
N L Lipscomb

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 308

Comment Far too large a development.

Attached documents
Peter Scott

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 532

Comment It is more logical & cost effective to develop land all land on the West side of the A144 (the swimming pool side) including WLP 5.2, site 209 and all other land to the west before developing site WLPS.1. The west side is less visible from the A144 and infrastructure would already in place on the west side for land that currently has planning permission. Flood prevention and drainage aspects of WLP 5.1 would be very expensive and are the reason it is not in the current plan. For these reasons WLP 5.1 should not be included in the new plan. Development to the west of the A144 will also dissipate traffic more easily and give easier access to the high school.

The Bungay sewerage system will not currently cope with the size of development proposed and a solution to that would need to be found before development is permitted.

There is no point in requesting a Transport Assessment and Travel Plan without a Bungay bi-pass being built and traffic calming measures budgeted for. Otherwise the proposed 305 houses at WLP 5.1 and WLP 5.2 in addition to the site with current planning permission would generate car ownership of at least 700 more vehicles, with no possible alleviation of this additional traffic.

The Bungay medical practice will not cope with development on this scale.

If site WLP 5.1 is developed, only low rise dwellings of a single story should be permitted on the North West boundary adjacent to existing housing in Kerrison Road and Fairfield Road and the proposed footpath and cycle path.

Any footpath and cycle path and new dwellings in site WLP 5.1 should be screened from the adjacent housing in Kerrison Road and Fairfield Road.

Any access to site WLP 5.1 should only be from St. Johns Road (A144) and there should be no vehicular access to Mayfair Road which is narrow and has a T junction with Kerrison Road adjacent to the boundary of WLP 5.1
Attached documents
Rob Holmes

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 313

Comment As our property borders this site we feel, that a buffer zone will be essential between our plot and any building behind us.

Also, where existing bungalows are sited in Kerrison Road, it will be important to us to have a bungalow as opposed to a 2 storey house.

Both will be essential to maintain our standard of life, not to lose the view we have enjoyed for 490 years and have space behind us.

Attached documents
**Suffolk County Council Robert Feakes**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP5.1 - Land East of St Johns Road, Bungay</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1721</td>
</tr>
<tr>
<td>Comment</td>
<td>Access from A144 St Johns Road. Utilise road width for Right Turn Lane at access. Seek new off-site rights of way to provide recreation opportunities into the surrounding countryside. Transport Assessment required</td>
</tr>
<tr>
<td>Attached documents</td>
<td></td>
</tr>
</tbody>
</table>
Suffolk Wildlife Trust James Meyer

Section Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID 1262

Comment This site was subject to wildlife audit in 2017 which recommended that a number of further surveys may be required if the boundary features were impacted upon by development. It also recommended that suitable buffers of the boundaries of the site be included as part of any development proposals. These recommendations do not appear to have been included in the proposed policy for the site. It must also be ensured that the design of any development includes significant ecological enhancements.

Attached documents
Tim Basey-Fisher

Section  Policy WLP5.1 - Land East of St Johns Road, Bungay

Comment ID  776

Comment  [As landowner] The proposed allocation of land east of St John's Road Norwich is supported. The land is suitable and available for development and can be released for development immediately (subject to obtaining planning consent).

The comments in paragraph 5.6 concerning the water course and approved drainage attenuation pond are noted. However, these factors should not affect the size and shape of the allocation. The allocation boundary should revert to the site as submitted with the original Call for Sites submission.

The additional land that this would encompassed at the proposed allocation's eastern edge would allow for a more comprehensive drainage and attenuation solution to be provided to serve both the extant planning permission (west of St Johns Road) and this proposed allocation. It is accepted that the area of land excluded immediately adjacent the water course is not suitable for built development. However, it would lend itself to multi use open space and landscaping (rather than built development) associated with the allocation. By removing these areas from the proposed allocation, pressure is put upon the amount of developable land available and the density, taking into account the need to accommodate open space, landscaping and drainage attenuation in a reduced site area.

The Policy's proposed number of dwellings (85) should be expressed as a minimum figure, rather than an absolute. The Policy's proposed density (30 dph) should be considered a guide rather than a requirement. The Policy's requirement for a 5m landscaping strip needs to be supported by evidence that this amount of landscaping is necessary, otherwise the requirement should be expressed as "up to 5m...."

The Policy's requirement for the site layout and landscaping to be laid out in a manner that does not obscure views of Dukes Farm and Barn from St John's Road is unnecessary. There
appears to be no evidence suggesting that the current views of Dukes Farm and Barn from St John's Road would be affected by the layout and landscaping of the site. In any event the requirement for a 5m landscaping strip along the south eastern boundary of the allocation may even conflict with this requirement.

The Policy requirement for a pedestrian and cycle route on the site's north-western boundary (within the allocation) is accepted, but the connections to Kerrison Road and Meadow Road cannot be required by the Policy as the land is outside of the control of the landowner and not in the gift of the landowner to deliver. The land needed outside of the allocation to complete the connections will need to be secured from 3rd Parties by the Council, otherwise the allocation is likely to be ransomed and its delivery will be compromised. The requirement for the planning application to be supported by the results of a programme of archaeological evaluation etc. is unnecessary as the requirement is covered by Policy WLP8.38-Archaeology.

Required Changes:

Amend the Policy and plan to:

1) revert to the previously submitted site boundary (4.6ha);

2) confirm that the density figure is a guide;

3) only include the provisions for a 5m landscaping strip if it can be evidenced that this amount of landscaping is necessary and include the words 'up to' 5m;

4) only include the requirements for the layout and landscaping to not obscure Dukes Farm and Barn from St John's Road if it can be evidenced that there could be an impact;

5) clarify that the requirement for a footpath/cycleway to be provided on the north west boundary of the allocated site is on land within the control of the landowner, with any provision beyond the site/allocation boundary for onward connections to be secured by the Council and not the developer.

6) delete the reference to archaeology.
Policy WLP5.2 - Land Rear of Bungay High School

Anonymous

Section  Policy WLP5.2 - Land Rear of Bungay High School

Comment ID  1512

Comment  Opportunity to have a traffic calming effect on St John's Road if the access to WLP5.1 and WLP5.2 has a roundabout in the neighbourhood of the swimming pool access road.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 1025

Comment Welcome inclusion of:

* an east-west cycle route shall be provided across the entire site, linking in to the land with planning permission to the east and allowing for future connections to the west.

This path should connect with St.Margarets Road as part of this development rather than as a “future connection”. It would provide an important cycle connection from the rural areas to south west of the town to the High School and the swimming pool and Mountbatton Road.

Attached documents
Bungay Town Council P Morrow

Section  Policy WLP5.2 - Land Rear of Bungay High School

Comment ID  1545

Comment  The Council supported allocation WLP5.2.

Attached documents
Didy Ward

Section  Policy WLP5.2 - Land Rear of Bungay High School

Comment ID  572

Comment  I approve the plans for additional housing to the South of the High School and also on St. John’s Road but am very concerned about how our health centre will be able to cope with all these additional families, especially as it is struggling now.

Attached documents
John Robinson

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 32

Comment One of my main concerns is that the existing schools and GP facilities in Bungay will not be able to cope with 300 hundred new houses being built. The primary school is at bursting point. The High school, which has now closed its sixth form annex at the old middle school site, will also be at bursting point. Neither of these two schools have any physical room to expand further. The GP surgery is struggling to cope with its present numbers, a possible 600 or more new residents on its books could be a disaster.

I fully understand that new housing is required, but so is further development of the existing facilities. What is proposed to meet these looming problems?

Attached documents
N L Lipscomb

Section
Policy WLP5.2 - Land Rear of Bungay High School

Comment ID
309

Comment
Far too large a development. Major impact on environment from increase of emissions/cars traffic. Only access by pavement to right up to St John's Road – inadequate.

Will be a blot on the landscape & change a small town with historic value to a suburban area.

If it goes ahead – trees & screening would be needed to protect house from Jenner Close, Thomas Bardwell Drive & Ethel Mann Road, to decrease noise & consultation would be required with residents/freeholders bordering this site – the disruption, noise, xtra traffic during development would be unacceptable.

Attached documents
Peter Scott

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 536

Comment It is more logical & cost effective to develop land all land on the West side of the A144 (the swimming pool side) including WLP 5.2, site 209 and all other land to the west before developing site WLP5.1. The west side is less visible from the A144 and infrastructure would already in place on the west side for land that currently has planning permission. Development to the west of the A144 at WLP 5.2 will also dissipate traffic more easily through and give easier access to the high school as pupils will not have to cross the A144.

The Bungay sewerage system will not currently cope with the size of development proposed and a solution to that would need to be found before development is permitted or only WLP 5.2 developed.

There is no point in requesting a Transport Assessment and Travel Plan without a Bungay bi-pass being built and traffic calming measures budgeted for. Otherwise the proposed 305 houses at WLP 5.1 and WLP 5.2 in addition to the site with current planning permission would generate car ownership at least of at least 700 more vehicles, with no possible alleviation of this additional traffic.

The Bungay medical practice will not cope with development of WPL 5.1 and WLP 5.2 so only WLP5.2 should be developed.

Attached documents
**Sport England Philip Raiswell**

**Section**  
Policy WLP5.2 - Land Rear of Bungay High School

**Comment ID**  
740

**Comment**  
Sport England support this policy in principle, as it will secure an extension to the playing fields (1-1.5 hectares) for the adjoining secondary school. The new playing fields will need to be provided to meet Sport England’s guidelines contained within our document 'Natural Turf for Sport' in order to ensure they are fit for purpose.

**Attached documents**
Suffolk County Council Robert Feakes

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 1630

Comment

• WLP5.2 (Page 111) – this site was not included at the previous Issues and Options stage. It will require planning applications to be supported by upfront archaeological assessment, and for consistency reference should be made in the supporting text and policy using Waveney's wording for this clause as adopted throughout. It is a large area that has not been systematically investigated, and includes cropmarks and recorded finds.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 1722

Comment Linked to adjacent site which does not appear to be designed for through route/ linkage

Transport Assessment required

Attached documents
### Suffolk County Council Robert Feakes

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP5.2 - Land Rear of Bungay High School</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1680</td>
</tr>
<tr>
<td>Comment</td>
<td>No risk of surface water flooding, however there appears to be no drainage strategy for the site - no watercourses or AW system. Soil conditions are variable in this location.</td>
</tr>
<tr>
<td>Attached documents</td>
<td></td>
</tr>
</tbody>
</table>
Suffolk Wildlife Trust James Meyer

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 1263

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Whilst we note that the proposed policy includes the retention of existing natural features as part of any planning application, without an understanding of the baseline ecological value of the site it cannot be confirmed that it is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Tim Basey-Fisher

Section  Policy WLP5.2 - Land Rear of Bungay High School

Comment ID  777

Comment  The proposed allocation of land to the rear of the Bungay High School is supported. The criteria requiring the site to be accessed via the land with planning permission to the east is supported. There are provisions in place for the allocation to be accessed via the planning permission land, both by vehicles and school buses.

Attached documents
Tracey Holmes

Section Policy WLP5.2 - Land Rear of Bungay High School

Comment ID 22

Comment I think that this number of houses in addition to those being proposed on the other side of the road is far too many for Bungay to sustain. It is already difficult to get an appointment at the doctors; the high school has recently reduced considerably the number of children it will take into the school; the primary school is bursting at the seams; we have only one supermarket. I have previously campaigned for a green space for children to play football - however would the one proposed here be

1. big enough

2. far away from housing so that the children can play without disturbing residents. There is no point in providing such an area if five minutes later the residents are complaining about footballs in their gardens!!

Attached documents
Strategy for Southwold and Reydon

Anonymous

Section  | Strategy for Southwold and Reydon

Comment ID | 368

Comment | All in favour of consultation and having a local plan. A shame that residents views and the AONB are being ignored re St Felix application which tends to bring whole process into disrepute and inspire a degree of cynicism.

Attached documents
Dexter Kirk

Section Strategy for Southwold and Reydon

Comment ID 343

Comment You ask that we be consulted but you make a mockery of what we really want i.e. you do not really mean it, you are just going through the motions.

If you really cared about us and our wishes you would never have approved the St Felix plan to build c.70 homes here, despite having identified enough space in Reydon for your new plan. Your approval rides rough shod not only over what we want but all the AONB, County Wild Life site rules etc. You really should be totally ashamed of how that planning meeting was conducted.

We are not stupid people, we are well qualified in what we do, have a world of experience between us and will fight you all the way on this issue.

Attached documents
Elaine Panther

Section  
Strategy for Southwold and Reydon

Comment ID  
347

Comment  
If these houses are supposedly going to help those who can't afford their own homes, how can this be guaranteed!

Also where is the work locally to support these houses or are they going to be second homes!!
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section  Strategy for Southwold and Reydon

Comment ID  1468

Comment  The First Draft Plan identifies Southwold and Reydon as one settlement for planning purposes. It states that there is little scope for further development in Southwold, due to significant constraints to development, and that the majority of local people therefore live in nearby Reydon. Southwold acts as an important tourism destination and as such demand for property and second homes is significant in both Southwold and Reydon. This demand has pushed up property prices above the level which many people who work in Southwold can afford and the town suffers from very high levels of in-commuting as a result. This is confirmed in the First Draft Plan which states that there are more jobs in the two settlements than working people who live there and that the majority of workers in Southwold and Reydon commute into the two settlements from elsewhere.

On the basis of the above, it is clear that Southwold and Reydon are a sustainable location for more development and that by increasing the level of proposed development in the town, the Council would help address local affordability issues and reduce the need for workers to live outside the town and commute in, resulting in a more sustainable pattern of development.

Attached documents
Kimberley Martin

Section | Strategy for Southwold and Reydon

Comment ID | 352

Comment | It is really a complete nonsense to build so many new houses in a village and area which is renowned for its tourism and scenery.

Southwold and Reydon must bring in a vast amount for Waveney Council's coffers. Do you really think it is a good idea to build homes that are not needed or wanted. That will flood the town of Southwold with more people shopping and parking, where are the tourists meant to park etc. You will kill the goose that lays the golden egg. Can someone with sense please stop this. St Felix also want to build 69 houses – poss 120 extra cars! Madness.

Attached documents
Michael North  
Artisan PPS Ltd (Leslie Short)

Section  Strategy for Southwold and Reydon

Comment ID 1491

Comment  
We note the strategy as summarised in outline on page 24 of the First Draft Local Plan document and subscribe to its principal conclusions. However, we believe that the focus and concentration of new growth in Lowestoft at 55% of the identified need with only 4% of it being accommodated in Southwold and Reydon as an imbalanced approach.

This imbalance is accentuated when due account is taken of the highly constrained and sensitive urban fabric of Southwold and the relatively few opportunities that there are within that built environment to deliver housing and/or for example, retail development.

The overall level of need for the sub area identified within the plan at 325 dwellings is addressed with an allocation of land for 250 dwellings in Reydon. It is obvious from the analysis within section 6 of the draft plan that significantly larger numbers of people work in this area than live there no doubt because of high local levels of high house prices readily evident in Southwold. It is highly relevant that for the first time, the Government propose to incorporate a locally based assessment of the affordability of new homes into the calculation of housing need. That can only result in significant increases in need over and above the 2017 figures identified in the PBA Assessment for Waveney when the Southwold factor in terms of affordability is taken into account. Moreover, there should be a greater emphasis on the ability of people being able to live in the area in which they work. The built environment of Southwold is so constrained and sensitive to further growth resulting in extraordinary levels of local house prices that it seems logical to provide for that further growth in nearby Reydon which has a far less sensitive existing urban fabric and surrounding environment. It also has the ability to absorb development on site such as 5/38 in Green Lane.
Attached documents
**Pamela Cyprien**

**Section** Strategy for Southwold and Reydon

**Comment ID** 1011

**Comment**

Whilst I recognise that further development in Reydon is inevitable, I believe that there is no current requirement for the proposed target of 325 houses, with 250 houses on the land west of Copperwheat Avenue (WLP6.1). I do not see in the Draft Plan any evidence that 250 units are needed on this site, nor does your Draft Plan take into consideration other developments which are either in the pipeline or quite advanced, ie:

- Pitches View & Green Lane (29 shared ownership/affordable units);
- former Southwold Hospital (4-6 units);
- former police and fire stations (about 20 units).

There is also the area beside the Sole Bay Health Centre, Reydon, which the NHS wish to put on the market, possibly for a retirement complex, and a further 69 units - should the proposed St Felix School development go ahead.

If all these units are taken into consideration, then the number of houses built on Site WLP6.1 will be significantly reduced. Consequently only part of the site would be required, thus there will be less impact on an AONB and on an already stretched infrastructure (sewerage and roads). Further dwellings could be built if, in the future, a need is identified.

The housing need in Reydon is for affordable housing and for 1-, 2- or 3-bedroom units and certainly not for second/holiday homes. Currently most houses, whether new build or old stock, that are put on the market, are sold for second/holiday homes.

**Attached documents**
Pamela Morris

Section: Strategy for Southwold and Reydon

Comment ID: 675

Comment: Delete all shaded areas in Reydon. It is an AONB. Housing development is not required; it would be destructive rather than an asset

Attached documents
<table>
<thead>
<tr>
<th>Pamela Morris</th>
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<td><strong>Section</strong></td>
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<tr>
<td><strong>Attached documents</strong></td>
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</tbody>
</table>
Reydon Action Group for the Environment Stephen Chessher

Section | Strategy for Southwold and Reydon

Comment ID | 1242

Comment | The only justification provided in the draft Plan for any significant growth in number of households in Southwold and Reydon is the perceived lack of affordable homes but no supporting evidence base is referred to in the draft Plan.

It is asserted at paragraph 6.1 that more people work in the area than live in the area. Not only is this inherently unlikely but the evidence base shows the reverse to be true. The Strategic Housing Market Assessment Pt 1 Table 3.14 shows 1,191 people working in Southwold and Reydon, ie only 32% of the population.

It is also asserted at paragraph 6.1 that there is a significant amount of in-commuting to Southwold from outside Southwold and Reydon. That may well be the case but no attempt has been made to quantify the degree of inbound commuting and no mention is made of the amount of outbound commuting (ie from Southwold and Reydon to other parts of Waveney or further afield). In the absence of any such estimates (both inward and outward), commuting should not be used as a factor to justify an increase in housing targets.

I have already noted that no significant growth in employment is envisaged for Southwold and Reydon over the Plan period (unlike Lowestoft and Beccles). So the planned increase in dwellings in Reydon will not be required because of new jobs. It may allow more people who currently work in Southwold and Reydon but live elsewhere to live locally. But the likelihood is that most new houses will be occupied by a combination of people who will work outside Southwold and Reydon; retirees which will further unbalance the population age distribution; and second homers and/or holiday lets. This can in no way be considered sustainable growth.

In the 2016 consultation, all but one of the proposed options for new housing distribution to Southwold and Reydon were 3%. In the absence of any justification for the 4% figure, it is difficult to escape the conclusion that
WDC has taken as its starting point the capacity of the preferred Copperwheat Avenue site referred to below (250 units) and worked backwards from that to arrive at the 4% target, i.e. the proposed distribution for Southwold and Reydon is supply led rather than demand led.

Attached documents
Reydon Action Group for the Environment Stephen Chessher

Section Strategy for Southwold and Reydon

Comment ID 1243

Comment There is no mention in the draft Plan of the vacant site adjacent to the Sole Bay Health Centre at Reydon which was previously intended for use as a care home. I understand that the site owner, NHS Property Services, has concluded that a care home is not economically feasible on this site and intends to seek planning permission for a retirement village or for general use. General use would presumably mean primarily market led housing development, possibly with some retail element. Either way, it appears that the site is likely to be available for housing and should therefore count towards the targets. Compared to possible alternative sites canvassed in the draft Plan, this site has the considerable advantage that it is at the centre of the village, adjacent to the Health Centre, pharmacy, public house and dental surgery and considerably more accessible on foot or cycle to the shops and other facilities of Southwold. It is well within the village settlement limits and suffers from none of the environmental drawbacks of the other alternative sites. This village centre site would be particularly suitable for one and two bedroom units of which there is an acknowledged shortage and would be suitable for relatively high density building which would quite likely support an enhanced affordable element in excess of 35%.

Attached documents
Reydon Parish Council Jean Brown

Section Strategy for Southwold and Reydon

Comment ID 1221

Comment 1. Housing Target for Southwold and Reydon

1.1 We note that the target of 325 new houses in Southwold and Reydon is an increase on most of the previously proposed options and represents almost 4% of the District total. It is, however, a considerably larger increase on the current housing stock of this area and, in particular, of Reydon where almost all the land available to develop is located.

1.2 We accept that the first stage consultation was largely in favour of more development in the market towns, villages and rural areas than most of the first stage options and that some growth is needed to maintain the vitality and sustainability of the community. However, housing growth in our area does not always achieve this as up to 50% of recently developed homes have quickly become second homes or holiday lets. Currently around 60% of the housing in Southwold falls into this category and around 25-30% in Reydon.

1.3 The argument for significant housing development in Reydon presented in the draft plan is that it will provide accommodation for those who currently work in Southwold and Reydon but cannot access housing here. This cannot be applied to the development of market housing. The pay levels in many of the key local employment sectors (tourism, retail, domestic services, building, fishing, boatbuilding and agriculture) are insufficient to allow these workers to access market housing at the level of prices locally which show no signs of easing due to the pressures of the second home market.

1.4 For this reason, it is essential that a high proportion of affordable housing is secured in any development in Southwold and Reydon, with the proposed 35% seen as a minimum (see below in comments on Policy WLP8.2). All three categories of affordable housing (rented, shared ownership and starter homes) must be protected in the medium and long-term and allocation criteria must give priority to those with a local
connection.

1.5 The draft plan states that the target of 325 will be "offset" by houses built or granted planning permission since 2014. This is shown to be 25 built and 50 committed and is a figure that we recognise and accept. However, it does not take into account other plans that are highly or quite advanced and will come forward before or shortly after 2018. These are:

• the development at Pitches View (6 shared ownership bungalows for older people)

• the development at Green Lane in Reydon (23 affordable units to be developed under the "Rural Exception Site" scheme)

• development of the former Southwold Hospital site (4-6 units)

• development of the former Police and Fire stations sites in Southwold (around 20 units).

These schemes will deliver around 55 further houses.

• In addition, then NHS has recently announced its intention to sell its land adjacent to the Sole Bay Health Centre for development as a retirement complex. This would provide at least 20 further dwellings for permanent residents. Regardless of the planning status of retirement housing, we believe that dwellings with permanent residents should count towards any total for development.

• The current application for housing at St Felix School, if approved, will bring a further 69 houses.

Taking this into account, the residual target for development in Reydon should be reduced to 175 or to 106 if St Felix is approved.

1.6 In our view, this figure of 106-175 should be the absolute maximum of further housing (beyond that already built or planned) which is allowed in Reydon in the period 2018-36 unless in the later years of the plan, housing need is identified which would justify the development of more affordable housing in rural areas on the edge of the settlement of Reydon (see below, comments on Policy WLP8.6). Our acceptance of this figure and the consequent incursion into the countryside and AONB is strictly conditional on the achievement of a minimum of 35% affordable housing in Reydon and the securing of a housing mix which is likely to produce market housing in reach of, at least, some of those living or working locally (see comments below on policies WLP8.1 and WLP8.2).
Attached documents
Sally Anfilogoff

Section  
Strategy for Southwold and Reydon

Comment ID  
750

Comment  
Alternative Sites

There is no mention in the draft Plan of the vacant site adjacent to the Sole Bay Health Centre at Reydon which was previously intended for use as a care home.

I understand that the site owner, NHS Property Services, has concluded that a care home is not economically feasible on this site and intends to seek planning permission for a retirement village or for general use. General use would presumably mean primarily market led housing development, possibly with some retail element. Either way, it appears that the site is likely to be available for housing and should therefore count towards the targets.

Compared to possible alternative sites canvassed in the draft Plan, this site has the considerable advantage that it is at the centre of the village, adjacent to the Health Centre, pharmacy, public house and dental surgery and considerably more accessible on foot or cycle to the shops and other facilities of Southwold. It is well within the village settlement limits and suffers from none of the environmental drawbacks of the other alternative sites.

This village centre site would be particularly suitable for one and two bedroom units of which there is an acknowledged shortage and would be suitable for relatively high density building which would quite likely support an enhanced affordable element in excess of 35%.
Sally Anfilogoff

Section Strategy for Southwold and Reydon

Comment ID 749

Comment Chapter 6 Strategy for Southwold and Reydon

The only justification provided in the draft Plan for any significant growth in number of households in Southwold and Reydon is the perceived lack of affordable homes but no supporting evidence base is referred to in the draft Plan.

It is asserted at paragraph 6.1 that more people work in the area than live in the area. Not only is this inherently unlikely but the evidence base shows the reverse to be true. The Strategic Housing Market Assessment Pt 1 Table 3.14 shows 1,191 people working in Southwold and Reydon, ie only 32% of the population.

It is also asserted at paragraph 6.1 that there is a significant amount of incommuting to Southwold from outside Southwold and Reydon. That may well be the case but no attempt has been made to quantify the degree of inbound commuting and no mention is made of the amount of outbound commuting (ie from Southwold and Reydon to other parts of Waveney or further afield). In the absence of any such estimates (both inward and outward), commuting should not be used as a factor to justify an increase in housing targets.

I have already noted that no significant growth in employment is envisaged for Southwold and Reydon over the Plan period (unlike Lowestoft and Beccles). So the planned increase in dwellings in Reydon will not be required because of new jobs. It may allow more people who currently work in Southwold and Reydon but live elsewhere to live locally. But the likelihood is that most new houses will be occupied by a combination of people who will work outside Southwold and Reydon; retirees which will further unbalance the population age distribution; and second homers. This can in no way be considered sustainable growth.

In the 2016 consultation, all but one of the proposed options for new
housing distribution to Southwold and Reydon were 3%. In the absence of any justification for the 4% figure, it is difficult to escape the conclusion that WDC has taken as its starting point the capacity of the preferred Copperwheat Avenue site referred to below (250 units) and worked backwards from that to arrive at the 4% target, ie the proposed distribution for Southwold and Reydon is supply led rather than demand led.

Attached documents
Simon Clack

Section
Strategy for Southwold and Reydon

Comment ID
1005

Comment
-in my opinion the decision taken in July 2017 by WDC’s Planning Committee to approve outline planning permission for the construction of 69 dwellings on site number 138 shown in the Options for the new Waveney Local Plan (the St Felix playing fields) has had the following effects: i/ it means that the New Local Plan for Southwold & Reydon is effectively redundant before it has been adopted and the time, money, and efforts of people such as yourself and local residents have been wasted; ii/ as the St Felix scheme is so egregiously inconsistent with most major planning policies and is opposed by the majority of local residents and local representative bodies, its approval will increase public cynicism about the planning system and thus further erode public participation in the consultation process; and iii/ given that the site at St Felix was included in the list of land for potential development in the original Options for the Waveney Local Plan, I would imagine that other landowners might be a little surprised that St Felix has been allowed to jump the gun;

-the draft local plan does not appear to contain any measures to tackle the extremely high levels of second-home ownership in the region and in the Southwold & Reydon area in particular. I'm not against second-home ownership per se but when it reaches the levels seen in Southwold (i.e. 36% of total dwellings) it has numerous distorting effects, one of which is to require Reydon to take up the burden of additional development;

-I'm not sure about your assumptions regarding inbound commuting to Southwold & Reydon. I know a number of people who work in Southwold & Reydon but have no desire to live in the area as they may have partners who work in other parts of the region, have children in schools outside the area, do not intend to stay in the area long-term, etc. Given the scale of the development proposed for Reydon in the draft local plan it would make sense to conduct a proper appraisal of commuter needs before using it as an argument for development;

-the draft local plan appears to make no mention of site 142 shown in the
Options for the new Waveney Local Plan (the Southwold Police Station and former Fire Station: 40 dwellings); Has it already been included in Existing Housing Commitments?

Ultimately, I believe that Southwold & Reydon's future housing needs are best met by the small-scale development of the various brown field sites that are likely to become available in Southwold & Reydon over the next few years, i.e. the land next to the new Health Centre in Reydon, the old Southwold hospital, the telephone exchange, the old Kings Head pub, etc, and various small infill developments. As a result, there would be no need to breach Reydon’s existing development boundary and develop AONB land.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Strategy for Southwold and Reydon

Comment ID 1174

Comment We note with concern that no specific justification is provided for the target of 325 new houses for Southwold and Reydon and it could as well be some other lower (or higher) figure. It is difficult to escape the conclusion that the ‘target’ is simply the arithmetical total of the proposed site at Copperwheat Avenue (250 houses) and the 75 houses built or granted planning permission since 2014. In other words, rather than start with an objectively assessed target and then consider the potential of sites available to meet that target, it appears that WDC has worked backwards from its preferred site to arrive at a target. In our view this completely undermines the target. We would like to see a detailed case, based on assessed housing need, for any proposed new housing in Southwold and Reydon, together with measures (see below) to prevent their use now or into the future, as second homes or holiday lets.

We also note that the target of 325 new houses is an increase on most of the previously proposed options and represents almost 4% of the District total. It is, however, a considerably larger increase on the current housing stock of this area and, in particular, of Reydon where almost all the land available to develop is located.

We accept that the first stage consultation was largely in favour of more development in the market towns, villages and rural areas than most of the first stage options and that some growth is needed to maintain the vitality and sustainability of the community. However, housing growth in our area does not always achieve this as up to 50% of recently developed homes have quickly become second homes or holiday lets. Currently around 60% of the housing in Southwold falls into this category and around 25-30% in Reydon.

The argument for significant housing development in Reydon presented in the draft plan is that it will provide accommodation for those who currently work in Southwold and Reydon but cannot access housing here. This is, at best, a highly arguable assumption. The pay levels in many of the key local
employment sectors (tourism, retail, domestic services, building, fishing, boatbuilding and agriculture) are insufficient to allow many of these workers to access market housing at the level of prices locally which show no signs of easing due to the pressures of the second home market.

For this reason, it is essential that a high proportion of affordable housing is secured in any development in Southwold and Reydon, with the proposed 35% seen as a minimum (see below in comments on Policy WLP 8.2). All three categories of affordable housing (rented, shared ownership and starter homes) must be protected in the medium and long-term and allocation criteria must give priority to those with a local connection.

The draft plan states that the target of 325 will be “offset” by houses built or granted planning permission since 2014. This is shown to be 25 built and 50 committed and is a figure that we recognise and accept. However, it does not take into account other plans that are highly or quite advanced and will come forward well before 2018. These are the development at Pitches View (6 shared ownership bungalows for older people), the development at Green Lane in Reydon (23 affordable units to be developed under the “Rural Exception Site” scheme), development of the former Southwold Hospital site (4-6 units), development of the former Police and Fire stations sites in Southwold (around 20 units). These schemes will deliver around 55 further houses.

In addition, a major Planning Application from St Felix school to develop 69 houses on one of its playing fields has been given provisional consent by Waveney Planning Committee. There remains considerable opposition to this scheme, including by the Society, and it is possible that the Planning Committee may be required to reconsider the matter due to issue raised by objectors. However, if this permission stands not only will there be a major extension of the settlement boundary into the AONB, but a further 69 houses will be developed in Reydon.

We note with surprise that WDC has not identified as suitable for housing the vacant site adjacent to the Sole Bay Health Centre and which was previously earmarked for use as a care home. We understand that the site is owned by NHS Property Services but that there is no demand for use as a care home and that it intends to market the site either for use as a retirement village or for general use which will presumably be mostly or entirely housing.

This site is in the centre of the village and suffers from none of the environmental drawbacks associated with the proposed sites outside the
village settlement limits. As such, it would be eminently suitable for relatively high-density housing comprising mostly or entirely smaller one and two bedroom units for which there is an identified need. This site could accommodate at least 20 units for permanent residents and, whatever the planning status of these units if they are part of a retirement complex, they should be counted in the Local Plan targets as dwellings for residents.

Depending on the number of units which may be provided by the site adjacent to the Sole Bay Health Centre, these sites can be expected to provide about 75 units or up to 144 units if the St Felix proposal is consented.

Adding these figures to the 75 houses already noted as built or with planning permission since 2014, there will therefore be between 165 and 233 new houses developed in Southwold and Reydon during the early period of this Local Plan which we believe may well be sufficient to meet local need. To clarify our calculations, we set these figures out in the following table.

<table>
<thead>
<tr>
<th>WDC Draft Plan Target</th>
<th>Known Plans</th>
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<tr>
<td>325</td>
<td>Green Lane</td>
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<tr>
<td>Built</td>
<td>23</td>
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<td>25</td>
<td>Pitches View</td>
</tr>
<tr>
<td>Committed</td>
<td>6</td>
</tr>
<tr>
<td>50</td>
<td>Southwold Hospital</td>
</tr>
<tr>
<td>75 new Houses: balance of target</td>
<td>250</td>
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</tbody>
</table>
Police & Fire Station

20

Land adjacent SB Health Centre

20

150 new houses: balance of target

175

Plan under Consideration

St Felix

69

219 new houses: Balance of target

106

Even if the proposed target of 325 houses to be developed in Southwold and Reydon is adopted, the balance of new development beyond what is currently known falls well below 250, to 106 (if St Felix proceeds) or to 175 if it does not. Particularly if the housing development at St Felix proceeds, we do not think that a second major new site for development in the countryside adjacent to the settlement of Reydon is justified.

If further assessed need for affordable housing emerges later in the period of this Local Plan, we believe that this could and should be met by small scale local development on the edge of the settlement under the policy WLP8.6, which should be extended to include Reydon for this reason.

Attached documents
Virginia Berridge

Section  Strategy for Southwold and Reydon

Comment ID  358

Comment  How does the strategy produced by Southwold Town Council fit with the Waveney Local Plan?

Is keeping St Felix going a legitimate planning objective? It would make a good set of buildings for conversion to affordable housing.

Attached documents
Infrastructure in Southwold and Reydon

Beccles and Bungay Cycle Strategy Ian Reid

Section  Infrastructure in Southwold and Reydon

Comment ID  1026

Comment  Welcome inclusion of:

* Improvements to the cycle network as identified in the Waveney Cycle Strategy

Attached documents
Elaine Panther

Section Infrastructure in Southwold and Reydon

Comment ID 348

Comment Shopping and schools need to be provided for the supposed influx of families.

Attached documents
G Duke

Section Infrastructure in Southwold and Reydon

Comment ID 895

Comment Your proposal of infrastructure improvements to playing fields and cricket wickets would provide minimum benefit to the majority of people living in the area. Infrastructure improvements would need to include road improvements, reliable and regular bus services, quicker access to the local doctors, and shopping facilities where goods on sale are reasonably priced and not priced at Southwold prices.

Attached documents
Mr and Mrs Goaman

Section  
Infrastructure in Southwold and Reydon

Comment ID  
353

Comment  
Concerns of access – roads

Traffic – provision of parking – pedestrian access e.g. children / dog walkers / bicycles.

School capacity

Lack of jobs

Too many properties proposed – already a lot of second homes and new builds 200 homes = 600 cars (+ tradesmen)

Attached documents
Southwold Town Council Lesley Beevor

Section Infrastructure in Southwold and Reydon

Comment ID 1558

Comment Besides water/sewerage, we need better cycling connections between Southwold and the villages it serves, especially Reydon. With all of the new housing to be built in Reydon, this could be an opportunity to revitalise our High Street with more people using it for ordinary needs. But this would, also, result in more cars coming into the town, unless people came by foot, bicycle or our local shuttle bus. The problem for cycling, and even comfortable walking, is the arterial Halesworth Road.

The housing for the west of Reydon, and the new St Felix housing proposals, could be linked to Southwold via a new cycle path tracking the road to Heathlands/footpath over Buss Creek and onto Blyth Road footpath. This would avoid the dangerous bit of the current cycle route over the Halesworth Road. CIL from Reydon developments could pay for this and the provision could go into Policy 6.1. This fits in well with the transport policies.

On foul water/sewerage, the Plan recognises that there are local issues, as does the WA in its consultation response:

Feedback from Anglian Water:

Suggests that there is limited capacity for combined sewers to accept new surface water flows from new development and that sustainable drainage systems should be the preference for dealing with surface water.

In talks with the LPA, STC representatives were informed that it was not within the powers of the DC to insist on improved provision of water services if the WA determined that current systems were adequate. The power lies with the WA to raise objections should it deem a scheme is unviable from a statutory point of view.
Sue Sweet

Section Infrastructure in Southwold and Reydon

Comment ID 370

Comment Southwold – "key infrastructure improvements" include 2 additional cricket wickets etc. Currently Southwold are considering relocating to Reydon!

Hotson Road tennis club lease is ending. Waveney have told club they will find them a new venue as they want to develop the site. No sign of a new housing development mentioned in your plans!?

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section | Infrastructure in Southwold and Reydon

Comment ID | 808

Comment | Measures to support the Suffolk Walking and Cycling Strategies and the Suffolk Nature Strategy could be incorporated into the infrastructure theme.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Infrastructure in Southwold and Reydon

Comment ID 807

Comment Suggest a more strategic approach to Green Infrastructure needs to be considered to integrate existing and new development with open spaces and countryside. The GI should also seek to provide landscape and wildlife enhancement in its design. Suggest there is a much wider remit to GI than the 2 'recreation' type facilities identified in 6.5.

Attached documents
Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Adrian and Julie Cooke

Section  
Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  
356

Comment  
Not suitable or adequate access to such a large development. It would significantly increase the number of 4-11 year olds in Reydon, and the local Primary School is already at maximum capacity. There isn't sufficient employment in the area to justify building the houses. However many new houses are built, there is nothing to prevent them from being sold on as holiday homes and therefore remaining empty for a large part of the year, as is the case with so many properties in Southwold and Reydon. 200 houses will probably mean an extra 400-600 cars using roads which are not suitable or wide enough for large volumes of traffic. 2 additional wickets for Southwold is hardly compensation for a huge development like this! How is the sewerage system going to cope with all these extra houses?

Attached documents
Anne Cornwall

Section  
Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  
366

Comment  
Feel that the amount of housing suggested – 250 is too large. Other plots 117, 118 and 138 are all part of the AONB and should not be included in the plan. Although 138 has just been granted OPP surely this makes a mockery of the whole consultation and AONB status development of this site would entail destruction of a protected holm oak and other areas of special interest. Problems too would be access onto the Halesworth Road.

Attached documents
Britt Palombo

Section  Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  841

Comment  I would just like to comment on the proposed building on Copperwheat field. Firstly I can't understand why build when there aren't many jobs round this area. It's seasonal work in Southwold but not many young people would like to live here.

And the entrance to the field (the road) is too small for building so many houses. It would be very dangerous to the people already living in the Closes, with lorries and building vehicles going past all the time. If the whole estate were built at the same time it would have made sense. If there are many houses built, it would be very noisy for a very long time for everyone nearby.

Kind regards Britt

Attached documents
Clive Tickner

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 453

Comment Does this plan to build houses here, west of Copperwheat, mean that the existing plan to build on the grey area off Green Lanes is now no longer going to occur? Also, why does Reydon have to be the location for Waveney housing when there are other sites, NOT AONB in the same catchment area. The massive field adjacent to the A12, travelling west, between the B1387 and Hazels Lane (to Wenhaston), on the north side of the road, has been for sale for years. Surely this could make a suitable site for a whole new community, such as has been accomplished, again, just on the A12 near Saxmundham, where a whole new conurbation is almost complete? Reydon has only two small shops and the access roads are small. The traffic implication (although your information page mentions the extremely hopeful comment of the residents merely walking and cycling), and the water supply and sewage implications for sure demonstrate that this area is inappropriate for such a huge plan.

Attached documents
Derek Self

My feeling to erect 250+ homes on this one site all in one foul swipe would be dangerous and have a massive detrimental impact on this particular area and the village as a whole. It would be virtually joining up already existing developments turning them into nothing more than a huge housing estate. Plus with the impact of a minimum of 500+ cars / vans exiting onto the Wangford Road out of the junction proposed would be madness.

Copperwheat Avenue in particular as early mornings can be a dangerous manoeuvre with the sun low in the sky and the speed of traffic rarely 30 or under. Coming from Southwold is difficult there has already been one fatal accident on that road because of the sun low in the sky we do not want any more.

Reydon is a lovely village to live in it has been carefully planned since 1950s retaining the village aspect, spread the impact of this amount of houses over other areas of the village as well, eventually uniting the church and old village again a unique opportunity. I believe dwellings are going up on part of area 5/38/36 an excellent idea.

I feel passionate about the village. Please do not spoil our village with one big housing estate build wisely and discretely, adding as we go along.

We all need to live somewhere so plan with the future in mind.

Attached documents
Environment Agency

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 873

Comment We support the policy to safeguard and enhance the character of the area of outstanding natural beauty. Any tree or hedge planting that is proposed should consist of native species.
G Duke

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 894

Comment We are writing to object to the proposal for a housing development of some 250 dwellings at land west of Copperwheat Avenue.

This site is a large greenfield site in an Area of Outstanding Natural Beauty and our understanding is that such sites should never be built on. In fact, the government's guidance states that these sites should only be built on in 'exceptional circumstances'. Here there appears to be no exceptional circumstances. To develop this site would have a negative impact on the primary purpose of the AONB which is to conserve and enhance the area's natural beauty. The scale of the proposed development would significantly reduce the tranquillity of the area, increase levels of noise and light, restrict star gazing, and result in a change in the landscape by urbanisation of the countryside.

There will also be adverse impacts on the local birds and wildlife. Additional buildings will have a devastating affect on views across to the historical church and its setting, and also impede the sound of the church bells ringing over the open fields.

Your proposal of infrastructure improvements to playing fields and cricket wickets would provide minimum benefit to the majority of people living in the area. Infrastructure improvements would need to include road improvements, reliable and regular bus services, quicker access to the local doctors, and shopping facilities where goods on sale are reasonably priced and not priced at Southwold prices.

Your comment that it will provide local homes for local people to allow people to work and live in the same area is somewhat questionable, particularly as there are only limited types of employment available in Reydon and Southwold.

Consideration should also be given to the impact this would have on safety issues on the surrounding local roads and the dangers of traffic travelling...
too fast in the 30mph zones. Each of the roads into Reydon, particularly the B1126 and B1127, are not sufficiently wide enough for two large vehicles to pass each other and any increase in traffic will exacerbate the situation. Drivers nowadays are not patient when behind a tractor or lorry and no doubt sooner or later overtaking will cause a serious accident.

If some development has to take place in Reydon and Southwold, there are other smaller sites, for example off Green Lane and Halesworth Road, which could provide some housing and have a much lesser impact. In Southwold itself, there appears to be a total three brownfield sites fronting Mights Road and the impact of developing these sites would be minimal, resulting in no loss of precious greenfield land.

I would appreciate an acknowledgement of our objection.

Attached documents
Ian Lomas

Section  Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  540

Comment  This would continue the encroachment of housing west into the countryside and should be reconsidered. If needed, housing could be built to the east of Reydon where it would have much less impact. Also Reydon has poor amenities and more housing would put additional pressure on these.

Attached documents
Jim Elmes

Section  
Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  
350

Comment  
Does this mean 250 houses in WLP6.1 or are the other developments in Southwold and Reydon to be included with that number?

Duncans Yard St Edmunds Rd

Might Road – Eastside

Police Stn + Fire Stn sites

Green Lane Reydon

Wangford Road opp Green Lane

If WLP6.1 is approved what are the access points for building Farm Close and the St Margarets Court, both through quiet housing. Access onto Wangford Rd through Farm Close is a blind access in both directions. Does Southwold and Reydon need all these homes – where will they work? Or will the be second homes with little benefit to the local area?

If the St Felix proposal is approved for 67 homes, does this also come off the 250 required?

Attached documents
John Reaney

Section: Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID: 605

Comment: This comment relates to the arable farming land referred to as 'site WLP6.1 - Land West of Copperwheat Avenue, Reydon.

The loss of this area of farmland to housing will seriously erode the rural quality of the western side of Reydon. Waveney DC states this is a fill-in development. However, clearly this is not the case as the northern boundary adjoins open countryside that links the fields behind St. Margaret's church across the Wangford Rd. The site forms an important link in the green space corridor that lies between the Halesworth Rd. and the Wangford Rd. to the west of Reydon.

The development of this site will lead to the loss of one of the prettiest footpaths in the locality. This path starts from the top of Keen's Lane and follows a line northwards until it reaches Reydon church. Along this path there is an ancient hedgerow where at the end there is a glade of trees containing a pond. Because this footpath is well away from any built up area, it is a wonderfully peaceful place to be, where one can listen to and observe the birds flitting from branch to branch amongst the oaks that grow amongst the hedgerows. This hedgerow and footpath will form the western boundary of the proposed development site and will, no doubt, end up being an alleyway following the backs of houses, while the pond will probably be filled in and the trees cut down.

To build houses on this site would represent a serious loss of amenity to the residents of Reydon and to visitors to the area. These houses are not required as I believe that all additional housing needs can be accommodated by utilising existing brownfield sites such as the redundant police station, fire station, garage and telephone exchange. Additional housing will place more strain on the existing sewage system which is reported by many to be inadequate even for present needs.
Attached documents
Julian Lawrence

Section          Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  419

Comment  Reydon/southwold plan seems okay if have to have more development than what is already going ahead, considering expansion of an area with limited transport, infrastructure and employment. To be fair think that most people expected the land marked had been already earmarked for development if any was needed and helps stop a sprawling intrusion into surrounding countryside as being contained within Reydons limits.

In general the local plan seems pretty fair all over the area. With most of the development in Lowestoft and Beccles which obviously have the best infrastructure to expand and more likely to be hubs for growth, with better networks for travel and more importantly employment.

Attached documents
Julie Church

Section
Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 436

Comment
Having lived in Reydon for over 45 years and seeing the vast change in the Village, I cannot express enough my concern in building hundreds of new homes. The population here is mostly elderly or second homes. There is nothing for young people and public transport is not good. There are no buses in the evening.

My main concern is the pressure it would put on our Surgery and Schools. It is not possible now to get an appointment to see a Doctor.

My main concern is the traffic coming into the village. The road into Southwold from Blythburgh is often grid locked in the summer or any holiday time. It is impossible to gain access from Keens Lane, either by car or even bicycle sometimes. The problem then extends to Southwold where there is just not enough parking. The cars coming into the Town have nowhere to go and have to drive around and around before giving up or parking away from the Town.

I ran a business in Southwold for over 25 years, and it became more and more difficult to park when coming to work at 9am. The car parks being full of holiday home cars left there for a week or more. I used to have shift working, but had to change that as it was impossible to come on the 12noon shift as parking was absolutely impossible.

Most of the older properties in Southwold and Reydon do not have any off road parking, and therefore have to park on the road. When these homes become holiday homes there can be as many as 4 to 5 cars per house.

The whole beauty of the area is the charm it holds and to build masses of houses on green fields, for them to be second homes does not seem a good idea. The second home people come for the scenic beauty.

Please think of our lovely area and the peace and harmony trees and green fields bring to all.
Attached documents
Michael North  
Artisan PPS Ltd (Leslie Short)

Section  Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  1492

Comment
In support of NRL’s objection and case to have sites 5/38 allocated for housing several primary evidential reports have been commissioned to establish the true nature of the existing constraints and opportunities that each of these sites presents. Consequently, this representation is supported by and analysis of heritage impact assessment, and ecological appraisal, and a landscape impact assessment. Below ground heritage is given primary desktop consideration supported by the evidence of recent evaluation on part of the site adjacent. Full reports are submitted and we draw the attention of the Council to their conclusions which seemed to be at odds with the superficial assessment given to sites no.5/38 in the initial sustainability appraisal/site assessment from which the First Draft Local plan has evolved. We seek dialogue and discussion with the Council to reconcile differences and to establish/narrow the issues between NRL and the Council, going forward.

There is an unjustified bias in the assessment of the competitor sites i.e. between the cited WLP6 .1 preferred site and sites numbered 5/38. For example, paragraph 6.2 of the FDP under plays the fact that both of the sites, preferred and omitted, are located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

The FDP claims that the preferred site ‘does not extend development further into the countryside to the west than existing development to the north and south’. The submitted landscape and visual impact analysis by NRL comes to a different, more balanced conclusion and in summary it might be said more reasonably, that in landscape impact terms, there is little difference between the two sites in this regard.

In summary, we say that the statement in paragraph 6.2 of the FDP that the development of the preferred site will result in a more limited impact on the landscape than other potential options for growth, is not supported by
detailed analysis and evidence.

A preliminary archaeological assessment was carried out by John Newman for NRL who in consultation with Suffolk County Council Archaeological service identifies the need for pre-development evaluation. We can only assume that the same will be required for the preferred allocation site. We do know that from trenching evaluation of the corner of site 5/38 conducted by Oxford Archaeology in 2017 that there was nothing found which prevents the site from being developed and it is therefore reasonable to conclude that it is unlikely that there will be any below ground heritage assets for the adjacent land which would prevent its development. We are not aware that any pre-development determination has been carried out for the preferred site or any reason why it should be considered in a different way in terms of a commitment to pre-development evaluation.

Similarly, there does not appear to have been any detailed heritage impact consideration of the proposed development on the setting of listed buildings and in this case the nearby St Margaret’s Church lying to the west of both sites.

The submitted Bob Kindred Heritage Impact Assessment in relation to a proposal to develop sites 5/38, identifies quite clearly and reasonably concludes that there will be no impact upon views of or from St. Margaret’s Church arising from the development of this land. Whilst a similar assessment of the preferred site is currently being carried out by Bob Kindred for NRL, our landscape assessors advise that the church is much more visible in the landscape from the preferred site than it is from sites 5/38 and thus the impact will be more significant from the development of the preferred site.

A preliminary ecological appraisal of sites 5/38 by MHE Consulting is submitted with this representation. The summary conclusion of that report is that there are significant opportunities for enhancement and biodiversity creation arising from any proposal to develop land together with its strategic, structural landscaping proposals, albeit that such works are primarily works of mitigation in which the opportunity will be taken to enhance habitat and increase biodiversity.

Waveney District Council’s Draft HRA Screening Report has concluded no likely significant effect as a consequence of the proposed housing allocations in the consultation version of the new Local Plan. It is unlikely that this conclusion can be substantiated and it is inconsistent with HRAs for other Local Plans in Suffolk and elsewhere.
With respect to compliance with the Habitat Regulations there is no reason why sites 5 and 38 at Reydon should not be included in the District’s housing allocation through to 2034.

In summary conclusion, therefore we say that the allocation of land on site WLP6.1 for 250 dwellings represents a major incursion into a valued landscape and will result in the loss of agricultural land at 12.24 ha which is potentially significant. There is no evidence presented nor any analysis undertaken to establish whether or not the preferred land to be lost is Grade 3a or another grade and therefore within/without the category of best and most versatile land. Whilst at this point in time, because the NRL agricultural land classification soil analysis is not yet complete, we can say that the soil type is most likely to be similar to that of the allocated site, what we can also say is that the preferred site measures approximately 8.75ha whilst the allocated site preferred site is clearly much larger and therefore as appropriate, potentially represents a greater loss of agricultural land which may be of the best and most versatile category.

In landscape terms, it would be sensible to bisect and reduce the allocation WLP6.1 and reduced it by approx. by 50% to follow the line of the existing development boundary to the north and south of the preferred site and thereby represent more of a rounding off of the existing western settlement edge of Reydon village.

The LSDP submitted landscape impact assessment report’s conclusions are set out in section 4 of the Report. The Council's assessment of sites 5/38 has been fundamentally disproved.

In terms of a sustainable location the land at sites 5/38 is just as conveniently accessible as is the preferred site in terms of its access via cycling and walking modes to local schools, services, shops and facilities in both Reydon and Southwold.

Para. 6.8 of the FDP infers that the allocation of the preferred land presents 'a unique opportunity to secure land for the relocation of properties at risk from coastal erosion'. That opportunity of course is not unique as the delivery of land for 7 replacement houses can be achieved anywhere, including on sites 5/38.

Para 6.9 of the FDP infers that the landscape impact of the proposed development of the site has not been considered in any detail which is in stark contrast to the landscape and visual assessment conducted for sites 5/38 by LSDP. The landscape strategy arising from the combined baseline evidence and assessments of Ecology, Landscape and Heritage from which
flows the suggested Masterplan block layout for sites 5/38 within this submission illustrates the point that not only has impact been thoroughly considered in principle, but the results have been applied to the site specific requirements required to successfully integrate the development of sites 5/38 within the local landscape whilst simultaneously presenting significant opportunities for both enhancement to biodiversity and wildlife habitats and to public accessibility to quality open space.

Moreover, Sites 5/38 is capable of delivering a broad range of housing types, mix and density in accordance with section 6 of the National Planning Policy Framework (Delivering a wide choice of high quality homes) and also has the scope for delivering community facilities such as a Nursery (Use Class D1) (we note an existing shortage of preschool nursery places in the locality) as well as some food retail provision commensurate with the retail catchment area requirements of Reydon. For example, a Local food store of approximately 300m² of convenience retail floor space could be successfully accommodated within the site on the frontage to Green Lane.

Para 6.10 of the FDP notes the presence of a grade 2 listed building at Gorse Lodge within the vicinity of the allocation and simply indicates that any new development will need to respect the setting of it 'as much as is practical.' The duty of a Local Planning Authority in such circumstances and the weight to be attributed to the protection of heritage assets including their setting is well-known and is rehearsed in the NRL Heritage Impact assessment submitted within this representation. There is no sound reason why the assessment of the impact of development from the preferred site on Gorse lodge should be any less thoroughly executed and considered than is the case for sites 5/38 on a St. Margaret’s Church. Indeed, the preferred site's impact on the same church should also be considered as we conclude that the development of the preferred site will have a greater impact than any arising from the development of sites 5/38.

At Para 6.12 of the FDP, we note that there is nothing either exceptional or unique about the essential requirement to provide appropriate infrastructure, including open-space and children's play areas as part of normal residential development of an appropriate scale. Just as it is required for the preferred site, so too can it be provided on sites 5/38 but our combined baseline assessments (landscape, ecology and heritage) which identify opportunities as well as constraints, provide for a positive well planned series of open spaces connecting with the adjacent development area and integrating with the wider countryside and built edge of the village, providing a successful transition between the two (see
Master plan layout).

In summary conclusion, we invite the Council to reconsider its position with regard to the allocation of site WLP6.1 and to reconsider the merits of allocating sites 5/38.

Attached documents
Mr & Mrs McNally

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 504

Comment We do not agree that the proposal for 250 houses by Copperwheat Avenue is necessary and will cause to the local residents and the environment.

(1) We understand from one of your Planning Officers that Anglian Water admit there are issues with the sewerage pipes as they are inadequate. Why are you planning to build more houses before resolving this problem.

(2) There is only a small need for housing for local people. If others come into the area where are they going to work as there are no jobs locally.

(3) We wait three weeks for a doctor’s appointment now, how much longer will be wait with hundreds more people living in the area.

(4) Nearest shops are in Southwold where it is impossible to park now so there will be a further burden on road users.

(5) The building of extra houses will be in Reydon why cannot some of the free land in Southwold be used (e.g. old fire and police stations)

(6) Access out of Copperwheat Avenue onto Wangford Road will be dangerous for another 500 cars (with at least 2 cars per house)

(7) Building houses just because that it your brief is detrimental to everyone, existing residents and new residents where there is insufficient infrastructure to support it. One of your planning officers admitted at the meeting that planning works in a silo. Would it not be better if you helped to work with other departments to solve all the problems. This would mean you would build useful housing to help everyone have better lives and not just meet your targets and move on to the next project having ruined so many lives.

Attached documents
**Pamela Morris**

**Section** Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

**Comment ID** 676

**Comment** Reydon, Copperfield Avenue area might be considered for a few houses. The area you specify is too large and the number of houses too great.

Large numbers of houses are not needed nor could the area sustain them; it is out of proportion. The infrastructure would also be upset.
Philip Midgley

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 349

Comment This is a very large development proposed for Reydon. The need for such a development is questionable given the few being allocated for people who live and work in the area. As with all recent developments in Southwold/Reydon the overwhelming majority are purchased as holiday rentals and not for local people. The result is leading to the area becoming a virtual ghost town out of season and will lead to businesses becoming unsustainable and employees having to travel increasing distances to work in the area. The continuing negative effect on the SSSIs of the area will likely also harm a major part of Waveney's tourism industry.

The demand for construction of large numbers of dwellings appears to be driven mainly be a top down ill-though policy from Central Government without any consideration of genuine local need. This is forcing Waveney into building unnecessary and inappropriate schemes such as this proposal for Reydon that will harm the community and add nothing to the local area or benefit genuine locals housing needs that would likely only be properly addressed through more council houses.

The local infrastructure in Reydon is not able to support or cope with such a massive development.

Attached documents
R A Palombo

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 374

Comment After having looked through all the information provided by you, it seems to me that this area is not as suitable for development as other smaller development may have the desired effect of providing "affordable housing" without creating a large housing estate in an area which to date has been renowned for its quiet and countrylike feel.

The access point to Wangford Road at Copperwheat Ave is also on a bend which at best can be described as "dangerous" and to plan for an increase in traffic on this road will be very disruptive for the people who already live there.

Perhaps it would be a more village friendly way of achieving the Council's housing targets by smaller developments on other smaller sites throughout Reydon.

The village should be enlarged by smaller developments north along Wangford Rd towards sites 5, 38 and 26 and historically the village of Reydon should spread along this road, if at all, as the village originated toward the church & church hall.

Attached documents
Reydon Action Group for the Environment Stephen Chessher

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1244

Comment
Neither this site nor its constituent parts (sites 189 and 202) were included in the original (2016) consultation. It is surprising, to say the least, that a site which was not previously the subject of consultation has now become WDC's preferred mega-site intended to accommodate all planned growth for Southwold and Reydon for the entirety of the Plan period.

No attempt has been made in the draft Plan to justify the need for this mega site which is intended to provide 250 houses. In my view, it is unnecessary for the reasons I have already set out above.

This site is outside both the current and proposed settlement limits and on open farmland in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.

It is acknowledged at paragraph 6.7 of the draft Plan that all of the landscape surrounding the settlement is sensitive to development but no account appears to have been taken either of NPPF paragraph 116 (a development of 250 houses would undoubtedly be major development in the AONB) or of WDC's own evidence base.

I refer you to the Settlement Fringe Landscape Sensitivity Study dated December 2016 prepared for Great Yarmouth BC and WDC by Chris Blandford Associates which is intended to inform consideration of possible development immediately outside existing settlements for the Local Plan.

All of the Reydon ‘fringes’ including this site are categorised as of low landscape sensitivity but very high landscape value and low landscape capacity. Low landscape capacity is defined on p5 of the Study as follows: 'The landscape is assessed as having high landscape sensitivity and high landscape value. Large or medium-scale new development is likely to erode the positive key features and characteristics of the landscape which are desirable to safeguard in line with relevant national/local planning policy objectives. Taking into account site specific constraints, there may be
potential to accommodate some small-scale development in specific locations within the landscape with lower landscape sensitivity, subject to appropriate siting, design and landscaping mitigation’ Small scale development is defined as 10 or less residential dwellings, medium as 11 to 50 and large as over 50. It is difficult to understand why WDC considers that this site is suitable for 250 dwellings when the Council’s own consultants conclude that it is suitable for no more than 10. Further, it is asserted at paragraph 6.7 of the draft Plan that this site ‘will not encroach further in to the countryside to the west than what is already established by development to the north and south’. That assertion is simply wrong as a glance at the map on p115 will show. It is also a considerable exaggeration to suggest that the site is 'located within convenient walking distance of services in Southwold. The overwhelming likelihood is that the vast majority of journeys made to Southwold will be by private car and this proposed site would become a non-descript dormitory housing estate. In conclusion, this site is both unnecessary and unsuitable and should be rejected.

Attached documents
2. Policy WLP6.1 – Land West of Copperwheat Avenue

2.1 We accept the designation of this area as an area for development. It has been previously planned for development and the adjacent roads were clearly planned to allow expansion to the west of the existing area of settlement. Although in the AONB, we accept that it is not a particularly sensitive site and its development would create a coherent new boundary of the settlement. However, allowing development here will be a significant incursion into the AONB and, if the St Felix application is allowed this will be a second major incursion into open countryside which should be protected as far as possible.

2.2 Moreover, if our calculations above are accurate, this site will need considerably fewer than 250 houses. Therefore, we consider that a reduced area of the field should be identified as a site for development or a reduced density permitted (or a combination of both). This would allow for increased emphasis in the policy on landscaping, provision of open space and ample gardens.

2.3 The policy is silent on design (though it would be subject to the provisions of policy 8.29) and we think that this is a missed opportunity. Here we would like to see the encouragement of some aspects of the local Suffolk vernacular (red brick, simple facades, weatherboarding black pantile roofing etc) or more modern variants of the theme using materials and a palette which reflects the surrounding countryside. Above all, further expansion of the village of Reydon must not appear as further suburban sprawl or pastiche designer homes.

2.4 Finally, there are two issues of infrastructure which are of considerable local concern:

• The local sewerage system shows regular signs of severe strain, unacceptable air pollution and discharge of foul water into local dykes. This
is now acknowledged by Anglia Water. The policy for this development should make explicit provision for the necessary improvements to the sewerage infrastructure and the capacity of the treatment works so that these works become a required condition of any subsequent planning permission.

• Traffic access should establish at least two routes of ingress/egress and make any necessary modifications to the junctions from the existing roads onto the Wangford Road. (There are similar concerns about traffic access onto the Halesworth road if the St Felix application is permitted.)

Attached documents
Roger and Sally Cracknell

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 507

Comment Section 6.6/6.7

Whilst we agree that the site so identified is the most appropriate within the settlement, we are confused by the rejection of land market 138 on the plan (St Felix School Playing Field), which is already the subject of a planning application which has been approved, for 69 houses. This seems to contradict the rationale for the use of the Copperwheat Avenue site. There is no specific reference to the inclusion or otherwise of the 69 in the 250 for the Copperwheat Avenue site. Are you able to clarify please?

What is the situation regarding the number of houses approved in other parts of Southwold and Reydon, e.g. Green Lane, and the 250 for Copperwheat Avenue?

We support the proposed access to the site via St Margaret’s Crescent, particularly in terms of pedestrian and vehicle safety when turning on to and off the Wangford Road.

Section 6.9/6.10/6.11

There is a lack of information about the housing mix both in terms of types of house (flats, terraces, semi-detached, detached) and also whether or not any social housing for rent/shared ownership is to be included. We note and approve comments in the Summary Plan about the desirability of affordable housing for people who work in the area. Affordable as a technical term is a proportion of the going market rate which is high in Reydon. We believe a mix of properties in both social/private ownership and housing styles is desirable. We'd like to see some housing for rent.

We would like to see Waveney taking a proactive role in trying to prevent second/holiday homes, on this development, perhaps using models from other parts of the country e.g. Cornwall.

Section 6.12
We agree that a play area adjacent to the existing play area at the end of Barn Close (accessed by a path alongside our house) should be developed to the south and overlooked to provide more supervision.

Infrastructure Issues

We support the creation of a transport and travel plan for the proposed development. 250 houses with say, 2 cars per house, means, potentially, 500 additional vehicles on the Wangford Road on a regular basis. Some regular reliable public transport will be essential.

We would also want you to consider sewage provision in terms of impact on existing main sewage pipes. There are times in the summer when visitor numbers swell the population of Southwold and Reydon. We feel that the existing systems are struggling to cope. At times the smell in some areas is most unpleasant. Can we have a public presentation on the proposed sewage situation so that we can understand Anglian Water's plans going forward.

Attached documents
Sally Anfilogoff

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 751

Comment Policy WLP6.1 Land West of Copperwheat Avenue, Reydon

No attempt has been made in the draft Plan to justify the need for this large site which is intended to provide 250 houses. In my view, it is unnecessary for the reasons I have already set out above.

This site is outside both the current and proposed settlement limits and on open farmland in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.

It is acknowledged at paragraph 6.7 of the draft Plan that all of the landscape surrounding the settlement is sensitive to development but no account appears to have been taken either of NPPF paragraph 116 (a development of 250 houses would undoubtedly be major development in the AONB) or of WDC’s own evidence base.

I refer you to the Settlement Fringe Landscape Sensitivity Study dated December 2016 prepared for Great Yarmouth BC and WDC by Chris Blandford Associates which is intended to inform consideration of possible development immediately outside existing settlements for the Local Plan.

All of the Reydon ‘fringes’ including this site are categorised as of low landscape sensitivity but very high landscape value and low landscape capacity.

Low landscape capacity is defined on p5 of the Study as follows:

‘The landscape is assessed as having high landscape sensitivity and high landscape value. Large or medium-scale new development is likely to erode the positive key features and characteristics of the landscape which are desirable to safeguard in line with relevant national/local planning policy objectives. Taking into account site specific constraints, there may be potential to accommodate some small-scale development in specific locations within the landscape with lower landscape sensitivity, subject to
appropriate siting, design and landscaping mitigation'

Small scale development is defined as 10 or less residential dwellings, medium as 11 to 50 and large as over 50.

It is difficult to understand why WDC considers that this site is suitable for 250 dwellings when the Council’s own consultants conclude that it is suitable for no more than 10.

Further, it is asserted at paragraph 6.7 of the draft Plan that this site 'will not encroach further in to the countryside to the west than what is already established by development to the north and south'.

That assertion is simply wrong as a glance at the map on p115 will show.

It is also a considerable exaggeration to suggest that the site is 'located within convenient walking distance of services in Southwold. The overwhelming likelihood is that the vast majority of journeys made to Southwold will be by private car and this proposed site would become a non-descript dormitory housing estate.

In conclusion, this site is both unnecessary and unsuitable.

 Attached documents
Sally Macnab

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 357

Comment Land (Copperwheat) already planned to have houses but the number seems a lot. Suggested plots 118 and 117 should not be used as this is the entrance to Reydon and Southwold (also AONB). Iconic to every trip to the area.

Attached documents
Simon Clack

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1010

Comment - whilst the choice of the Land West of Copperwheat Avenue in Reydon seems the lesser of all the evils in terms of the future expansion of Reydon, the size of the proposed development (250 dwellings) seems out of all proportion to the existing "village" as well as its infrastructure, its facilities, and its employment opportunities.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1175

Comment Our comments on this policy must be seen in the context of the arguments set out above that there is no case for a new development of 250 houses in Reydon.

That said, we accept there is a case for designation of this site (or part of it) as a potential area for development. It has been previously planned for development and the adjacent roads were clearly planned to allow expansion to the west of the existing area of settlement. Although in the AONB, we accept that it is not a particularly sensitive site and its development would create a coherent new boundary of the settlement.

However, we also note that designation of this site falls foul of the recommendations contained in the Settlement Fringe Landscape Sensitivity Study report which is part of the evidence base commissioned by WDC. This states clearly that the landscape capacity is low with capacity only for some small-scale development defined as 10 or less residential dwellings.

However, if our calculations above are accurate, this site will need considerably fewer than 250 houses. Therefore, we consider that a reduced area of the field should be identified for development or a reduced density permitted (or a combination of both). This would allow for increased emphasis in the policy on landscaping, provision of open space and ample gardens.

We note that Site 202 identified at the Options stage of this process, which is the southern part of this site, would accommodate 112 dwellings which is within the range of houses needed as we have shown. This may therefore be the most appropriate part of this site to be identified in this policy.

The policy is silent on design (though it would be subject to the provisions of policy 8.29) and we think that this is a missed opportunity. Here we would like to see the encouragement of both of low carbon impact design elements and some aspects of the local Suffolk vernacular (red brick, simple...
facades, weatherboarding black pantile roofing etc) or more modern variants of the theme such as the use of materials and a palette which reflects the surrounding countryside.

Finally, there are two issues of infrastructure which are of considerable local concern:

The local sewerage system shows regular signs of strain and this is now acknowledged by Anglian Water. The policy for this development should make explicit provision for the necessary improvements to the sewerage infrastructure and the capacity of the treatment works.

Traffic access should establish at least two routes of ingress/egress and make any necessary modifications to the junctions from the existing roads onto the Wangford Road.

Attached documents
Stuart Blanchard & Wendy

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 614

Comment I am writing to voice my concerns over the above development on the following grounds:

* Also the proximity of the homes to the back of Barn Close and Farmland close, these homes enjoy farmland views and would be concerned if the dwellings were built within very close proximity to the existing homes.

* The size of the homes is a concern as recent local developments have sought planning permission for three storey houses which will completely overshadow the existing neighbouring properties.

* The Sole Bay health centre has recently declared in the Southwold Gazette that the surgery is almost at full capacity now and constantly busy.

* We understand that 250 houses are planned for this development which is completely out of proportion for the village, and I would object to this.

* We are extremely concerned over the amount of traffic using Copperwheat Avenue or St Margaret’s court to service the development.

* We are concerned that the utilities and amenities may be unable to cope with such a large amount of new development in this area.

* The Other concerns are over the potential owners of the properties as Reydon seems to becoming a second home overspill for holiday home owners that are unable to buy a property in Southwold, and not able to bought by local people.

* There may be other areas and developments that may be more suitable.

Attached documents
Sue Sweet

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 369

Comment If this goes ahead where will access be – surely not on Wangford Road –
one way leads to windy lanes one way leads to bottleneck / accident prone
"Reydon Corner".

Surely given the small roads it would be better to have several small
developments than one big one (e.g. Green Lane / along Halesworth Road).

I am really struggling to believe a lot of the information because of the
following.

My house (and 4 neighbours) do not figure on your plan. We have lived
there for 3 years and on the plan all I can see is a green field – our
protected oak tree is not marked.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 792

Comment 6.7 Remove reference to 'surrounded' by the Suffolk Coast & Heaths AONB. Reydon is within the AONB.

Development of a 12.24 hectare site is likely to result in proposals which are considered to be major development. Development proposals for this site would be contrary to section 115 of the NPPF and would need to satisfy the tests of NPPF section 116. This is likely to be problematic.

Notwithstanding the above concerns, if the Plan intends to allocate this site, there are additional elements to be considered.

Potential impact on the landscape and special qualities of the AONB resulting from development will need to be fully assessed. A Landscape and Visual Impact Assessment will be required and this should inform measures to mitigate any adverse impacts associated with the development as well as measures to offer enhancement to the landscape character.

Development should aim to conserve and enhance the landscape character associated with the AONB within which the site sits.

Development should not only retain the existing public rights of way, but should enhance them and ensure that there is connectivity between the site and surrounding path network.

Add detailed expectations ref. the provision of affordable housing

Add detailed expectations ref. the design, quality and adoption of sustainable building principles.

Open space requirements may need to take into account necessary mitigation ref. recreation disturbance on nearby European Designated Sites (Special Protection Areas), therefore we suggest that this amount may need to be revised following screening for Habitats Regulations Assessment.
Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1631

Comment • WLP6.1 (page 116-7) - this site was not included at the previous Issues and Options stage. This site will require planning applications to be supported by upfront archaeological assessment, and for consistency reference should be made in the supporting text and policy using Waveney's wording for this clause as adopted throughout. It is a large area that has not been systematically investigated.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID  1723

Comment  Improvements to The Crescents and Wangford Road Ped crossing required
          Transport Assessment required

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1649

Comment Policy 5 of the Minerals Core Strategy safeguards sand and gravel resources identified using data available from the British Geological Survey. The County Council will safeguard any site within the identified minerals consultation area from proposed development in excess of one hectare or areas falling within 250m of sites within the Specific Site Allocation DPD. The following allocations are larger than one hectare and within the consultation area, however this is no reason to prevent the allocation of these sites as the County Council believes it to be unlikely that these sites would be exploited for minerals. The County Council will still need to be consulted as the minerals planning authority if planning applications do come forward on these sites, and would request consideration is given to using some of the on-site mineral resource in any resulting development, to reduce the amount of material transported on and off the site.

- Housing Allocation Policy WLP6.2

Attached documents
Suffolk Wildlife Trust James Meyer

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1264

Comment This site has not been subject to wildlife audit and therefore its current ecological value has not been established. Without an understanding of the baseline ecological value of the site it cannot be confirmed that the site is appropriate for allocation for development. We recommend that further ecological assessment is undertaken at this site prior to determining whether it is appropriate for allocation.

Notwithstanding the above, should the site be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
Taylor

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<th>Section</th>
<th>Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon</th>
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| Comment ID | 622 |

| Comment | I approve of the proposed Allocation WLP6.1. It has far less negative impact than any of the alternatives. |

| Attached documents |  |
Virginia Berridge

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 359

Comment It is odd to identify the site for housing and then give permission for housing on a totally different site.

Attached documents
WM Denny & Son Ltd Graham Denny

Section Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon

Comment ID 1196

Comment

I am writing to make some comments about Policy WLP6.1 of the Draft Local Plan.

It states under Infrastructure Para 6.5 Utilities "Localised improvements to the sewerage network". This is of particular concern because some 30 years ago the sewerage infrastructure was considered by many, especially developers, to be very close to being inadequate at that time. During the last 30 years very little if anything has been done to the sewers but new properties have continued to be built which would indicate that the sewers are not really fit for purpose despite what Anglian Water says. One aspect on which Anglia Water needs to be scrutinised is their pumping station at the bottom of Three Marsh Lane.

Looking at some developments which have been carried out in the Waveney area in the last 15 years it would seem that the quality of design has suffered. Properties appear to be built with inadequate storage space which results in garages being used for this purpose resulting in more and more cars being parked on the highway. The size of the garages which are being provided may also be contributing to this factor because they are very often not large enough to accommodate present day vehicles, even small models.

The inclusion of affordable homes should be incorporated with sensitivity and imagination. Not just "dropped in" as it would appear was done at the Hopkins Homes site off the Wangford Road in Reydon.

Attached documents
Policy WLP6.2 - Southwold Harbour

Environment Agency

Section Policy WLP6.2 - Southwold Harbour

Comment ID 874

Comment The policy correctly states that development should not affect the structural integrity of a flood defence and may require a permit under the Environmental Permitting Regulations 2010. It should be noted that permits are required if work is undertaken within 8 metres of a fluvial main river or flood defence and 16 metres of tidal waters or associated flood defence..

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP6.2 - Southwold Harbour

Comment ID 1223

Comment 3. Policy WLP6.2 Southwold Harbour

3.1 We believe this policy is inadequate, partly because it deals only with Southwold Harbour itself. This policy needs to provide a planning framework for an overall strategy for the whole of the Blyth Estuary, much of which is in Reydon. This strategy, based on the work of the Blyth Estuary Group, should aim to preserve the current shape of the estuary by appropriate works to the banks and control or reduction of the tidal prism through encouragement of silting and of the development of tidal saltmarshes in front of the estuary walls. The planning policies must allow preparation for foreseeable tidal surge incidents by integrated measures to deal with flooding. This should include policies to allow:

- further raising of the estuary walls,
- measures to be taken by residents and businesses in Southwold Harbour to make their premises more flood resilient
- appropriate developments of jetties and pontoons so that they can cope with surge events.

Attached documents
Simon Flunder

Section Policy WLP6.2 - Southwold Harbour

Comment ID 986

Comment I have specific comments to make about the Section in the Plan in connection with Southwold Harbour. I welcome the general intent on developing the Harbour but consider Policy WLP6.2 Southwold Harbour is inadequate. It needs to be set in the context of an overall policy for the whole of the Blyth Estuary which aims to preserve the current shape of the estuary by appropriate works to the banks and prepare for foreseeable tidal surge incidents by integrated measures to deal with flood tides, including planning provision to allow measures by residents and businesses in Southwold Harbour to make their premises more flood resilient and to allow appropriate developments of jetties and pontoons.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP6.2 - Southwold Harbour

Comment ID 1177

Comment We believe this policy is inadequate. It needs to be set in the context of an overall policy for the whole of the Blyth Estuary. This must aim to preserve the current shape of the estuary by appropriate works to the banks and prepare for foreseeable tidal surge incidents. This must comprise integrated measures to deal with flood tides, including planning provision to allow measures by residents and businesses in Southwold harbour to make their premises more flood resilient and to allow appropriate developments of jetties and pontoons.

Attached documents
Southwold Town Council Lesley Beevor

Section  
Policy WLP6.2 - Southwold Harbour

Comment ID  
1569

Comment  
Design should include any development of fishermen's huts, not just replacement. When there are vacant sheds, which are clearly redundant to the marine industry, the STC wants to ensure that they contribute to a thriving harbour economy through use as artisan workshop spaces and in a way that does not alter the character of the area as a working harbour.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Policy WLP6.2 - Southwold Harbour

Comment ID 800

Comment Add to: proposals for replacements huts and other buildings on either side of Southwold Harbour. This should be extended to include all development proposals to cover other matters such as change of use of fishing huts, installation of external lighting, proposals serving on-water activity etc.

We do not concur with the statement that the poor condition of the byway 'contributes to the character of the area'. Some measures to manage the way the access is used could result in overall enhancement in this special location - further investigation required ref. current use and the extent to which private rights of access by vehicle are exercised. The status of restricted byway does not allow for a public right of vehicular access. Balancing requirements for legitimate access for businesses but ensuring that public through traffic is not permitted.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP6.2 - Southwold Harbour

Comment ID 1724

Comment Unlikely to significantly impact upon highway

Attached documents
Strategy for Rural Areas

Bourne Leisure Ltd (Lichfields) - Lichfields (Sian Davies)

Comment ID 1476

Comment

Bourne Leisure supports the structure of the Draft Local Plan, in that it includes a separate Vision for Rural Areas (page 24) and a full section which sets out the 'Strategy for Rural Areas' (Section 7). This approach aligns with national policy, which states that local planning policy should support economic growth in rural areas, in order to create jobs and prosperity by 'taking appositive approach to sustainable new development' (NPPF, para. 28). However, the Company has the following comments on Section 7 and the related 'Rural Areas' Vision:

1. The difference between 'Rural' and 'Countryside' needs to be clarified in the. As referenced in the comment above, draft Policy WLP1.3 (Settlement Boundaries) states that 'settlement boundaries are defined on the Policies Map. Land which is outside of settlement boundaries and allocations in the Local Plan and Neighbourhood Plans is considered as the Countryside'. It is clear from the Policies Map that Gunton Hall is located outside of a settlement boundary; the Hotel is therefore located in the 'Countryside'. Corton Coastal Village is identified to be located within the settlement boundary of Corton on the Policies Map; therefore, the Holiday Village is not classified as being within the Countryside.

In contrast, the Draft Local Plan categorises the Corton Settlement to be 'Rural'; the 'Corton Strategy' is included within Section 7 'Strategy for Rural Area'. Presumably, therefore, the Council considers there to be a difference between what is meant by 'Countryside' and what is meant by 'Rural'. However, this difference is not made clear in the draft document, and, as a consequence, the Spatial Strategy for the District is not clear. For instance, it is particularly unclear whether Section 7 'strategy for rural areas' also relates to areas classified as 'Countryside'. Therefore, to accord with national policy, which states that Local Plans should set out a clear,
consistent strategy for development management (NPPF, para. 154), Bourne Leisure request that the areas that are considered 'Rural' in the District are made clearer in the pre-submission Local Plan.

2. Notwithstanding the above, Bourne Leisure is concerned that the supporting text for 'Strategy for Rural Areas' at page 121, as well as the Vision for 'Rural Areas' at page 24, is too focused on the provision of housing. This is at the expense of recognising the importance of supporting vital economic industries, such as tourism in rural locations. As referenced above, the NPPF identifies supporting tourism in rural locations to be a key way to establish a strong rural economy and provide local employment. Bullet point 3 of paragraph 28 of the NPPF specifically states that local plans should 'support sustainable rural tourism and leisure developments that benefit businesses in rural areas...'. Therefore, to ensure consistency with national policy and to support the findings of the Employment Land Needs Assessment Update 2017 (para. 1.11 Draft Waveney Local Plan, as referenced above) the Company suggests the following additions:

Paragraph 7.1: 'The strategy for the rural areas is to deliver approximately 12% of the District's housing growth, supported by infrastructure, tourism development, small scale employment, and retail and leisure development.'

'Rural Areas' Vision (page 24): '...New development in rural villages will have increased the coverage of high-speed broadband. The District will have a strong rural tourism industry which continues to attract a wide range of visitors and provide employment for local people.'

3. The Company supports the indirect recognition of the importance of Corton Coastal Village at paragraph 7.36 of the Draft Local Plan, which states:

'Holiday accommodation is located along the coast and provides an important focal point for tourism in the local area.'

In order to ensure that the Holiday Village continues to provide an important focal point for tourism, it is important to allow such businesses to develop and expand so that they can continue to attract visitors. Therefore, to ensure consistency with paragraph 28 of the NPPF (which supports the provision and expansion of tourist and visitor facilities in appropriate locations) the Company requests that the Council recognises this through the following addition to paragraph 7.36:

"Holiday accommodation is located along the coast and provides an
important focal point for tourism in the local area. Proposals for new accommodation and the expansion of/improvements to existing accommodation will be supported in this location.'

Attached documents
S Read
Marrons Planning (Jenny Keen)

Section  Strategy for Rural Areas

Comment ID  1495

Comment  Paragraph 7.2 of the FDP states that, "new housing development in rural settlements will primarily be delivered through housing allocations (494 dwellings). These will be supplemented with sites that come forward that have not been allocated but may comply with other policies in the Local Plan. These are referred to as 'windfall sites'." We wholly support and endorse this statement. We also support the approach identified in paragraph 7.4 that, "The overall objective of the rural strategy is to deliver development that reflects the character of a rural settlement and contributes towards sustainable development that will support their needs and enable them to grow and prosper in the long term. Most new housing development is identified through site allocations both in this Local Plan and in Neighbourhood Plans, however, District-Wide Strategic Planning Policies will support planning decisions related to residential proposals on sites not allocated in the Local Plan."

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<th><strong>Simon Phillips</strong></th>
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Comment ID 993

Comment 3.0 Comments on Section 7 Strategy for Rural Areas

Rural Settlement Hierarchy

3.1 The consultation document (pages 121 and 122) confirms the strategy for the rural areas to deliver approximately 12% of the district's housing growth across rural communities.

3.2 Importantly it also acknowledges that "in recent years there has been limited development in the rural parts of the District" and this has been the case in Somerleyton.

3.3 The Somerleyton Estate supports the District Council in acknowledging this fact and through the proposed rural strategy reflecting Government policy to boost rural housing supply to make rural communities more resilient and sustainable.

3.4 The consultation document proposes a Rural Settlement Hierarchy to distribute the district's 12% of housing growth to the most appropriate rural settlements.

3.5 Table 2 (page 122) sets out the types of development that will be appropriate in both 'Larger' and 'Smaller' villages and this includes sites allocated in the local plan as well as allocations set out in neighbourhood plans.

3.6 The Somerleyton Estate supports the flexibility being given to neighbourhood plans, should they chose, to 'go beyond' the local plan and allocate more or different sites to meet local needs.
South Norfolk District Council Adam Nicholls

Section Strategy for Rural Areas

Comment ID 1592

Comment

- The strategy for rural areas to deliver a small element of the District’s housing growth is welcomed and it is pleasing to see that this is planned to be supported by appropriate infrastructure, employment and retail and leisure development as this is particularly important to ensure the long-term sustainability of rural communities. The majority of this rural growth will be on allocated sites but the plan is sufficiently flexible to allow some non-allocated growth in certain circumstances and this is clearly set out in Table 2 at para 7.4.

- A couple of sites (in Lound and Willington) are allocated for 10 dwellings. It might be worth considering increasing this number to 11 in order to generate an affordable housing obligation, if total floorspace exceeds 1,000 sq. m, although it is recognised that the Lound site might be too small to do this.
Suffolk Wildlife Trust James Meyer

Section Strategy for Rural Areas

Comment ID 1265

Comment With the exception of site WLP7.4 (Land North of Pickwick Drive, Blundeston), none of the rural sites have been subject to wildlife audit and therefore their current ecological value has not been established. From the information available some of the sites appear likely to have ecological value and without an understanding of this baseline it cannot be confirmed that they are appropriate for allocation for development. We recommend that further ecological assessment is undertaken at the proposed sites prior to determining whether it is appropriate for them to be allocated for development.

Notwithstanding the above, should the sites be allocated it must be ensured that the any planning application is supported by an appropriate ecological assessment and that the design of any development avoids or mitigates any ecological impacts and secures significant ecological enhancements.

Attached documents
The Morton Partnership Ltd Ian Miller

Section Strategy for Rural Areas

Comment ID 965

Comment I also note that a number of villages to the north of Halesworth also have a number of new properties proposed although there is no particular reference as to why these satellite sites have been selected. For some of the villages selected, there are fairly significant increases in dwelling numbers proposed within the village.

We have been working with Clients in this area and feel a more sympathetic approach would be to allow up to say 10 No. dwellings within the remote village locations, but to more villages than currently proposed. This no doubt would have a lesser impact on both services, infrastructure and the inhabitants by diluting the effect of the major intrusions currently proposed and should be considered as "small scale residential development in the countryside."

It would also offer local people housing within their local area, thereby attempting to keep people and services within the villages.

[see submission of alternative site for consideration at Spexhall]

As a local employer and knowing the need for additional housing in the area, I trust you will review this case along with no doubt others that are to be considered, and try within the new Local Plan to spread the requirements for housing across the local area and not over populate Halesworth.

Attached documents
Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Ashby, Herringfleet and Somerleyton Parish Council S H Read

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<th>Section</th>
<th>Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth</th>
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<td>Comment ID</td>
<td>527</td>
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<tr>
<td>Comment</td>
<td>The Parish Council broadly supports the concept of the Rural Strategy delivering 12% of the necessary housing. However it has concerns about the number of homes allocated to Somerleyton within the Plan period.</td>
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<th>Section</th>
<th>Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth</th>
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<tr>
<td>Comment ID</td>
<td>1122</td>
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<td>Comment</td>
<td>The above Policy states that the village of Wrentham is classified as a Larger Village in terms of the Council’s settlement hierarchy within this Plan. This is supported.</td>
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| Attached documents | }
As set out in response to Policy 1 above, it is considered necessary for all suitable settlements to play a role in securing the delivery of overall housing needs. It is welcoming that the Council has acknowledged the need to consider the need to protect and support the existing services within its rural settlements and it is therefore important that the Local Plan is pro-active in encouraging net improvements to sustainability through the delivery of improvements to community infrastructure and services of this nature.

The settlement boundaries and associated policies within the plan currently fail to take account of the balance between the intrinsic character and beauty of the countryside and the need to ensure that rural communities can continue to thrive. Whilst the intrinsic character and beauty of the Countryside should be recognised, this should be balanced against ensuring the wider economic, social and environmental well-being of rural settlements can be secured through positive plan-making. Indeed, it should be a prerequisite for the Plan to enable all residents to have access to the highest quality community facilities. To achieve this in a sustainable manner, it is essential that the local plan’s evidence base sets out an accurate baseline position and that the policies of the Plan have the ability to maintain and improve the sustainability of settlements to support all of its communities over the plan period.

In particular, local plans must avoid the creation of a sustainability trap whereby smaller and rural communities are considered as unsustainable in principle. The Plan contains no mechanism by which a settlement that is assumed to function at a lower level within the hierarchy can migrate up the sustainability ladder and in doing so achieve a key element of the vision that is contained within the Plan for the needs of residents to be met in terms of access to quality facilities, retail and housing.
Attached documents
Comment ID 1463

Comment

In addition to the issues identified above regarding the Council’s unrealistic approach to development in and around Lowestoft, we wish to raise an objection to the Council’s strategy for development in Rural Areas. Policy WLP1.1 states that the rural areas will accommodate 12% of total housing growth or 963 new homes. We consider that this would result in an unsustainable pattern of development that would promote a reliance on travel by private car and would result in significant levels of growth in the smaller villages that would have a disproportionate impact on the character of these settlements.

The overall approach to housing development in Rural Areas, as set-out in Section 7 of the First Draft Plan, is considered to be positive in that it encourages development that enhances the vitality of rural settlements and reflects their character. However, the implementation of this approach in terms of the number of dwellings proposed to be allocated to the smaller villages is clearly not sustainable. As an example, the following smaller villages are proposed to accommodate major developments despite having very few facilities and none of them having a village store or post office:

<table>
<thead>
<tr>
<th>Village</th>
<th>Existing No. ofDwellings</th>
<th>Proposed No. NewDwellings</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ilketshall St Lawrence</td>
<td>79</td>
<td>27</td>
<td></td>
</tr>
</tbody>
</table>
+34%
Ringfield
137
44
+32%
Willingham
135
40
+30%

It should be clear from the above that these villages are too small to accommodate the level of development proposed in them and that as a result there will be significant impacts on their character. We wish to object to the proposed distribution of development in rural areas and consider that 5% of the total level of growth, as suggested by Alternative Option 4, with additional growth allocated to the market towns would result in a much more sustainable pattern of development.

In terms of the most sustainable locations for growth within the Rural Areas, we are aware that several of the Rural Area villages are more sustainably located than others and we consider that those with good access to public transport, and especially those with railway stations, should receive growth above less accessible settlements.

Attached documents
Jenny Sheahan

Section Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Comment ID 667

Comment Whilst I understand that new housing has to be distributed across the District, additional housing in very small villages such as Mutford must be handled very carefully. Mutford has no public facilities aside from a village hall. There is no shop, Post Office, or bus service - however many of the people who have moved to the village in the last 5-10 years have done so exactly because of the rural seclusion.

Permitting new 3-4 bedroom homes, which will presumably house families, will bring additional traffic to lanes which are already under stress from existing cars and the significant volume of agricultural traffic (especially going to the Bio Mass centre in Ellough industrial estate). All new properties should require a minimum of 2 car spaces off-road, to alleviate the problem on on-road parking further exasperating the traffic problems.

I do agree with the need for some additional 1-2 bedroom homes - especially if they are for local/older people.

Attached documents
Section Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Comment ID 931

Comment Policy WLP7.1 – Rural Settlement Hierarchy and Housing Growth

It is noted that only 12% of growth is allocated to rural areas. It is considered that the inclusion of a greater number of allocations across the District, including, small and medium sized sites in the rural settlements, will increase housing delivery, and provide more certainty for local communities and developers.

It is unclear at this stage how effectively the development strategy will actually deliver a consistent level of housing growth sites, which are developable with a reasonable prospect that they are available and could be viably developed, over the plan period. The plan places a significant reliance on strategic sites which are notoriously slow to deliver and face significant challenges in terms of their ability to frontload infrastructure. Further small and medium size allocations will be necessary to bring forward sites early in the plan period to maintain housing supply. The implementation of the Plan will be at risks of not maintaining a five-year housing land supply. The situation can quickly alter in relation to the five-year housing land supply and the Council needs to be ambitious and flexible in its housing allocations.

Corton is identified as a 'Larger Village'. These are to be 'The focus for growth in the rural areas.' This is supported, however, no housing has been allocated in Corton. The policy states that 963 dwellings are to be provided within the Larger Villages. Corton has a good range of facilities which include the primary school. Its range of services and facilities is greater than other settlements such as Barnby and Cove, or Blundeston, neither of which has a shop. Despite this, no housing has been allocated to the settlement. It is our view that Corton could accommodate a minimum of 100 dwellings, including our client’s site. On this basis we object to Figure 19 and
paragraph 7.37 showing Corton as having no housing allocations.

Attached documents
Section Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Comment ID 1496

Comment Table 2 identifies the strategy and mechanism for delivering housing in rural areas. In respect of the Countryside including hamlets and scattered communities, we specifically support and endorse the mechanism of securing development through allocated sites in the Local Plan and through small scale development in accordance with Policy WLP8.7.

However, with reference to paragraph 7.5, whilst we agree that, in terms of sustainability, the larger villages should accommodate the most development and the smaller villages can accommodate a slightly lower level of development, we do not concur that development in the rest of the Countryside should rely solely on compliance with specific development control policies. Rather, it is submitted that where there are clearly deliverable sites coming forward in the plan process (through representations made) and these are deemed appropriate for development by the Council (and thus can suitably be allocated for development), the Council should be supporting these sites by allocating them in the emerging Local Plan. The NPPF is clear in its overarching aim that, "local planning authorities should positively seek opportunities to meet the development needs of their area" and is also clear at paragraph 154 that, "Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where." Whilst we appreciate that there should still be a strategy in place for future sites coming through as windfall sites, it remains that where there are clear development opportunities now that could be developed quickly, these should be identified in the plan. This would therefore be consistent with the NPPF and the key message from the Government that planners should be speeding up the planning process and positively promoting development that is deemed appropriate. In line with paragraphs 14 and 15 of the NPPF, to allocate such land for development now will ensure no unnecessary delays in the decision taking process.
Consequently, whilst we agree with the overall approach to development in rural areas as set out in WLP7.1, we strongly submit that development in relation to the Countryside should not solely rely on sites coming forward through Neighbourhood Plans and windfall sites, but where there are suitable, available and deliverable sites now, these should be allocated in the emerging Local Plan alongside other sites identified in the larger and smaller villages.

Attached documents
Simon Phillips

Section Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Comment ID 1052

Comment I support WLP7.1

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth

Comment ID 994

Comment Draft Policy WLP7.1 Rural Settlement Hierarchy and Housing Growth

3.7 Draft Policy WLP7.1 sets the rural settlement hierarchy and divides the rural settlements into two categories; 'Larger Villages' and 'Smaller Villages' with the larger villages expected to accommodate 70% of rural housing development.

3.8 Somerleyton village has been classified as a 'Larger Village' due to the extent of facilities and services it features. The Somerleyton Estate support the settlement hierarchy and the inclusion of Somerleyton village in the 'larger village' category within draft policy 7.1.

Larger Village Allocations

3.9 Figure 19 of page 124 of the consultation document sites out the number of homes allocated to the larger villages in the draft plan.

3.10 Somerleyton village is allocated 55 dwellings in the draft plan and this is supported by the Somerleyton Estate.

Attached documents
Sotterley Estate Tom Barne  
Evolution Town Planning LLP (Steven Bainbridge)

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP7.1 - Rural Settlement Hierarchy and Housing Growth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>1427</td>
</tr>
</tbody>
</table>

**Comment**

Draft Policy WLP7.1 sets the rural settlement hierarchy and divides the rural settlements into two categories; 'Larger Villages' and 'Smaller Villages' with the smaller villages expected to accommodate 20% of rural housing development.

Willingham (Shadingfield and Willingham St. Mary) village has been classified as a 'Smaller Village' due to the extent of facilities and services it features. The Sotterley Estate support the settlement hierarchy and the inclusion of Willingham village in the 'smaller village' category within draft policy 7.1.

**Attached documents**
The consultation document (pages 121 and 122) confirms the strategy for the rural areas to deliver approximately 12% of the district's housing growth across rural communities.

Importantly it also acknowledges that "in recent years there has been limited development in the rural parts of the District" and this has been the case in Willingham.

The Sotterley Estate supports the District Council in acknowledging this fact and through the proposed rural strategy reflecting Government policy to boost rural housing supply to make rural communities more resilient and sustainable.

The consultation document proposes a Rural Settlement Hierarchy to distribute the district's 12% of housing growth to the most appropriate rural settlements.

Table 2 (page 122) sets out the types of development that will be appropriate in both 'Larger' and 'Smaller' villages and this includes sites allocated in the local plan as well as allocations set out in neighbourhood plans.

The Sotterley Estate supports the flexibility being given to neighbourhood plans, should they chose, to 'go beyond' the local plan and allocated more or different sites to meet local needs.
Barnby and North Cove Strategy and Site Allocations

Barnby Parish Council Jayne Evans

Section Barnby and North Cove Strategy and Site Allocations

Comment ID 891

Comment Introduction

Barnby Parish Council held two Parish Meetings to discuss the Waveney Local Plan. These meetings were held on Monday 28 August, and on Monday 11 September (as a Public section within the scheduled Barnby Parish Council meeting).

Approximately 30 Parishioners attended on both occasions, although there was some overlap in attendees between the two dates.

Feedback on Plan

The responses are summarised in the following table. Where an item of feedback was unanimous, it has been recorded as 45 attendees agreeing (see estimated numbers above):

Feedback on Plan specific to Policy WLP 7.2

Approximate number of attendees agreeing

Access to the A146 main road from Barnby needs to be improved, preferably with a roundabout at the eastern exit from the village by Barnby Garden Centre

45

The proposed site (WLP 7.2) is broadly acceptable to Parishioners, although some living near the site expressed a preference for one of the rejected sites.

30

There was an almost unanimous view that concentrating development on the WLP 7.2 site would be preferable to splitting the sites, as it would allow
infrastructure problems to be addressed, and also deliver Section 106 and/or Community Levy funds in more usable amounts. It would also limit development beyond 45 houses due to the boundaries of the site, which would not be the case if other sites were developed.

Finally, bus and cycle routes, and the A146, are easily accessible to the WLP 7.2 site.

The mix of 35% affordable housing and 65% larger houses described in the Plan was broadly supported, although it was noted that development over the past 20 years had been mainly of large houses which do not fulfil the needs of the village.

There is concern about the site identified as "90" to the south of the village on the border with North Cove. There is an appeal in progress on the site and it is possible that a significant number of houses may be approved on this site. The concerns are that this will result in considerably more houses being built in the next 20 years than the 45 envisaged in the Plan. Parishioners seek assurance that this will not occur.

Access to the site WLP 7.2 should not be from The Street, but from the small part of the road which runs south before meeting the A146. This is because access from The Street would exacerbate the existing congestion on The Street, particularly around school opening and closing times.

There were concerns about the practicalities of providing 15 extra places at Barnby School.

Parishioners were very concerned that the infrastructure is inadequate to support 45 more houses, in particular:

The sewerage system is inadequate and discharges foul sewerage onto the
marshes at times of overload, including some Sites of Special Scientific Interest (SSSIs).

This must be addressed before the new development takes place.

45

The electricity supply in the village adjacent to the site WLP 7.2 is inadequate, and there are frequent power cuts.

This must be addressed before the new development takes place.

45

The gas pressure is often low, and a gas main is situated under the proposed development site.

This must be addressed before the new development takes place.

The road around the Clearview cul-de-sac frequently floods.

20

There was concern about loss of arable land, albeit of fairly low quality, and loss of habitat and biodiversity

10

Feedback concerning The Street, which runs past the proposed site

Parishioners welcomed the improvements to The Street noted in the Plan, and requested the following:

There were requests to incorporate better parking for Barnby Primary School into the plans to upgrade The Street.

45

The existing trees on the south of The Street should be retained within the plans to landscape the frontage to The Street.

This is separate from the site specific criterion in the Plan to retain the trees to the south side of the planned site, bordering the A146

10

There should be minimal disruption to the existing National Cycle Route 30 during the building work
The requirements for off-street parking for the new development were welcomed.

The plan to create an acoustic barrier was welcomed, but it was felt that vegetation alone would be insufficient as the traffic is very noisy on the A146, because of the type of road surface.

There were requests to site single storey houses along The Street, with two-storey houses nearer the A146. This would improve the look of the site. This is in line with WLP 7.2

Consideration needs to be given to the provision of bus stops for both east and west-bound buses.

There were some non-local comments:

**Feedback on Non-Local aspects of Waveney Local Plan**

**Approximate number of attendees agreeing**

The number of new homes required in the Waveney Local Plan was questioned because there are 11,000 empty houses at present in the area.

The distribution across the area was questioned on the basis that Lowestoft could be considered underpopulated, and increasing the Lowestoft allocation might revitalise the centre in terms of the shopping amenities. This would reduce pressure on Beccles and villages such as Barnby. Beccles in particular is felt to be congested at times.

There should be a by-pass of the A146 "Barnby Bends", starting at the proposed new roundabout (see above) and finishing at Carlton Colville.
Barnby Parish Council has considered the feedback from Parishioners noted above. The Council is in agreement with the comments.

North Cove Parish Council Jayne Evans

Section  Barnby and North Cove Strategy and Site Allocations

Comment ID  1268

Comment  Barnby and North Cove are 2 separate villages with their own parish councils and churches why are they presented as one in this draft plan?

Attached documents
Paulette Pitcock

<table>
<thead>
<tr>
<th>Section</th>
<th>Barnby and North Cove Strategy and Site Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>130</td>
</tr>
<tr>
<td>Comment</td>
<td>Issues with site selection</td>
</tr>
</tbody>
</table>

North Cove Parish Council opposed the development and Barnby Parish Council added that the site was too large and should be a separate entity and NOT accessed through the village also that the size of the development should be reduced so the existing properties would not be adversely affected. It would appear that your desire to build in this location disregards the opinion of both parish councils.

With the large developments proposed for the Ellough/Worlingham area it would seem that this small scale build is totally unnecessary being placed on high grade agricultural land which offers the village of Barnby a light and open aspect which is appreciated by all residents.

The development will generate difficulties with access onto and from the A146 and will also increase the already troublesome issue with parking along the area of 'The Street' surrounding the Primary School.

I have read with interest the consultant's comments in the commissioned Settlement Fringe Study which indicated that the area was of moderate landscape sensitivity and just a short way along the road in Swan Lane 'the limited tranquillity of the site' due to its proximity to the A146 was reason NOT to continue with a similar development. This reasoning will also apply to site ref Policy WLP7.2 as the site is affected by the same issues.

One aspect which is extremely concerning is the issue of both sewerage and 'soak away' issues. It is stated that new sewage flows should be diverted to Beccles Water Recycling Centre but it is my understanding that this is also at full capacity. The new build houses within Barnby are constructed so that rain water is left to soak back into the soil and our particular road 'Clearview' has an individual issue in that rain water pools at the end of the close where it meets The Street forming a flood in some heavy rain. I personally have contacted the Highways department as I thought the street...
drains were blocked but I was advised they were not and the flooding would subside slowly as it drains into the field which is proposed for development. This issue will need rectifying if proposed housing causes the field in question to be prevented from absorbing surface runoff. Suffolk in general is an area of scarce water and concreting over valuable open fields which absorb rain does not sound viable.

North Cove Primary School will have to be enlarged to accommodate an influx of new pupils and with budgets at an all time low where will the capital come from to increase the present buildings? The new housing may result in parents have to drive their village children to surrounding schools where there is a greater pupil capacity.

Attached documents
WLP7.2 - Land between The Street and A146, Barnby

Barnby Parish Council Jayne Evans

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 1237

Comment Specific views on Waveney Local Plan

The Council is in agreement with the site identified in WLP 7.2, as it would allow infrastructure problems to be addressed, and also deliver Section 106 and/or Community Levy funds in more usable amounts. It would also limit development beyond 45 houses due to the boundaries of the site, which would not be the case if other sites were developed.

Finally, bus and cycle routes, and the A146, are easily accessible to the WLP 7.2 site.

The Council seeks assurance from Waveney District Council that development in the Parish will be limited to 45 houses in the next 20 years. With respect to the appeal currently under way for Site "90", Barnby Parish Council is now of the view, supported by Parishioners, that this should not be upheld, and that new development should be on the preferred site identified in WLP 7.2 to the south of Barnby Primary School. If the development of Site "90" is approved, Barnby Parish Council would expect a proportional reduction in the housing on Site WLP 7.2.

The mix of 35% affordable housing and 65% larger houses described in the Plan was broadly supported, although it was noted that development over the past 20 years had been mainly of large houses which do not fulfil the needs of the village.

Access from Barnby and North Cove is already very difficult at times, and there have been deaths on the A146 related to the poor access. Frustrated drivers are frequently observed to take risks at the junctions, and some very poor driving is noted at times. Barnby Parish Council is united in a commitment to better access to the A146, probably in the form of a roundabout located adjacent to Barnby Nursery. Although the Council understands that this would not be formally provided by Waveney District
Council, Barnby Parish Council requests that Waveney District Council supports this request as strongly as possible, and that Waveney District Council acts as a partner alongside local Parish Councils in any future project to achieve this end.

The Council is clear that infrastructure improvements need to be made before the new development takes place, because infrastructure is inadequate for the existing housing. This comprises:

- Improvements to the sewerage system
- Improvements to the electricity supply
- Improvements to the gas pressure
- Improvements to road drainage.

Access to the site WLP 7.2 should not be from The Street, but from the small part of the road which runs south before meeting the A146.

This is because access from The Street would exacerbate the existing congestion on The Street, particularly around school opening and closing times.

Concerning the improvements to The Street, Barnby Parish Council welcomes and supports the measures identified in WLP 7.2. In addition, the Council is very concerned that the development should add to the visual appeal of the village, rather than detract from it. This would include frontages onto The Street being set back; being in keeping with the local style; being lower height; and with off street parking.

The Council also supports the conservation of the existing trees along the Street as part of the re-landscaping. Better parking for Barnby Primary School would be very welcome. Consideration needs to be given to the provision of bus stops for both east and west-bound buses.

Barnby Parish Council requests that these items of feedback are considered, and included within the final version of the Waveney Local Plan.

The Council would value comments from the Planning Department on this feedback.
Batchelor

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 135

Comment This is a village not a town! Half the number proposed would be more acceptable I suppose as we keep being told we need more houses for the growing population.

Our road junctions are hazardous to get out on, with the few people that already live here now, there will be more likelihood of accidents on the A146.

Our services will be stretched (drainage mainly), what few we have left anyway. As we have lost our shop and Post Office.

Attached documents
Beccles and Bungay Cycle Strategy Ian Reid

<table>
<thead>
<tr>
<th>Section</th>
<th>WLP7.2 - Land between The Street and A146, Barnby</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>1020</td>
</tr>
</tbody>
</table>

**Comment**

This seems to be the most suitable site for additional housing in Barnby. However, The Street is part of an existing Cycle Route (Route 30) which takes cyclists (but also pedestrians) away from the busy A146. Any development of the site alongside the A146 must ensure that the existing safe cycle route is not compromised. To this end, access to the site should preferably be from the connection road to the A146 rather than from The Street.
Chris and Pam Benning

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 642

Comment

1. Regards 'The Street'. Having been advised the field in Swan Lane was turned down on the width of the road (correctly so), the Highways Dept should be aware of the following:

2. Although The Street is wider, it is also far busier. Village and School traffic, plus the X22 bus route. With the problems the bus has now, with the commencement of the development they would be unable to travel freely without severe delay. From what I am being advised this would lead to using the same route as the X2, continuing on the A146. Also the school buses would find the same problem. This being the cast everyone would have to travel to the bus stops by the Barnby Nursery. Not ideal for those in North Cove.

3. Exit from The Street onto the A146 is highly dangerous now, let alone after any developments either in Barnby or East and West of the village. Slow the traffic to 40mph on the Barnby North Cove area may help but a roundabout is most urgently required. (Check accidents/fatalities) Not good reading.

4. Field (WLP7.2). Please note this is being utilised. In recent times Sheep grazing, Potato crop and a Cereal crop plus Winter silage. Another rotation crop expected.

5. Where will the surface water go (the field is the soak away currently).

6. If the development goes ahead, where will the construction vehicles access and exit the site?? This should not be on The Street (this could save the bus route) The construction vehicles would be better directed on and off the site via the A146, leaving The Street clear for local and school traffic plus no, repeat no , development debris.

7. If the development goes ahead what times will they commence and finish daily?
Attached documents
Christine Ambrose2

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 602

Comment Should this housing allocation go ahead, it is important that access to the site is not via The Street, which is a narrow road and already dangerous to school children and motorists emerging from the junior school, Clearview and Welbeck Close*.

A new roundabout is desperately needed at the A146 exist just beyond Welbeck Close (diagram enclosed). A new spur road should be added to the new roundabout leading onto the new development, giving access to lorries etc. This would keep any extra traffic away from The Street which is already congested with local traffic, cyclists, young children from the school and their parents, both on foot and in cars.

*Whether or not the housing allocation proceeds.

Ian Bond

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 1080

Comment

Although I am a councillor on Barnby parish council I would like to state that the following is my view and not intended to represent the views of Barnby parish council.

With regard to the proposed site WLP7.2, I feel that there are a number of factors that support this selection.

The size of the site and the suggested housing density will limit the number of units developed to 45, avoiding a need for additional sites, or the possibility of land banking causing "mission creep" on a larger site.

The site proximity to the A146 will allow for traffic to be taken directly into the site, keeping additional traffic in the village to a minimum and away from unsuitable village roads.

Although most services are available on or near the site the suggested upgrade for sewage can be installed with a minimum disruption to existing infrastructure.

The mix of housing proposed including bungalows and smaller dwellings will bring housing into the reach of local people in a village where most of the recent development has been larger more expensive dwellings, local residents will be given the opportunity to "down size" without moving out of the village, all of which maintains social cohesion in a close knit community.

The site is close to not only the A146 but also bus and cycle routes.

Although the site will claim agricultural land the land in question is not prime, it comprises light soil which requires irrigation in dry weather, in a part of the country which has water supply problems.

In conclusion it is my view that if one of the proposed sites must be developed WLP7.2 would be the most suitable site.
Attached documents
Jayne Evans

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 107

Comment WLP7.2 Barnby and North Cove

My preferred site for the new development would be Site 132 New Road. My reason for choosing this site are as follows:

I believe it will connect the properties existing to Barnby and I think could ease the traffic situation on the A146 by allowing perhaps traffic lights or similar to be installed. Your reasons for refusing this site previously was it would be disconnected but I believe 45 properties would fit nicely on the site & ease congestion by the school.

New Road could only benefit as well as Barnby & could be well serviced by Public Transport.

Attached documents
Julie Reid

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 1039

Comment In principle I support the provision of a small scale housing development of the land between The Street and A146 Barnby. This is the most appropriate area in the village for a housing development, as it has existing infrastructure, and obvious access from the A146. It would fit in with recent newer style housing which has been built nearby in recent years. It is important however to maintain the rural outlook of our village. Therefore I would urge that sympathetic planting of trees and shrubs be included within and around the development, in order that the effect of a 'housing estate' is avoided. A mix of houses styles is important for similar reasons.

The Street is busy with cars during the periods at the start and end of the school day. The school is in close proximity to this land, on the opposite side of the road. The Street also forms part of National Cycle Route 30. From daily observations as a resident, both as a cyclist and car driver, I consider the safest option for an entrance and exit to such a housing development on this land to be on the access road to the A146, and NOT on The Street. A filter lane into the development could be considered.

Attached documents
K Mayall

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 570

Comment We live directly opposite the farming land on The Street in Barnby and strongly object to the proposal of houses being built on this land. Our main reason for buying this property was because of the beautiful views of the fields and we would be extremely upset if this was lost due to new houses being built. This new development would affect the value to our property and attractiveness to sell if we wish to do so in the future. We are also concerned about the increase in traffic and noise during the construction period, which would cause a huge disruption to our daily lives and to many of our neighbours in our beautiful peaceful village location. The traffic and noise levels would also rise with the extra number of people living in the village and we would be deeply upset if our serene and tranquil village was ruined because of this. We currently feel safe to allow our two children to play in the neighbourhood and cycle on the street outside our house. We feel that the increase in traffic, during and after the construction, would be a greater danger to them to carry out the outdoor activities that they enjoy and we would not want them to lose their freedom.

Attached documents
Mike Lincoln

Section  WLP7.2 - Land between The Street and A146, Barnby

Comment ID  1214

Comment  
I note the land between The Street and A.146, Barnby (WLP7.2) has been proposed for the local plan in preference to all the other sites put forward.

Having grown up and lived in North Cove and Barnby for over 52 years, I am very familiar with the area and can even remember when the main Lowestoft-Beccles road ran through both villages! Now The Street and The Hill. The farmland is of poor quality, ask any of the people who actually farm it.

The proposed site is large enough to provide a full and complete cross section of housing requirements for the area. A mixture of homes, 1 - 5 bed houses, bungalows and landscaped areas all in line with WDC requirements. Proposed 45 new homes over 20 years of the local plan to 2036 equates to just 2+ homes per year over the life of the plan.

It is adjacent to the current physical limits of the village, within the natural boundary caused by the A.146, which enables close and easy access to the main road resulting in minimal disruption to the village road system. Being on top of The Hill the site does not flood.

The local school is nearby across the road from the site.

Bus routes which provide excellently public transport links (almost every 30 minutes), run along both the north and south sides of the site.

All mains services are either running over the site, gas and electric, or in the adjacent verge/road, water, sewage and phones (fibre broadband is nearby) also I believe permission has been granted for a mobile phone mast to be in the village.

Barnby Parish Council’s response to Waveney District Council’s Local Plan in summary of responses to sites - August 2016 was positive "proposed site is the best of the sites put forward". I also believe recent consultations are positive.
Attached documents
North Cove Parish Council Jayne Evans

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 1270

Comment Earlier Local Plans state "This part of Barnby (site WLP7-2) is very open and there are clear views into and out of the village IT IS THEREFORE VERY IMPORTANT TO THE SETTING OF BARNBY TO LEAVE THIS SITE UNDEVELOPED". This is contradicted by the draft plan statement that "THE PARISHES WHEN VIEWED FROM THE STREET APPEAR AS ONE BUILT UP AREA". It does not; there are open views to the south and north in several places. The development will have a significant impact on the wider landscape. It is outside the village envelope.

Noise from the A146 will be a significant problem.

It is extremely difficult to turn out onto the A146 because of increasing traffic density. This results in some very dangerous manoeuvres. The bus service through the village has been reduced because of increased waiting time to turn out. If a roundabout is proposed as part of 'a deal' it will funnel North Cove traffic past the school. There are numerous accidents at the entrances to the villages.

Site WLP7-2 although flat in the north east corner, drops quite steeply towards the south west in the direction of The Hundred Drain, an area prone to frequent overflow and surface water flooding. Permission given by WDC on land off The Hill has been put on hold by the Environment Agency because of flood risk. To quote them "When determining a planning application, local planning authorities should ensure flood risk is not increased elsewhere". As Suffolk Floods and Water department states "Whilst we can express our view on a proposed development, it is the planning authority that makes the final decision" This could make them responsible should insurers look into causes of flooding claims. Surface water flooding is increasing in the area of the Hundred Drain; at times this "tributary river" (as described by the Environment Agency) is full to the point of overflow especially when there is a tidal surge increasing the height of the Waveney River into which it drains. Additional water from inappropriate development will cause flooding to properties in North Cove.
One only has to look at the massive amount of work currently being carried out along Tom Crisp Way by The Environment Agency to try and alleviate flooding in Aldwych Way Lowestoft, to see an example of inappropriate housing development.

Sewerage overflow: The sewers cannot cope there is frequent sewerage overflow into the garden of a property by The Drain.

Parking is already a problem at the school and this will be exacerbated by a potential 100 more cars in the locality and extra drives exiting onto The Street.

To be sustainable housing should be close to employment which should come first. There is a need for quality employment in the area.

Essential Infrastructure: It is pointless increasing the size of doctor’s surgeries, schools and hospitals if it is impossible to attract doctors, nurses, teachers to the area to fill vacancies. Extra housing will just increase the pressure on already overstretched and exhausted staff.

Attached documents
Paul Lawrence

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 106

Comment Regarding WLP7.2 (Barnby/North Cove)

Our preferred site would be No. 46, as this would avoid increased traffic through the village, and avoid congested parking issues at the local primary school.

These are serious concerns regarding the impact on A146 of increased traffic, and, in particular, access on the A146 from the village.

Attached documents
Paulette Pitcock

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 131

Comment
The formula proposed for 16 houses per hectare arriving at a figure of 45 houses on this 2.80 hectare site does not take into account the intention of allocating 0.28 hectares to an open space. Thus the revised number of houses should be reduced to 40.

New houses should be developed in a sympathetic manner and any planning approval subject to appropriate designs which will compliment the existing character of the village. The Northern edge of the development should be set well back from the site boundary and maintain the existing street building line thus maintaining a good separation from the existing properties opposite. Entry to the proposed site should be from the existing farmers entrance with obvious improvements thus mitigating all potential hazards. Proposals to place the entrance opposite existing housing on The Street (which is narrow and a bus route) would cause major problems for existing home owners when exiting their properties and for parents dropping their children off at the local school who already cause obstructions twice daily to the local properties.

All trees should be left on the Northern boundary of the site forming screening and maintaining the privacy of existing properties.

The electricity supply to Barnby is woefully inadequate with numerous power cuts in the course of a year and it has been mooted by the power supplier that all overhead power lines should be buried thus updating the existing arrangement.

The village of Barnby has a virtually non existent mobile phone signal with all providers and broadband speeds are poor.

Access to the A146 when exiting the village of Barnby or North Cove is particularly difficult and dangerous which increased housing on this particular site will exacerbate. A full investigation by the Highways Authority should be conducted to determine whether a new round about
should be installed at the junction of the proposed site as this could potentially become a new accident black spot.

In general I believe all these little piece meal developments along major routes reduce the attractiveness of our region with regards to Tourism. The appeal of Suffolk and Norfolk are the open aspects of fields they offer to visitors driving into the area. Visitors come from congested towns further afield and by developing new build sites along well used roads and not considering the impact from a visitors point of view is to the detriment of the industry our region is reliant on, Tourism. I believe use of brown field sites should be paramount and 'hidden' sites before any encroachment onto open farmland framing the entry to our beautiful coastlines.

Attached documents
Peter Simmons

Section  
WLP7.2 - Land between The Street and A146, Barnby

Comment ID  
242

Comment  
Where would the access road for new estate be?

Would there be provision for mini roundabouts at the Barnby and North Cove turnings?

How would you tackle education for the under elevens.

There are no shops in village. How would you provide for the people of the village.

How many of the proposed houses would be social or affordable housing.

I bet you don’t answer!

Attached documents
<table>
<thead>
<tr>
<th>Rachel Knight</th>
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<tr>
<td><strong>Section</strong></td>
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<td><strong>Comment</strong></td>
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<td><strong>Attached documents</strong></td>
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</tbody>
</table>
Robert Gill

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 66

Comment The proposed development in Barnby, WLP7.2, will abut the A146, with consequent severe impacts on noise and air pollution for the properties closest to the road. This will make them unattractive to potential occupants, running the risk of greenfield country side being built over, yet not fully utilised.

Attached documents
Robert Gill

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 67

Comment The proposed large development of 45 houses, ref Policy WLP7.2, is unacceptable on many levels:

The proposed development will have a detrimental effect on the amenity of nearby properties, both those opposite, and those on the same side of The Street. It will also have an adverse impact on a pleasant, tree-lined streetscape, with an open farmland aspect beyond, to the overall detriment of the whole village. It will generate difficulties with access onto and from the A146 and also increase pressure on on-street parking along this section of The Street, which in turn will cause road safety issues, especially for pedestrians, including children, and cyclists. There is no requirement for this development, given that a large area of land, close by in Ellough/Worlingham, has been designated as housing development. The high grade agricultural land should be retained, to protect the rural countryside character and enjoyment of the residents of the two villages. As outlined below, there are many issues relating also to infrastructure, preserving the streetscape and drainage, with few solutions proposed in the Local Plan.

Issues with site selection

We have studied the comments made in response to the call for sites with interest. North Cove Parish Council opposed the development, saying that the site provides visual amenity and development would dominate the landscape. Barnby Parish Council said that the site is too large and only part of the site should be developed and it should not be accessed through the village. The full development of this site therefore disregards the comments of both parish councils. Also, the recent proposed development along Swan Lane generated a large number of objections from local residents, and it is likely there would be the same strength of feeling with regards building on site WLP7.2.

The Settlement Fringe Study suggests that the site is 'in an area of
moderate landscape sensitivity'. WDC appears to have disregarded the findings of this study and it seems that the site is the 'least worst option' for the villages - not that it is in fact suitable. As we will set out below, there are significant constraints, and we feel that the site should be withdrawn from the Plan, especially with regards traffic safety and parking pressures.

There are limited facilities available in the two villages. There is no shop and an old and small village hall, with no dedicated car parking. Increasing the population will place further pressure on the village hall and also on the school.

Road noise, increased traffic, pollution

The site will be adjacent to the busy A146. In the Settlement Fringe Study, the consultant said that the limited tranquillity of the site along Swan Lane, with it abutting the A146, was a reason not to develop the site. The same rationale applies to site ref Policy WLP7.2. Occupants of the new houses will experience a high level of noise and pollution, especially as the prevailing wind comes from the direction of the A146. This will be even worse during winter months when there are no leaves on the trees. With recent research on the adverse effects of living immediately adjacent to busy roads, developing adjacent to the road will be a retrograde step. There is a strong possibility that traffic volumes on the A146 may increase with the completion of the Beccles Southern Relief Road, and also with the proposed large developments to the south of Lowestoft/Carlton Colville.

There is currently a trend to alleviate pollution and the effect that it is on school children in close proximity with schools. It needs to be recognised that despite alternative parking provision near schools, parents tend to drop their children as close as possible, often with little regard to the amenity of residents or road/pedestrian safety. Despite living in the villages, some parents still drive their children to school, so it should not be concluded that local residents do not increase the parking issues. This is the case for Barnby and North Cove School, as despite parking being available at the Garden Centre a short walk away, parents still park anywhere they can near the school, including on grass verges, double yellow lines, across lines protecting splays, and in nearby residential streets.

The junction of the Street with the A146, onto a straight 50 mile section of the road, needs urgent attention if an increased number of accidents are to be avoided. A roundabout is urgently needed. Exit and entry is already difficult at times, and turning right into Barnby at this junction, is dangerous with fast moving traffic, especially when approaching from the Lowestoft
direction, as is turning right out of the junction, towards Beccles. When we attended the public exhibition on 8 August, the Planning Officer was unable to give any reassurances that this traffic issue was being investigated or addressed. He said that the Highways Authority will need to ensure reasonable flow along the A146 is preserved. However, the strong possibility of a fatal accident at this junction, needs to be carefully borne in mind and indeed, there have already been fatalities on the exits from the village. Also, there will be queues building up from the village to get onto the A146, especially during busy periods. Some older drivers find it difficult judging gaps in traffic and this leads to further delays and risk of accidents.

We estimate that 45 houses will generate in the region of 70 plus cars. This will exacerbate the present exit and access problems to the A146, and as stated above, there is a possibility that traffic volumes on the A146 will increase in the future.

Before this site is considered further, a traffic management survey should be undertaken, to assess the issues with the A146 stated above and recommendations made, for example a reduction in the speed limit along this section of the A146 and the construction of a roundabout.

The Parish Council are still saying that access to the site ‘will not be through the village.’ It is difficult to see how this can be avoided, unless the entrance to the site is constructed directly off the new roundabout at the junction with the A146. There are also concerns in the village about how construction vehicles will access the site and the consequent disruption, parking of site related vehicles and mud.

Pressure on on-street parking

The Plan sets out that the footpath along the south side of The Street should be extended along the whole frontage of the development. At present, due to the pressure on parking related to the School, traffic parks a considerable distance along The Street, including in the entrances to side turnings such as Wiggs Acre. Cars also park on the grass verge on the southern side of The Street, despite signs outside the School asking people not to do this. This unauthorised parking causes a hazard to children and their parents, and also reduces sight lines for traffic coming along The Street, and for residents turning in and out of their drives and side streets. This is not an issue just at the start and end of the school day, but persists during the day and often in the evenings as well, including issues during fêtes and special events and coach trips. Please see attached photographic evidence ref DSCF 4672,4675,and 4784.
The development will pose a risk that cars will start to park on the grass verge on the northern side of The Street. This verge is much narrower and therefore the available width of the carriageway will be further reduced, and damage caused to the verge, thus further reducing amenity for residents and increasing road and pedestrian safety issues.

Poor supporting infrastructure

The Plan states that Barnby and North Cove Primary School is to expand by at least 15 places and to be extended to accommodate this. The estimated cost of this in the supporting Infrastructure Plan is £182,715. This figure appears conservative and a developer being asked to meet the cost may make the costs of the development unviable. We understand that an extension has recently been built on the school to accommodate current volumes and there is some doubt in the village as to whether further extensions are viable.

Additionally, if a new school is built on the garden village at Worlingham, this will increase traffic needing to use the junction with the A146, thus adding to traffic volumes.

There is no GP surgery in the villages, with residents normally registered at either the Beccles Medical Centre or GP practices in Carlton Colville or South Lowestoft. All the developments proposed in the Plan will necessitate the provision of increased GP cover. There is frequent media comment about the difficulty in finding new GPs and other staff. New/extended GP buildings will not in themselves ensure services if insufficient GPs or staff can be found.

The electricity supply to the village is suspect with frequent power cuts. It will be necessary for further demands on electricity supply to be addressed by upgrading, and also the power lines running across the site will need to be buried, increasing development costs. With the increasing trend for electric cars, the new development will need to accommodate charging points which, in turn, will place greater load on an already fragile electricity supply.

WDC’s Policy on Sustainability refers to increased opportunities for working from home. The broadband speeds in Barnby are still poor - even using BT Infinity - buffering still occurs with any size of download.

The mobile signal, with all providers, is poor to non existent. A new mast is unacceptable to the village, and applications to erect one have been
refused in the past.

Surface drainage

As stated in the Plan, the Worlingham Water Recycling Centre is already over capacity and there will be considerable disruption and cost in diverting new sewage flows to Beccles and improving the local foul sewerage network.

The Street floods on a regular basis, following relatively short periods of heavy rainfall. Further run off from hard surfaces within the new development will add to this problem. Because the surface water from the road drains away very slowly, we believe that this surface water drains into the field. This needs to be addressed if a development is to be built on waterlogged ground. After recent heavy rain, fields in the immediate area have lying water, indicating that the water table in this area may be relatively high. Has this been checked? Photographs demonstrating the problems are attached - ref DSCF 4817, 4809, 4788 and 4775.

Planning and design

If the decision is taken that the development is to proceed, we hope that WDC will play close regard to its various policies concerning planning design and parking allocations and impose suitable planning consent conditions.

Access and road safety:

The Plan comments that the site can be accessed from The Street. The present access is on a blind bend and close to the junction with the A146. Improvements to the sight lines from this access need to be considered. If this is not considered suitable by the Highways Authority, then the access will need to be from The Street, probably between the existing trees on the northern boundary opposite Clearview. But this, in turn, will create road safety issues, especially in view of the Clearview entrance directly opposite, limited sight lines, (especially with on street parking throughout the day, increased during the drop off and pick up times from the school) and thus proximity to young children and their parents. It is therefore doubtful whether a safe and suitable access/exit for the site can be identified. The best option is to have an access directly onto a roundabout at the junction with the A146. Photograph attached, ref DSCF4757 demonstrates this problem.

Irrespective of where the access is, there will need to be stringent measures put in place to ensure the safety of pedestrians, cyclists and traffic, in view
of the severe parking problems which already exist and which will worsen if the development goes ahead. These measures should include:

* a consideration of a dedicated car park for the school, funded by a section 106 agreement. There is a large playing field to the rear of the school which could be used for this.

* Double yellow lines on both sides of the road

* Timber posts set into the remaining grass verge opposite the development on the north side of The Street (using the example of timber posts recently installed on a grass verge in Mill Lane)

* Attention to traffic sight lines, which should not be able to be compromised by illegal car parking

* Attention to how the existing cycle route can be improved safely

If the roundabout is not provided, and access to the development is elsewhere, such as the current access into the field, consideration could be given to including a ‘service road’ to the houses fronting The Street, running parallel with the front boundary. This would have the benefit of setting those houses further back and giving parents somewhere else to park whilst dropping off and collecting their children from the school. This will also enable the existing trees along the northern boundary to be retained. If each of the houses fronting The Street is to have individual driveways, this will involve removing the trees, to the denigration of the streetscape, and will further increase access difficulties and road safety issues.

Maintenance of streetscape:

The Plan states that the ambition is to have smaller houses, as compared to those recently granted planning permission in the village. However, the design needs to be of a type that is complementary to the existing housing stock in the village, and sympathetic to the rural Broads setting, and certainly of a much higher standard than some recent new developments in the Great Yarmouth and Waveney area (such as the ongoing Beacon Park development between the A143 and A12, where housing is bland and appears as row upon row of identical properties).

Several of the existing houses have rear gardens that back onto The Street. The positioning of a play space together with ancilliary open space, with a corner location facing onto The Street, will result in undue noise from children and will be detrimental to the amenity of those existing residents who enjoy the peace and quiet of their gardens and the overall peaceful
nature of the village. It also runs the risk of children running out into the
traffic. Any such play space should be located away from The Street,
towards the centre of the development, so as to not cause loss of amenity
to existing residents.

Houses facing The Street, on the northern edge of the development, should
be set well back from the site boundary, maintaining the existing street
building line and maintaining good separation from the properties opposite.
They should be located in line with the other housing along the south side
of The Street, to maintain continuity of the streetscape. The existing
attractive trees, to the northern edge of the boundary of the site, should be
retained, and perhaps added to, with the foundations of the new houses far
enough away to avoid damage by their roots. These trees, together with
the grass verges, should also be protected from contractor damage during
the construction process. This should be a condition of any planning
permission granted and is in line with the guidance within the WDC
Planning Design Guidance.

The new houses should be developed in a sympathetic way and not to the
detriment of the village of Barnby, including the affordable housing. They
should reflect the existing character of the village. The comments about
recent development of large houses are noted, but it must be recognised
that they are of individual and attractive design and thus enhance the
streetscape. The new development must do the same. The design should be
restricted to an open layout, and certainly not exceed the proposed density
of 16 houses per hectare. It is important to design the development in a
way to prevent anti-social behaviour and so that all residents, whether or
not they live in the affordable housing, feel proud of their environment
and preserve a pleasant atmosphere and place to live. The village at present, is
a quiet and safe place, and must be preserved as such.

The total area is 2.80 hectares, of which 0.28 hectares is to be allocated as
open space. Using a density of 16 houses per hectare, to reflect the original
intention in the plan and respect current housing densities in the village,
this equates to 40 dwellings, not 45. The planned number should therefore
be reduced accordingly.

Parking allocations for houses:

The Suffolk Parking Guidance contains useful stipulations about how and
where parking should be allocated to new houses. In particular, we support
the idea that cart lodges should be built, instead of garages, as garages tend
to be used for storage of household and garden items, and therefore a
parking space for a car is wasted. It needs to be recognised that, in this rural location, with only a limited bus service, most households will have two cars. Therefore, sufficient parking to accommodate all the residents' cars, on the basis of two cars per house, plus their visitors, must be provided within the curtilage of the site. This will help to prevent worsening car parking problems along The Street, as referred to above.

However, having suggested ways in which the detrimental impact of this development could be mitigated, it remains our contention that this site is unsuitable, and should be removed from the Plan. The infrastructure costs of developing the site, combined with the low density housing, may make it unattractive to developers. There are few services in the village, and it is doubtful that a development of this size will produce sufficient additional volume to encourage more services, such as a shop, into the village. Nearby sites should be developed first, which will also give more opportunity to provide sufficient affordable housing. The main areas of employment are either in Lowestoft or in Norwich, and therefore more consideration should be given to developing houses in those areas to alleviate long car journeys. Lowestoft is the closest large town, and priority should be given to developing brown field sites first in that area, to avoid too much development of greenfield sites and keep people close to the main sources of employment, particularly with the emerging offshore wind industry.

Attached documents

- DSCF4672.JPG (3.0 MB)
- DSCF4675.JPG (3.2 MB)
- DSCF4684.JPG (3.0 MB)
- DSCF4817.JPG (3.1 MB)
- DSCF4809.JPG (3.0 MB)
- DSCF4788.JPG (2.9 MB)
- DSCF4775.JPG (2.8 MB)
- DSCF4757.JPG (3.1 MB)
- BarnbyFlooding (3).jpg (193 KB)
- BarnbyFlooding (4).jpg (258 KB)
- BarnbyFlooding (1).jpg (204 KB)
- BarnbyFlooding (2).jpg (232 KB)
Robert Gill

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 55

Comment

We welcome the draft Local Plan in principle, as it sets out options for how housing growth will be accommodated in future years. We do though, believe that the proposed distribution of housing between Beccles/Worlingham/ Ellough, as compared to the Lowestoft area, is incorrect. More housing should be concentrated in the Lowestoft area and less in the Beccles area, including the village of Barnby. We have serious concerns that increased traffic/parking requirements in the town centre of Beccles will spoil what is currently a self sufficient and thriving market town. However, Lowestoft, although having great potential, desperately needs more people using the retail, entertainment and leisure offerings, and for these to be improved. A greater concentration of housing in this area will help to promote this. The current proposals run a serious risk of disadvantaging Beccles and not improving Lowestoft to its full potential.

We believe that the proposals in policy WLP7.2 (Between the A146 and The Street, Barnby) have a number of serious deficiencies, and in some cases, are in direct contravention with the supporting documentation provided with the plan. We also believe that the reasoning in the Options Appraisal in respect of sites within Barnby and North Cove is flawed, both in terms in contravention of supporting documentation, and also the failure to recognise infrastructure needs around access/exit onto the busy A146 and increased pressure on parking opposite the school. We also believe the proposed development will be detrimental to the amenity of neighbouring properties and detrimental to a pleasant, tree lined streetscape. The proposed development also is contrary to the views expressed by North Cove Parish Council and the Broads Authority and does not pay full regard to the views expressed by Barnby Parish Council, which said only part of the site should be developed and not accessed through the village.

Having attended two village meetings to discuss the plans, it is clear that the majority of people do not recognise a need for more housing in the village pfBarnby.
It is interesting to note the recent decision by South Norfolk County Council where plans for development in the village of Bracon Ash were rejected by councillors, despite officer support of the plans, because of concerns about the impact on the village, and the negative impact on road safety, drainage, wildlife and much more besides. This is parallel in the situation in Barnby, where a pleasant village could be spoiled due to the national imperative to build more houses, when there are more suitable brownfield sites available not too far away.

We address these concerns, and others, in more detail in the appropriate sections of the consultation document.
Sally Norfolk

Section WLP7.2 - Land between The Street and A146, Barnby

Comment ID 322

Comment I object to the site of the proposed new homes in WLP7.2 Barnby and North Cove.

This is TWO villages, not one. It has two parish councils, two churches, two pubs and is not considered by residents as one entity. Classify therefore as two smaller villages.

The area in BARNBY proposed for 45 new homes, is the open space as one enters the village. It is an important space, and without a village green, is essential to maintain a wide open feel to the village.

If BARNBY needs more housing, then a few could go on proposed '46', subject to access but not a development of 45. This is a small village and would lose its identity and rural location feel if it had a large development.

School, access onto A146, wildlife corridors would all be adversely affected if this large block of new homes were to happen. Infill, and small developments of up to 10 new homes shared between the TWO villages would be more acceptable.

Attached documents
Suffolk County Council Robert Feakes

Section                      WLP7.2 - Land between The Street and A146, Barnby

Comment ID                  1744

Comment                      Access from The Street New footway along frontage

Attached documents
Suffolk County Council Robert Feakes

Section  WLP7.2 - Land between The Street and A146, Barnby

Comment ID  1685

Comment  No evident discharge strategy. If ordinary watercourses are available, there is significant flood risk from the Hundred Drain downstream would require betterment on greenfield rates.

Attached documents
Blundeston Strategy and Site Allocations

Alison Begley

Section Blundeston Strategy and Site Allocations

Comment ID 364

Comment With regards to the draft plan and how it relates to Blundeston, I have the same concerns which I raised when the proposals were first published. These are that we are already having a huge development built on the former prison site which should be the only site included within the plan.

The village is already approaching the size of a town, and we already experience problems with the sewerage and drainage system which we have been told is not adequate for the increased numbers of properties being built and lived in.

It is imperative that rural areas retain the green spaces which are vital to our dwindling wildlife and provide a background to support the emotional welfare of people living and working in an increasingly stressful world.

The streets are not able to cope with additional traffic, and each new house is likely to have a minimum of 1-2 cars so that residents can travel to employment elsewhere as there is little opportunity to work in Blundeston itself now that the previous main employer, Blundeston Prison, has been demolished.

The school is already oversubscribed and we do not have a GP surgery in the village. The surgery most people from Blundeston access has already been required to take on additional patients when another surgery was closed down and it is difficult enough to get an appointment now; how are we supposed to cope if the number of suggested new building goes ahead with the resulting number of new residents? There is no point in assuming that the infrastructure will be put in place after a huge expansion to Blundeston as this would put yet more strain on the area, congest the area even more and take away any of the remaining character we have in the village.

I understand the need to provide more housing but reiterate that I believe
Blundeston is already contributing as much as it should in the redevelopment of the prison site.

Attached documents
Alison Dixon

Section Blundeston Strategy and Site Allocations

Comment ID 586

Comment Why build extra houses in Blundeston Village when there are plans to use the Blundeston Prison site?

Attached documents
Christine Tyacke

Section Blundeston Strategy and Site Allocations

Comment ID 696

Comment 7.19 "The prison site will develop a significant amount of new housing as well as pre-school" (already on that site) "retail and employment units. The strategy is to allocate a small amount of additional development once the prison development is complete in order to enable the community to accommodate this growth and reduce the potential impact on the character of the village."

Comments:

• This is a nonsense statement. You do not build lots of houses "to lessen or accommodate the impact." Large developments increase the impact. If you look on the photo map in the plan of the two sites you will note that the "smaller development" is in fact the larger development and has a greater impact. 45 houses is not a small development, which is usually defined as being about 5 houses.

Attached documents
Kevin Begley

Section Blundeston Strategy and Site Allocations

Comment ID 558

Comment With regards to the draft plan and how it relates to Blundeston, I have the same concerns which I raised when the proposals were first published. These are that we are already having a huge development built on the former prison site which should be the only site included within the plan.

The village is already approaching the size of a town, and we already experience problems with the sewerage and drainage system which we have been told is not adequate for the increased numbers of properties being built and lived in.

It is imperative that rural areas retain the green spaces which are vital to our dwindling wildlife and provide a background to support the emotional welfare of people living and working in an increasingly stressful world.

The streets are not able to cope with additional traffic, and each new house is likely to have a minimum of 1-2 cars so that residents can travel to employment elsewhere as there is little opportunity to work in Blundeston itself now that the previous main employer, Blundeston Prison, has been demolished.

The school is already oversubscribed and we do not have a GP surgery in the village. The surgery most people from Blundeston access has already been required to take on additional patients when another surgery was closed down and it is difficult enough to get an appointment now; how are we supposed to cope if the number of suggested new building goes ahead with the resulting number of new residents? There is no point in assuming that the infrastructure will be put in place after a huge expansion to Blundeston as this would put yet more strain on the area, congest the area even more and take away any of the remaining character we have in the village.

I understand the need to provide more housing but reiterate that I believe Blundeston is already contributing as much as it should in the
redevelopment of the prison site. Without doubt should all of the proposed sites in the Blundeston area be developed it would have a detrimental effect on the residents of an otherwise beautiful and peaceful village and will in time lose its identity and become a mere extension of the town of Lowestoft.

Attached documents
Louise Duffer

Section  Blundeston Strategy and Site Allocations

Comment ID  759

Comment  This site would increase the traffic in Market Lane which is a small rural road, many of the properties on Market Lane have driveways which are difficult to reverse / pull out of so making this road busier would impact this and cause accidents. The prison site is already increasing the number of houses in Blundeston. The drains for the properties around and on Market Lane are not great and this development would increase the pressure on those. Too many houses will take away the current rural feel of the village.

Attached documents
Melanie Wright

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**Comment**

Whilst Blundeston has been identified for further development, it has little to offer in the way of amenities and infrastructure. The planning document states that jobs are available in Yarmouth & Lowestoft, but in reality jobs are hard to come by especially given the current growth in housing in both towns. Whilst employment opportunities may be more plentiful in Norwich, this represents a lengthy commute along roads which really need to be upgraded if they are to cope with a significant increase in the volume of traffic.

There are limited amenities in the village - for example there are no medical facilities the nearest being Oulton Broad or Hopton. The existing school is already over subscribed and it is hard to see how the current school could be expanded to cope with increased demand. The village does, however, have a vibrant community feel with a number of local clubs and societies available to those who wish to partake in village life and it is hoped that this sense of community would not be lost by over development of the village.

**Attached documents**
NOV Hydra Rig Mick Straw

Section  Blundeston Strategy and Site Allocations

Comment ID  517

Comment  Looking at the local plan there appears to be some heavy development in and around the village of Blundeston, however the development of the old Prison Site doesn't appear to show on any of the local development plans.

Surely the introduction of circa 130 new houses in this part of the village is more than enough to subject the local infrastructure of transport, roads, schools doctors and dentists etc.

Do we actually need two more housing sites being developed?

Attached documents
WLP7.3 - Land south of Lound Road, Blundeston

Badger Building (E.Anglia)Ltd Edward Gilder

Section WLP7.3 - Land south of Lound Road, Blundeston

Comment ID 1456

Comment We support the allocation of site 49. We note the policy requirement that the site should not be developed before 2025 and we consider this to be both unreasonable and unnecessary.

We are of course aware of the permission granted at the prison and the need to assimilate that development in to the village. An additional 18 dwellings on top of those approved at the prison is not going to make any difference to the assimilation of development by the village. The sites are at opposite sides of the village. There will be no traffic conflict and no additional impact on the landscape. The plan notes that the site is fallow – leaving it unused for a further 8 years makes no sense when government is trying to increase the overall rate of house building. From a practical point of view running this site concurrently with the development of the prison would allow for better man power and logistical management.

Attached documents
Blundeston & Flixton Parish Council Sarah Wells

Section  WLP7.3 - Land south of Lound Road, Blundeston

Comment ID  502

Comment  We agree with your conclusions regarding this relatively small site of 0.88 hectares with a maximum number of 16 dwellings. Although it is on the western edge of the existing village envelope we feel that a sensitive, low density, development which would reflect the character of that area of Lound Road would be acceptable. We note that because of the large development at the former prison site, planning permission on this site would not be considered before 2025. However the Parish Council would be prepared to consider a proposal for earlier development of part of this site, the 'brownfield' area previously used for horticulture, if that was deemed necessary.
Environment Agency

Section  WLP7.3 - Land south of Lound Road, Blundeston

Comment ID  875

Comment  We support the landscaping part of the policy, in particular the use of hedgerows to provide connectivity through the site helping to enhance biodiversity. It could be that these hedgerows could be used to form the basis of a wider network of green corridors, providing the optimum gains for wildlife.

Attached documents
Helen Brown

Section
WLP7.3 - Land south of Lound Road, Blundeston

Comment ID
16

Comment
I have read the reason for development of the lound road site and feel that just because it is a smaller site and development it should not be underestimated what impact this would have on the village with most households having an average of 2 cars the access in and out of this site and exiting lound road onto Flixton road (blind corner) will only be an accident waiting to happen as I have witnessed many near misses and also head on crashes at this location.

Also the access from this development onto the south foot path I'm guessing would be made up with a tarmac path and totally taking away the natural footpath that exists at the moment and is in keeping with the rural setting and not some tarmac path found on new urban housing estates.

I strongly feel that with the Blundeston prison site development this is more than enough development for one village.

Attached documents
Isaac Francis

Section WLP7.3 - Land south of Lound Road, Blundeston

Comment ID 71

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
Melanie Wright

Section WLP7.3 - Land south of Lound Road, Blundeston

Comment ID 400

Comment Whilst the Lound road site may be suitable for development, this will need to be backed up by significant improvements to road access as it is located on one of the more minor roads in the village. There may also be opposition from those already living along Lound Road who will find their rural views being replaced by housing, which may result in a deterioration in the value of their properties.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.3 - Land south of Lound Road, Blundeston

Comment ID 1725

Comment Locate access away from bend to east. Very minor Road so should not exceed 16 dwellings

Attached documents
WLP7.4 - Land north of Pickwick Drive, Blundeston

Blundeston & Flixton Parish Council Sarah Wells

Section: WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID: 503

Comment: Whilst agreeing in principle that this fallow site, of 2.29 hectares, is suitable for future housing development we have some concerns regarding the proposed scale of development on this site. We totally agree with your excellent proposal that 0.2 hectares of the site should be set aside for open space with the provision of play equipment. However we strongly urge that the density of dwelling houses on the remaining 2.1 hectares of the site should not exceed 18 dwellings per hectare, not 22 per hectare, to remain in keeping with the housing density and character of the rest of the village. This would provide for a maximum of 38 dwellings on this site rather than the proposed 45. We note and fully agree with your comments regarding the need for landscaping, tree and hedge planting and protection orders on existing hedges and trees. This would help to retain the rural character of this site on the northern edge of the village envelope and protect and enhance the biodiversity of the area. In that context we note that the site has remained unused and relatively undisturbed for many years which will have enhanced and possibly changed the resident fauna and flora. This situation will definitely require the ecological assessment and resultant mitigation measures, which you propose, well in advance of any proposed development. We agree that, because of the relatively large scale of this proposed development, planning consent should not be considered before 2025 and not before the ecological assessment noted above has been carried out and the results evaluated.
Carl Alderton

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 700

Comment Policy WLP7.4 - Land North of Pickwick Drive, Blundeston

I agree with the location of this proposed site as it does keep the development contained within an area which already has significant development along its boundaries, making it a natural choice. I would question the proposal to include a play space, when there is already a large well equipped play area beside the village hall, bringing parents and children together at a larger play space would surely provide a better a basis for a more integrated village with a stronger identity. I general I agree with Policy WLP7.4 and support it, I am considering returning to Blundeston and this is exactly the type of development where I would like to find a new home.

Attached documents
Christine Tyacke

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 695

Comment

I am a Blundeston resident since 1973 and will be honest in the fact that there is an element of "NIMBYism" in my comments and objections to the development on site WLP 7.4. Having said that, my comments are valid in that they will also be of concern to other residents.

Comments:

In unstable political times both nationally and internationally it would be wise for a country to be more self sufficient in food production. This planned site is to be on prime agricultural land, which although left fallow in recent years so that planning for building would be more likely to be obtained, it would be wiser and more sustainable if this was returned to agricultural or horticultural use.

We should also be concerned about the land being turned over to more concrete, which will almost certainly be a permanent feature. Rarely is it returned to green field site. Also this site does not fit in with many of your own criteria, and there are many contradictory or illogical statements contained in it.

7.19 "The prison site will develop a significant amount of new housing as well as pre-school" (already on that site) "retail and employment units. The strategy is to allocate a small amount of additional development once the prison development is complete in order to enable the community to accommodate this growth and reduce the potential impact on the character of the e village."

Comments:

• This is a nonsense statement. You do not build lots of houses "to lessen or accommodate the impact." Large developments increase the impact. If you look on the photo map in the plan of the two sites you will note that the "smaller development" is in fact the larger development and has a greater impact. 45 houses is not a small development, which is usually defined as
being about 5 houses.

• The WLP4 site came up for planning some years ago and was disputed. The department of the environment became involved at a meeting at Rectory Road chambers. The dept of Env emphatically decided it was not an appropriate site for development. There is no reason why this would have changed.

There has already been significant development in Blundeston in recent years

• 6 houses at Hedgerows, Lound Road

• 13 houses at Wickfield Close (where the village garage used to be. We no longer have a garage)

• 22 houses on the Pickwick Drive/Micawber Mews development

• 5 houses on the sites of the demolished Methodist Chapel and demolished Red Lion pub.

• A residential house where the village shop and post office used to be. (No post office now)

• 3 houses in Market Lane, on the corner of Pickwick Drive where one house used to be.

Very few of these were affordable houses for first time buyers or the elderly.

• The development to the north of Pickwick Drive is contradictorily described as being "contained within the wider landscape" but also that it will create "a prominent settlement edge to the north and east, i.e. an extended boundary. It can't be both "within" and simultaneously at a newly created edge.

• With insidious developments like this the village will eventually become joined to Lound and not a separately contained village. This is already happening to the southern borders of the village.

There is also the factor of the sewerage pipe running across the site.

• The development at 22 dwellings per hectare is increasing the housing density of the village

• The roads to access the site are narrow both in Pickwick Drive and the Pippins, The one from Pickwick Drive onto Market Lane being on a
dangerous bend.

- With 45 new dwellings on the site there is the possibility of double that number of additional cars (plus the additional ones from the larger old prison site development) This will be dangerous on the narrow roads entering and through the village. The junction from Market Lane onto the A47 is already dangerous (a fatality there 2 weeks ago.) Residents have to have there own cars as public transport is negligible. There are no cycle paths in the village and roads aren’t wide enough to add them. This makes it difficult for children to cycle to the primary school and the nearest High School, so parents have to drive the children.

7.17 in the plan says that the development will "improve the attractiveness of the village as a place to live and support the community."

Comments:

A housing estate on the edge of a pretty village does not make it more attractive (who thought that one up!!?) Also it puts a heavier burden on the community and its infrastructure; it does not support it. How can it?!

7.20. The plan states that this will "support the existing settlement and services"

Comments:

No it won't. There are very few services existing (No P.O., no surgery, pharmacy, food shop, garage, child clinic, dentist, residential homes for elderly, etc. Public transport) a fact which is acknowledged immediately after the statement by saying these will have to be provided, although it doesn’t say where or by whom.

There is also little mention of environmental impact i.e. noise pollution, light pollution. Blundeston has so far resisted having significant street lighting so that it remains one of the few places where you can still see the stars. It still remains a low crime area in spite of this (maybe because of this?).

Attached documents
Colin Gooding

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 416

Comment I strongly object to the proposal to build 45 residences on the land north of Pickwick Drive. Blundeston is a small rural village with few amenities which is its attraction. Living in The Pippins my principle objection is the prospect of access to this site via The Pippins which is a pleasant cul de sac with no through traffic. Access to 45 new houses will create an intolerable increase in traffic flow.

The Street in Blundeston is already a narrow, congested and vastly overused road which will be expected to cope with even more traffic especially if The Pippins access option is adopted. I have no objection to pedestrian access but certainly not vehicular, which should be exclusively through Pickwick Drive being the first stage in this area of development.

There is a well established hedgerow which borders this proposed development area home to a vast array of birds and wildlife, it is essential that this hedgerow is left intact as a natural boundary.

I draw your attention to my previous concerns regarding development in and around Blundeston in the document attached below.

Colin Gooding

Attached documents http://consult.waveney.gov.uk/gf2.ti/af/799778/133513/DOCX/-/8656245%201%20Waveney%20District%20Councildocx.docx
Gary Shilling

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 10

Comment Too many dwellings for the road system or potential available, entrance via the Pipens is equally not via as an extra 80/100 cars travelling up the street (which is poorly provided for with regards to on and off street parking) would further increase the potential for accidents. The lack of footpaths and safe cycle paths. This would be a potential road traffic increase of 90-100 cars. This is a considerable amount considering the lack of continuous footpaths form the pond end of Barkis meadow down to the village hall. The local pond also cannot cope with the potential surface water as it has never recovered from the original extra dwellings (not enough consideration was given to the detrimental effect this has already had on the pond, and never been rectified.)

Attached documents
Ian Burwood

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 949

Comment To whom it may concern:

As always with any potential development within the surrounding area of Market Lane, the surface water and sewage pipework is not currently of a sufficient nature.

Adding to the current surface and sewage levels will no doubt cause further problems to a situation that is no way adequate as we stand now, let alone any further development in the area which will make the situation more serious.

I have been involved with you concerning the modifications to the surface water drains and pipework which has assisted our situation, but we still encounter surface water and sewage issues in various forms dependent on the level of rainfall.

Also the amount of surface water which enters the village pond from the last housing development is excessive, so adding more into what i assume will be the same pipework / routing will have a knock on affect with regards to the system running down Market Lane.

Please can this therefore be taken into serious consideration when reviewing this potential new site.

Kind Regards...Ian Burwood

Attached documents
Isaac Francis

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 68

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
Matt Howchin

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 1063

Comment I write regarding the proposed development of land as detailed in the Waveney Local Plan WLP7.4.

Whilst having no objection, in principal, to the proposal outlined I would request that careful consideration be given to the vehicular access to this area.

Currently access to Pickwick Drive from Market Lane when approaching from the A47 is by a right hand turn which leaves you blind to oncoming traffic until you have committed to the manoeuvre; this junction is already one that poses a high risk of an accident.

The provision of a further 45 homes on the proposed development and the estimated additional 90 vehicles that would bring would significantly further impact this junction. I would ask therefore that careful consideration be given to the vehicular access to the proposed development. It would seem preferable that access via The Pippins and or The Loke and not via Pickwick Drive be considered a site specific criteria for development.

Attached documents
Melanie Wright

Section  WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID  401

Comment  I have concerns about access roads to this proposed new development. Market Lane is the main road leading to Pickwick Drive and is already a very busy country lane, which would need some improvements being made in terms of its width and surfacing should this development go ahead. The other suggested access point of the Pippins is accessed via the Street which already has significant problems with vehicles parking on the road thereby making access difficult. The proposed number of houses seems high and would significantly increase the population of the village. Consideration would need to be given to infrastructure, services and amenities should such a development go ahead.

Attached documents
Mick and Lorraine Straw

Section WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID 1062

Comment We are writing to you primarily in relation to the proposed development of the land adjacent to Pickwick Drive mentioned in the Waveney Local Plan WLP7.4.

Recognising that there may well be a housing development need for additional properties in the Waveney area in principal we have no serious objections to the outlined proposal.

However we feel that we must make an observation regarding any planned vehicular ingress / egress from the site as proposed.

The access to Pickwick Drive along Market Lane when approaching from the North East from the A47 is via an acute right turn with a very limited opportunity to assess the presence of on coming traffic.

The junction, even with current traffic volumes, is already quite harrowing to use and the addition of maybe 45 houses (maybe an additional 90 or so vehicles) to this area would we feel exacerbate the dangerous nature of the junction.

With this is mind could we respectfully request that serious consideration be given when designing the access to and from this proposed site.

There are other routes which could be followed either via the Loke on Market Lane or even via a alternative approach from the Orchard Lane / Pippins side of the village although this would possibly have a serious volume impact for the junction on The Street.

Looking at the other development site identified (behind Lound Road) and taking into consideration that we are already seeing a vast development of the Prison Site to include up to a further 130 residences could we also request that serious consideration is given to the infrastructure in an around Blundeston both from a Public Transport point of view but also from a amenities, schools. doctors, dentists viewpoint as well.
Thanks in advance for you anticipated attention to the points outline above.

Attached documents
Sue Searby

Section  WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID  427

Comment  I think this area is perfect for development. The proposed area is in a larger village and next to new developments therefore further new builds would be in keeping with the area. Blundeston is a very popular village and it’s a place that I would be interested in moving to. The village school is wonderful however currently it has many out of catchment children so therefore would have spaces to accommodate more village children from a new development. The current area is full of brambles and old buildings (greenhouses?) so is not a pretty site, ideal for redevelopment. I hope the area gets planning approval and I can live there.

Attached documents
Suffolk County Council Robert Feakes

Section  
WLP7.4 - Land north of Pickwick Drive, Blundeston

Comment ID  
1726

Comment  
Northern end of Pickwick Drive not suitable for access to over 25 dwellings

Attached documents
Corton Strategy

M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section  Corton Strategy

Comment ID  932

Comment  Despite noting a good range of facilities and services, at paragraph 7.37, it is stated that:

'There is limited scope for new development within and around the village of Corton. The primary school is expected to be close to capacity over the next five years with limited scope to expand. Therefore any additional development will likely exceed the capacity of the school. In the longer term the village of Corton will benefit from the North Lowestoft Garden Village development allocated by Policy WLP2.12 (which falls within the Corton parish). This will provide new services and facilities and employment in close proximity to the village whilst retaining the character and identity of the existing settlement. Further development on the edge of Corton, could increase the risk of coalescence and undermine the separate identities of the existing village of Corton and the new development to the west.'

This is a less sustainable approach to meeting the community's needs by ensuring that children would have to travel by car to a school outside of the village, albeit technically within the Parish. It does not appear that the 'Draft Infrastructure Study July 2017: Identifying the infrastructure required to support growth planned in the First Draft Local Plan' has considered alternative options, including provision of a modest increase in school places at Corton Church of England School. There is also a confusing statement, given the Council's own CIL Regulation 123 List seeks to raise funds for the provision of pre-school places at this school. The capacity for the school to grow has not been adequately set out in the Plan and instead relies on the proposed primary school as part of the Lowestoft Garden Village, with a very unclear timetable for likely delivery.
Attached documents
Norman Castleton

Section  Corton Strategy

Comment ID  564

Comment  Corton Strategy: One of the reasons people visit or holiday in Corton is the proximity of the coast and the relatively undeveloped nature of the village and surrounding area. Any extensive development here or via the so called 'North Lowestoft Garden Village will kill the tourist trade and probably will ensure that those who like living in this environment will move. The village will become a ghost town ready to fall into the sea.

Attached documents
Kessingland Strategy

Badger Building (E.Anglia)Ltd Edward Gilder

Section  Kessingland Strategy

Comment ID  1457

Comment  We support the allocations made in the neighbourhood plan and are currently carrying out a technical investigation in to the site.

Attached documents
Kessingland Parish Council Donna Lee

Section Kessingland Strategy

Comment ID 663

Comment Kessingland Parish Council has formally reviewed the First Consultative Draft of the Waveney Local Plan, note that the elements within the Kessingland Neighbourhood Plan for 2016 - 2030 have been incorporated into the Local Plan and so given this, we have no further comments to make on the Draft Document.

Attached documents
Somerleyton Strategy and Site Allocations

Ashby, Herringfleet and Somerleyton Parish Council S H Read

Section Somerleyton Strategy and Site Allocations

Comment ID 530

Comment Overall, the proposal to add 55 dwellings on two sites to the village within the relatively short period of the remainder of the Draft Plan (18 years) is excessive. However, if the number is reduced as shown above and the indicated development dates shown in the First Draft Local Plan are adhered to with the Land North of The Street being developed before the Mill Farm Field then the village should be able to absorb the new dwellings.

Further to its email correspondence with Sam Hubbard on 22nd August the Parish Council remains concerned at the ability of the Primary School to cope with the additional children brought by these new housing developments. The School currently has 64 pupils despite a stated capacity of 56 but we note that the Education Authority is content that by the time the housing developments are complete it will be able to provide the necessary places. It will be necessary to maintain close contact with the Education Authority during the development of the two sites to ensure that this remains the case.

Given the character and quality of the village and that one site is within the Conservation Area and the other adjacent to it the Parish Council believes that WDC must demonstrate in action its commitment to outstanding design when considering applications for planning permission for both these sites.

Attached documents
David Cook

Section  Somerleyton Strategy and Site Allocations

Comment ID  1031

Comment  We would like to make WDC aware of our views regarding the Somerleyton Strategy and Site Allocations contained in the First Draft of the Waveney Local Plan:

* Somerleyton should not be classified as a Large Village. It currently only contains approximately 160 dwellings yet, due to it having certain amenities, it is classed as a 'larger village' and has accordingly been given a huge and disproportionate allocation for future housing.

* This classification should be reconsidered because its railway station is used, not only by people resident in Somerleyton, but people from other villages including Blundeston, it's Public House which, is now more of a restaurant than a local Public House, targets a large catchment area, it's Village Hall has recently been declined funding for desperately needed major improvements and the village has a very small School, which is full to capacity and has a high proportion of pupils from outside the village.

* Somerleyton is within a conservation area and contains many listed buildings and, based upon the Council's own policies it should therefore be protected. Large developments within the village will spoil it. We understand local authorities are under pressure from the Government to accelerate house building. We accept some change is inevitable but please restrict any building within the village to small-scale developments (2 to 4 houses only) to preserve its heritage and appearance. We must try and preserve at least a few of our traditional and quaint villages.

* The existing road system within the village will not cope with the increase in traffic, without major infrastructure investment, and parking requirements that will result from the building of 55 houses. It could lead to an additional 100 plus cars regularly using the roads within the village. In addition, there is no easy access to both of these sites.

* Plans are afoot to develop the Forge Garage site with a shop and food
preparation facility. We have already voiced our concerns that food preparation will be carried out so close to a fuel storage and distribution site. However, we feel that this development along with a housing development behind, sharing the same road access, will cause parking and major road safety concerns.

* We are somewhat surprised that a housing development has been proposed on the site of the current oil storage and distribution facility. It is widely known within the village, that major oil spillages have occurred on this site over the last few decades and may have severely contaminated the soil within this area.

* We assume that the Council will be fully aware of this, given the storage of fuel on the site will have been licenced, and would imagine that a fully intrusive environment survey (Phase 3) will have already been undertaken, or be commissioned by the landowner. We will be very interested in hearing the results and details of any remediation required before planning permission is considered.

* We are aware that three have been a number of recent developments in the village, which have not adhered to the proper planning process and retrospective approval was necessary.

* Can you please make sure that future planning applications and development are closely scrutinised and progress monitored to make sure this does not happen again? The Old Post Office (a listed building) is a good example and, after recent changes, it now bears no resemblance to its original appearance when operating as a Post Office, which we suspect, would have been a condition of a planning permission obtained prior to works commencing.

David Cook and Jenny Anderson
Ingrid North

Section Somerleyton Strategy and Site Allocations

Comment ID 544

Comment

I realise that the local councils have to have a development plan as specified by the Government but surely the major building works planned for Blundeston and the North Lowestoft Garden Village should fulfil the criteria.

This plan is a car park with houses, the majority of villagers have two cars and some have four. We should be getting cars off the roads rather than encouraging more, this plan will probably mean another 120 cars, we had a Village shop, now closed because people preferred making a 16 mile round trip to the supermarket. It would make more sense to base any building where there is easy access to shops and other facilities, with bus services.

The roads through this village are narrow and bends in the road obscure visibility at the various junctions onto it, further obscured by cars parking. Major road works would be needed to make the road safe. The density on both sites is far too high and the Mill Farm site is waterlogged at the road end which means only one third of the site would be viable as well as the fact there are possibly protected species in these ponds.

Attached documents
Julie Reynolds

Section Somerleyton Strategy and Site Allocations

Comment ID 48

Comment No objections to the proposal as long as we have more affordable family homes and single storey residences for the elderly. Most aspects of rural living appear to have been considered however, I have some concerns about the provision of primary education. The present school at Somerleyton is full and occupies a limited site. Community life is limited by small village hall, again on a very limited site. Both need improvements to support more people living in the village.

Attached documents
I have seen the plans for Somerleyton and feel that, given that development must take place, the sites are well chosen and the plans for protecting the character and quality of the village and environs are well-considered.

As a resident, I am concerned, however, that some aspects have not yet been fully taken into consideration.

The village school will need to be expanded, without damage to the appearance of the existing buildings or to the appearance of and facilities provided by The Green. How is this to be done? We value our local school. We do not want primary aged children to be bussed out of the village. I note that "new drop-off provision" has been mentioned, and this is very much the case as drop-off is already a problem. Somerleyton Estates have asked families not to park around The Green and this has lead to hazardous parking on the B road.

The village will need, more than ever, a convenience store and post office. The former village shop has been subjected to a change of use. I don’t see mention of a new shop anywhere in the plan.

The T junction of Station Road with the Street is hazardous for pedestrians. Anyone walking on the right ("facing the oncoming traffic") as they approach the T junction from Station Road, is completely invisible to a driver turning left from the street. There is no footway at this point and the safe pedestrian route bearing left to The Street from Station Road at its junction with Morton Peto Close is little used by pedestrians wishing to turn right, as it adds distance and time to the journey. I note that the plan mentions the provision of footways but I was unable to determine exactly what was intended.

MOST IMPORTANTLY Station Road is narrow, has a dangerous blind corner, and there is no pavement. Adequate provision for road traffic and
pedestrians will need to be made in order to provide safe, convenient passage. It will be difficult to do this in conjunction with preserving hedges and the character of the village. Some compromise will need to be made.

Attached documents
Robert Wild

Section: Somerleyton Strategy and Site Allocations

Comment ID: 26

Comment: The information in 7.41 is incorrect, there is not a good range of services. There is no bus service, no village shop, no post office and only an intermittent train service. The village school is full and local children cannot get a place meaning they have to travel to other schools.

7.42 This is rubbish. The green is not the heart of the village, it is situated at the edge of the village. The houses around the green are in a very poor condition and in need of maintenance and repair.

Attached documents
Simon Phillips

Section Somerleyton Strategy and Site Allocations

Comment ID 1053

Comment The number of addition dwellings proposed (55) is too great for the village to absorb in the relatively short Plan period (18 years) and should be reduced to circa 35.

All new dwellings should have regard to the design and characteristics of the existing buildings - smaller dwellings at fairly low density.

The village has little social housing and any development should add to this.

Attached documents
**Somerleyton Estate Lord Somerleyton**
Evolution Town Planning LLP (Steven Bainbridge)

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<tr>
<td>Comment</td>
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1.1 Waveney District Council is in the process of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the period up to 2036.

1.2 Evolution Town Planning have been instructed by the Somerleyton Estate to make representations to this public consultation. This report conveys the Estate's support for the Council's rural development strategy and the allocations of sites in Somerleyton. It also provides comments on the draft planning policies and the development options in Lound.

1.3 The District Council has previously invited land owners to submit details of sites for future housing development and has assessed those sites for their suitability and consulted the public on them.

1.4 As a result of these assessments and consultations the District Council is now inviting comments on its preferred development options for the District as a whole.

1.5 At the Call for Sites stage we provided background information on potential development sites in Somerleyton and Lound plus some early ideas on how the sites could be developed; whether solely for housing or as part of a more comprehensive approach to deliver community facilities. These proposals were reiterated at the Issues and Options stage.

1.6 The Somerleyton Estate remains committed to finding a way to reopen the village shop and post office which would further enhance the sustainability of the village in support of the allocations. As well as this it is noted from the draft policies and the draft local plan Appendix 1 that development in the village is expected to contribute towards a new community centre and a drop off point for the primary school.
1.7 These representations are a continuation of our earlier submissions and the Somerleyton Estate will continue to engage with the community of Somerleyton as the local plan and neighbourhood plan processes continue.

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Somerleyton Strategy and Site Allocations

Comment ID 1012

Comment

5.1 The Somerleyton Estate broadly support the draft local plan and in particular the proposed 'rural strategy' which has sought to address the acknowledged historic lack of development in rural areas such as Somerleyton and Lound.

5.5 The Somerleyton Estate have for years sought to encourage the recognition of the sustainability credentials of the village of Somerleyton and to expand the community whilst providing for improved services and facilities.

5.6 This echoes the ethos of the iconic Model Village designed by Sir Morton Peto, for which the village is well known.

5.7 The Somerleyton Estate support the quantum of development which the draft local plan proposes for Somerleyton and maintain that the draft site allocations remain available, achievable and deliverable.

5.8 It is no secret that the Somerleyton Estate have espoused a more comprehensive 'vision' for the future development of the village with a larger number of sites developed at lower densities both to match the existing pattern of development and because there is space and land available to do so. As such the Somerleyton Estate also support the provisions within the draft local plan for design briefs (adopted through neighbourhood plans or supplementary planning documents) to take the local plan proposals and embed them in the local context.

5.9 The Somerleyton Estate looks forward to working with relevant organisations including the District and Parish Council's on an award winning and sustainable future development for the village.
Attached documents
**Somerleyton Estate Lord Somerleyton**  
*Evolution Town Planning LLP (Steven Bainbridge)*

**Section**  
Somerleyton Strategy and Site Allocations

**Comment ID**  
995

**Comment**  
Somerleyton Strategy and Site Allocations 7.5 and 7.6

3.11 The draft consultation document sets out the local plan strategy for Somerleyton and details the two draft site allocations for the village.

3.12 The Somerleyton’ Estate supports both the strategy for the village and the quantum of development proposed.

3.13 The draft allocation sites WLP7.5 and WLP7.6 are owned by the Somerleyton Estate and remain available, achievable and deliverable.

3.14 As has been set out in previous submissions the Somerleyton Estate has for a long time now promoted the idea of new development which helps to provide local services and facilities as well as contributing to the history of the village with new iconic development.

3.15 The Somerleyton Estate also acknowledges the statements elsewhere in the draft local plan indicating that whilst the overall quantum of development and strategy for its distribution will be set by the local plan, the final detail and arrangement of site allocations and distribution within the villages could, where relevant, be dealt with by the neighbourhood plan.

**Attached documents**
WLP7.5 - Land North of The Street, Somerleyton

Anthony Cole

Section WLP7.5 - Land North of The Street, Somerleyton

Comment ID 797

Comment 15 house per Hectare is based on existing density which was used some 150 years ago and a trip round the green clearly shows this is not appropriate for today or the future. Priority must be given to off road parking / garaging. 2/3 bedroom houses will have at least 3 cars per dwelling. The area is congested and close to the junction street - Low/Nor road and will create a additional hazard to all. Only a much lower density is acceptable.

Attached documents
Ashby, Herringfleet and Somerleyton Parish Council S H Read

Section WLP7.5 - Land North of The Street, Somerleyton

Comment ID 528

Comment Policy WLP7.5 The Parish Council agrees, in principle, with all of the points in this Policy and it makes the following comments:

* The number of dwellings proposed for this site is probably too many because the First Draft Local Plan does not show the proposal to convert the old Forge Garage office at the front of the site into a shop. If the remainder of the site (to the North and West of the old Forge) is developed at the suggested 15 dwellings per hectare there will probably be fewer than 10 dwellings, which is acceptable.

* As the site is quite small and enclosed the maximum number of bedrooms per dwelling should be 3.

* Having regard to the quality of the surroundings of this site a design code/brief should be prepared for the site either as part of a Neighbourhood Plan or as a Supplementary Planning Document. No development should be permitted on the site until the design code/brief has been prepared.

Attached documents
Environment Agency

Section WLP7.5 - Land North of The Street, Somerleyton

Comment ID 876

Comment The policy identifies the former uses of the site that include a petrol station and chemical storage site. We support the statement that applications will need to demonstrate how contamination from this site will be remediated.

Attached documents
Gerda Gibbs

Section  WLP7.5 - Land North of The Street, Somerleyton

Comment ID  661

Comment  

* The number of dwellings proposed for this site is far too many because the First Draft Local Plan does not show the proposal to convert the old Forge Garage office at the front of the site into a shop. I suggest that the garage should remain and be developed to a local shop and only the north/west of the land should be developed at 15 dwellings per hectare.

* As the site is quite small and enclosed the maximum number of bedrooms per dwelling should be 3.

* Having regard to the quality of the surroundings of this site a design code/brief should be prepared for the site either as part of a Neighbourhood Plan or as a Supplementary Planning Document. No development should be permitted on the site until the design code/brief has been prepared.

As the village is quite small no parking facilities other than the narrow Street, the development of site Policy WLP7.5 must be completed before any work commences on site Policy WLP7.5

Given the character and quality of the village and that one site is within the Conservation Area and the other adjacent to it the proposed houses should have off road parking and must be of outstanding design.

Attached documents
Historic England

Section  
WLP7.5 - Land North of The Street, Somerleyton

Comment ID  
1387

Comment  
We are concerned about the impact of development as proposed in the both allocations in Somerleyton. Whilst there is potential for enhancement with the replacement of the former garage and workshop in WLP7.5, the impact that the allotment development would have on the conservation area and adjacent heritage assets, which are part of the estate village for Somerleyton House, does not appear to have been fully considered.

Whilst we note the 18 dwellings per hectare density for WLP7.6, consideration should be given to the current settlement pattern of the village as to a suitable distribution and quantum of housing for the site. The policy sets out a number of ideas which would be best expressed in an indicative masterplan, as used elsewhere in this document.

Attached documents
Jean Lindsay

Section WLP7.5 - Land North of The Street, Somerleyton

Comment ID 53

Comment This land has Japanese knotweed growing in various places on it. The land is not fallow, we are using this as a family garden, growing vegetables and have planted 200 trees in the last 6 months. We have taken on the former Post Office and have opened, a cycle hire and sales business. The land was also to be used also to help people who do not use cycles to gain confidence and practice before using cycles around the local area, visiting local venues and increasing the visitor numbers to the area. We felt this fits in with the Waveney Cycle Strategy. It is a peaceful area and wildlife can often be seen, fox, deer and many birds. At night there is a fantastic view of the stars, new housing will have street lighting. I am also concerned about the access to the land if a shop is put at the Old Forge as there will be a mix of people and vehicles in/out of the forecourt. I feel the number of houses suggested is too high. If this land is selected according to the outline on the map, it will not leave the property with any garden and I hope the estate will agree to allocate some of the land to a garden for Jernigan.

Attached documents
Michael and Carolyn Greer Walker

Section WLP7.5 - Land North of The Street, Somerleyton

Comment ID 511

Comment Many residents, ourselves included, would prefer no development. However if there has to be some, it should be in keeping with the village in style and size.

The proposed developments of 10 houses at the old garage site, and 45 houses on Mill Field and The Common, would considerably increase the size of the village, out of proportion. Somerleyton has 1, no room in the school, 2, no shop, 3, no bus service, 4, both Station Road and Slug's Lane are very narrow, without pavements, and unsuitable for potentially 100+ more cars on those roads.

Previous developments in the past 50 years, of Morton Peto Close, and Marsh Lane have not been of such density.

We would suggest that if planning is granted the number of houses be significantly reduced.

Attached documents
Simon Phillips

Section  WLP7.5 - Land North of The Street, Somerleyton

Comment ID  1054

Comment  I support WLP7.5, qualified as follows:

The maximum dwelling size should be 3 bedrooms

The Draft Local Plan does not show that the existing building at the front of the site (the old Forge Garage office) is planned to become a shop. This will reduce the area of this site available for housing development but it should retain the 15 dwellings per hectare density, probably resulting in fewer than 10 dwellings.

Given the character of the buildings surrounding this site a design code/brief should be prepared for the site either as part of a Neighbourhood Plan or as a Supplementary Planning Document. No development will be permitted on the site until the design code/brief has been prepared.

Attached documents
Somerleyton Estate  
Lord Somerleyton  
Evolution Town Planning LLP (Steven Bainbridge)

Section  WLP7.5 - Land North of The Street, Somerleyton

Comment ID  996

Comment  Draft Policy WLP7.5 Land North of The Street, Somerleyton

3.16 The draft local plan proposes to allocate the land north of The Street, locally referred to as ‘the garage site’ for 10 dwellings.

3.17 The garage site was submitted by The Somerleyton Estate at the call for sites stage and remains available, achievable and deliverable going forwards.

3.18 The Somerleyton Estate support the draft policy WLP7.5 in principle but also the proposed site specific criteria.

Attached documents
**Suffolk County Council Robert Feakes**

**Section**  
WLP7.5 - Land North of The Street, Somerleyton

**Comment ID**  
1727

**Comment**  
Direct access from The Street or improve Loke

**Attached documents**
**Suffolk Preservation Society Fiona Cairns**

<table>
<thead>
<tr>
<th>Section</th>
<th>WLP7.5 - Land North of The Street, Somerleyton</th>
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</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>714</td>
</tr>
<tr>
<td><strong>Comment</strong></td>
<td>This is a highly sensitive site with numerous heritage constraints and we question whether 10 houses can be accommodated without causing harm to the setting of designated and non-designated heritage assets. We recommend a lower number of dwellings solely on the brownfield part of the site and the retention of the green open space.</td>
</tr>
</tbody>
</table>

**Attached documents**
WLP7.6 - Mill Farm Field, Somerleyton

Anthony Cole

Section  WLP7.6 - Mill Farm Field, Somerleyton

Comment ID  897

Comment  7.52 This development would have a major (negative) impact on the village in many ways especially the the road traffic it will generate that must use the street. The Street is presently overloaded with traffic and parked vehicles and has blind dangerous bends to negotiate, the additional traffic will likely degrade and lead to the demise of the brick walls which are very much a part of the village character. Footpaths are narrow and pedestrians (children) will be in danger, walking to school will not be an option.

Somerleyton School already has a waiting list.

7.55 It is insulting to the village to suggest the Council houses along Station road should be reflected in any new development, they are out of character and an eyesore when built and continue to be so.

One can only assume that "local requirements" refer to housing needs outside the village as there are several empty house throughout the village, An external requirement will simply continue to overload the roads.

The two areas proposed and the total number of houses cannot be supported by existing infrastructure not only will the character of the village be radically changed dangerous hazards will be created and Somerleyton village will lost forever. Little has development has taken place in the village but even this and the change in lifestyle means the roads cannot cope. Cars have a major impact and are close to to destroying the image, no more can be accommodated with out total destruction.

I have seen firsthand what introducing a step change in traffic will do to environment, quality of life, character and well being of all when infrastructure is not in place, not planned and that cannot be done without totally changing the village.

The continued development around North Lowestoft (currently some 2000
houses) cannot be ignored and will add to the traffic passing through the village, this passes within feet of the School. Somerleyton green corner will become a major hazard with a blind junction.

Summary There is no reason to proceed with the current plans which are more to comply with Government proposals than to preserve Somerleyton and enhance the quality of village life. Please consider Somerleyton

Some development on the field at the corner of Slugs Lane and Herringfleet Road could be done as this would permit suitable roadworks and pedestrian/cycle access to the Green and School via the allotments.

Quality infill may be considered.

No need for low quality / affordable housing the village has many already

Attached documents
Ashby, Herringfleet and Somerleyton Parish Council S H Read

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 529

Comment Policy WLP7.6 The Parish Council agrees in principle that housing development in this area would be appropriate and welcomes, in general, the site specific conditions but it wishes the proposal to be amended as follows:

* The proposal for 45 dwellings is excessive because this would be a very large percentage increase in the number of dwellings in the village in a very short period of time. Only the field currently farmed should be developed and the two small fields to the East should not be developed as part of this Local Plan, although the specification for at least 0.5 hectare of open land at the North of the site should be retained.

* The density of the development should be 15 dwellings per hectare rather than the suggested 18 to better reflect the general density within the village.

* Policy WLP8.2 would require that 35% of the dwellings on this site should be affordable housing. Given the shortage of social housing in the parishes this allocation should be strictly adhered to on this site with no trade-offs under the terms of WLP8.2 permitted.

Attached documents
Gerda Gibbs

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 662

Comment

* The proposal for 45 dwellings is excessive because this would be a very large percentage increase in the number of dwellings in the village in a very short period of time. Only the field currently farmed should be developed and the two small fields to the east should not be developed as part of this Local Plan.

* The hedge between the cultivated land and the two smaller fields should remain.

* The density of the development should be 15 dwellings per hectare rather than the suggested 18 to better reflect the general density within the village.

* 35% of the dwellings on this site should be affordable housing.

* The village have a high number of very large houses and therefore the majority of the proposed houses on this field should have a maximum number of 3 bedrooms per dwelling.

* To reflect the character of the village there should be green spaces and trees between the houses.

Given the character and quality of the village and that one site is within the Conservation Area and the other adjacent to it the proposed houses should have off road parking and must be of outstanding design.

Attached documents
Graham Lloyd

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 985

Comment Our comments are relate to Policy WLP 7.6 only

1, This site is greenfield. There are suitable brownfield sites and areas nor suitable for farming in the village which could be used.

2, Putting 45 dwellings in the southern part of this site is excessive and not in keeping with any existing developments in the village. When roads, footpaths, driveways and car parking areas are included there will be little space for landscaping or open green spaces mentioned in this proposal and would be more akin to a city location than a quiet village. Added to the other proposed new houses this would be a 33% increase to existing housing which would impact the rural ambience and amenity of the village.

3, Why is access to the site from station road ? Why not directly form the street ? The turning could use part of the existing access to the "Common" area. This would reduce impact on Station Road which has no footpaths and is very narrow. Access to station road should only be pedestrian and cycles.

4, The visual amenity of the 15 or so houses which overlook this site would be be severley impacted by such a large development.

Attached documents
Historic England

Section  WLP7.6 - Mill Farm Field, Somerleyton

Comment ID  1388

Comment  We are concerned about the impact of development as proposed in the both allocations in Somerleyton. Whilst there is potential for enhancement with the replacement of the former garage and workshop in WLP7.5, the impact that the allotment development would have on the conservation area and adjacent heritage assets, which are part of the estate village for Somerleyton House, does not appear to have been fully considered.

Whilst we note the 18 dwellings per hectare density for WLP7.6, consideration should be given to the current settlement pattern of the village as to a suitable distribution and quantum of housing for the site. The policy sets out a number of ideas which would be best expressed in an indicative masterplan, as used elsewhere in this document.

Attached documents
Michael and Carolyn Greer Walker

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 512

Comment Many residents, ourselves included, would prefer no development. However if there has to be some, it should be in keeping with the village in style and size.

The proposed developments of 10 houses at the old garage site, and 45 houses on Mill Field and The Common, would considerably increase the size of the village, out of proportion. Somerleyton has 1, no room in the school, 2, no shop, 3, no bus service, 4, both Station Road and Slug's Lane are very narrow, without pavements, and unsuitable for potentially 100+ more cars on those roads.

Previous developments in the past 50 years, of Morton Peto Close, and Marsh Lane have not been of such density.

We would suggest that if planning is granted the number of houses be significantly reduced.

Attached documents
Nicola Mathers

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 116

Comment We need more housing in this village. It should, as the plan suggests be of a unique design to keep in tune with the village. Density should be low. As many as possible of the dwellings should be genuinely affordable either for rent or to buy. Maybe there could be a clause added that any social housing is not to be resold on the open market. There is very little social housing in the village, if local families want to stay they have to rent from the Somerleyton Estate. Rents in these houses are above the local housing allowance, the tenancies are short term and some properties are not in good order. It would enable the village to keep alive the school open and give young families the chance to live in a country area. I hope that any development is not just for the comfortably off older buyer.

This site is a good choice as it is in the centre of the village.

I would ask that we keep to our present policy of No street lighting

Attached documents
Simon Phillips

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 1056

Comment I support the principle of housing development on the Mill Farm Field but only the field currently farmed. The two small fields to the East, one with a pond, should not be developed during the period of this Plan. When developing this field the requirement for an open area adjacent to The Street should be retained. The density of this development should be 15 dwellings per hectare to better reflect the surrounding village.

The Affordable Housing which Policy WLP8.2 would require upon development of this site should be delivered onsite and no trade-offs (other sites, money in lieu) should be permitted in order to increase the social housing available in the village (currently 4 social rent homes - 2%).

Attached documents
Somerleyton Estate
Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 997

Comment Draft Policy WLP7.6 Mill Farm Field, Somerleyton

3.19 The draft local plan proposes to allocate Mill Farm Field for 45 dwellings.

3.20 Mill Farm Field was submitted by The Somerleyton Estate at the call for sites stage and remains available, achievable and deliverable going forwards.

3.21 The Somerleyton Estate support the draft policy WLP7.6 in principle and the proposed site specific criteria, noting in particular the criteria requiring exceptional quality of design as this echoes the Estate's vision for development in the village.

3.22 Indeed, the Somerleyton Estate have been considering who would be appropriate to deliver the new properties and have therefore entered into initial conversations with premium house builder, Hopkins Homes. The Somerleyton Estate believes they will bring the high level of design required by this policy and are currently in the process of drawing up more detailed designs for consideration.

3.23 The Somerleyton Estate also supports the principle of the preparation of a design brief either through the neighbourhood plan or via an SPD. The Somerleyton Estate would be especially keen to work directly with relevant parties in the production of such a document.

3.24 For clarity policy WLP7.6 should set out the circumstances in which the LPA anticipates that an SPD would be developed in preference to the neighbourhood plan if it appeared that the Somerleyton neighbourhood plan was not advancing.
Attached documents
Suffolk County Council Robert Feakes

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 1650

Comment Policy 5 of the Minerals Core Strategy safeguards sand and gravel resources identified using data available from the British Geological Survey. The County Council will safeguard any site within the identified minerals consultation area from proposed development in excess of one hectare or areas falling within 250m of sites within the Specific Site Allocation DPD. The following allocations are larger than one hectare and within the consultation area, however this is no reason to prevent the allocation of these sites as the County Council believes it to be unlikely that these sites would be exploited for minerals. The County Council will still need to be consulted as the minerals planning authority if planning applications do come forward on these sites, and would request consideration is given to using some of the on-site mineral resource in any resulting development, to reduce the amount of material transported on and off the site.

• Housing Allocation Policy WLP7.6

Attached documents
**Suffolk County Council Robert Feakes**

<table>
<thead>
<tr>
<th>Section</th>
<th>WLP7.6 - Mill Farm Field, Somerleyton</th>
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<tr>
<td>Comment ID</td>
<td>1728</td>
</tr>
<tr>
<td>Comment</td>
<td>Provide footway along site frontage and sustainable links through site</td>
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</tbody>
</table>

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.6 - Mill Farm Field, Somerleyton

Comment ID 715

Comment Include within the policy the requirement for a heritage asset assessment to be undertaken by a suitably qualified person as part of any planning permission in order to fully consider the impacts upon designated heritage assets including listed buildings, setting of conservation area and historic park and garden.

Attached documents
WLP7.7 - Land North of Elms Lane, Wangford

Fionna Turner

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 646

Comment As per your email could I please use this address to register my objections to the proposed development in Elms Lane.

1. Egress and access for this 16 home site is severely compromised. Elms Lane is a very narrow single track road with high hedges either side. At the bottom end there is a very busy veterinary practice with vehicles constantly coming and going. This, together with existing parking for the residents there, means that it will become a complete bottle neck.

2. The type of housing proposed would be quite out of character to the rest of the village. This estate of 1.5 story housing would be quite out of nature compared to the linear Wangford village with its mixed historical housing which has evolved architecturally. Are these houses just to swell the village population or are they likely to be second homes and holiday lets? The size of the plot for 16 houses would suggest that non-social family housing is being considered.

3. On a social level there is no pre-school or primary school provision in the village. To get to school the flow of traffic would have to cross the A12, which is a very busy road, or overload Elms Lane which is the only alternative route.

4. In provision of utilities and services, what overhead and buried water infrastructures would have to be rerouted? If these were to be replaced or added to what environmentally green issues are to be considered in sewage, waste disposal and energy provision to the site. There is also the provision of architectural finds in this site. What efforts would be made to search the site?

5. The alternative site WLP7.8 in your Wangford development site could hold this housing with better egress and access as it is without the
constrictions of Elms Lane.

6. Elms Lane itself is sometimes overwhelmed with agricultural vehicles, especially when harvesting sugar beet as there are often trains of heavy vehicles using the lane to gain access to the hard standing at the top of the lane.

These lorries already cause traffic flow problems, with fences, road signs and curbing being damaged by large agricultural vehicles making their way into and out of the village.

7. There is an existing problem from agricultural farm machinery with noise and lights at all hours, especially during harvesting. There are no substantive field boundaries or hedges so during planting and harvesting there is much wind born soil, herbicides and fertilisers in the air which invade the surrounding land.

Attached documents
Dear Sir or Madam, I have concerns about the siting of the proposed 16 houses at this location. Elms Lane is a very narrow road with few passing places. There are none on this part of Elms Lane. There are already problems with the amount of traffic that uses the road as a cut through and it is particularly bad if the A12 is closed between Norfolk Road and Elms Lane. This is exacerbated by poor driving by people visiting the Vets Surgery at Pound Corner when entering Elms Lane and also leaving the car park. Extra traffic will increase the likelihood of vehicular accidents.

The surface water drainage system in the village of Wangford is very old and there are already problems sustaining good surface drainage when there is heavy rain. Adding further properties will have an adverse effect on the drainage system and surface water flowing down Elms Lane into Norfolk Road and the junction with the A12. The sewerage system in Wangford is also extremely old and there have been problems with maintaining good flow in the lower part of the village. It is of great concern that an increase in properties will make this a real problem.
Graham Scriven

Section | WLP7.7 - Land North of Elms Lane, Wangford

Comment ID | 455

Comment | Comments on Waveney Local Plan – Land north or Elms Lane, Wangford.

WLP7.7

This is a smaller site than that proposed in the first draft of the local plan but has many of the same problems.

Wangford has no school, a mobile library visits once a month and an outreach Post Office visits for just two hours twice a week, so of limited, or no use to working people and is often cancelled because of computer or other problems.

The site is outside the village envelope and situated in an Area of Outstanding Natural Beauty so overriding your own planning advice.

Building on this site will have an impact on both the foul water and surface water networks in the village. Who will fund the improvements to these networks, which were thought necessary by Anglian Water when they commented on the first draft?

There is a large water main running across the entire site, supplying Southwold with their needs, can houses be built over this?

Any development will cause more traffic in the lane which is extremely narrow. The entrance to the lane next to the vets building is a pinch point and is too narrow for two vehicles to pass. The plan mentions the current footpath, which is short but it would be difficult to extend further because there is not enough width to allow it at the entrance to the lane.

The lane is the only safe cycle route out of the village. The plan acknowledges that the Southwold road is unsafe to be used by cyclists.

How will the hedgerow along both sides of the lane be protected from being grubbed out by developers? This is an old established hedge used by birds and mammals for nesting and feeding. Would the hedge be removed
if a footpath were built?

There are badger's setts close by this site and any development would disturb the setts and also cut off the badger's access to their foraging and feeding areas.

Will any development support the village community as reasoned in the plan? How can it be guaranteed that the housing will not be used as second homes or holiday lets, as so many others in the village are? What gain to the village then?

Graham and Joy Scriven

Attached documents
Historic England

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 1390

Comment We note that both proposed site allocations border the conservation area and this is not reflected in the supporting text or policy for each site.

Attached documents
John Turner

Section
WLP7.7 - Land North of Elms Lane, Wangford

Comment ID
94

Comment
Objections: Loss of a greenfield agricultural site.

Egress and access for 16 home site would result in overloading the at peak travel times at the junction, and compromise the established parking to existing properties in Elms lane. This road route to the properties concludes in the single track high banked Elms Lane and overwhmels the provision geographically.

What presumption has been made to the 16 family houses in this unnatural, 'housing estate' type development. This estate of housing would be quite out of nature to the linear Wangford village with mixed historical housing in a different balance of contrast to the architecturally evolved village houses.

Are these 16 homes just to swell the Wangford village established and growing 20% of second homes and holiday let properties. The size of the plot for 16 houses suggest a non social housing is being considered.

On a social level there is no pre school or primary school provision in the village and would require outside provision. The flow of traffic on the school run to this educational provision would be outside the Wangford Village. This transport would be dangerous in nature of crossing the A12 junction and would overload the alternative routes on using the single track Wangford lane.

In provision of utilities and services, what environmentally green issues are to be considered in sewage, waste disposal and energy provision to the site of the proposed 16 home site.

Attached documents
Lloyd Scriven

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 425

Comment Reference: WLP7.7

We are writing with regards to the land to the north of Elms Lane, Wangford, reference WLP7.7 being included in the draft local plan as a site for potential development.

We are strongly opposed to this site being included for a number of reasons and consider this site to be unsuitable for development.

* Development of this green field site would have a significant adverse effect on the AONB and compromise the AONB designation. This is listed as a reason why the larger site proposed initially was discounted, reference page 680-682 of Analysis of the 'Options for the new Waveney Local Plan'

* Development of this site, adjacent to the listed buildings would have an adverse impact on the character of the area and also adversely affect a part of Wangford that contributes to the rural setting of the village.

* The proposed site is outside the settlement boundaries of Wangford. As a larger village, any development outside settlement boundaries is limited to affordable housing under policy WLP8.6. This new policy allows for a 'small number of exceptions' to be built outside the settlement boundaries. As there are 16 dwellings proposed, it is suggested that this is not a small number of exceptions and that these should be removed, or at least reduced in number. Additionally, a further 22 dwellings are proposed elsewhere in Wangford, reference WLP7.8 that are also outside the settlement boundaries, again, not a small number of exceptions. It should also be noted that no development is proposed in this plan within the settlement boundaries of Wangford.

* Access to Elms Lane from Norfolk Road is very narrow and any development would cause a large increase in traffic at a point where there is no potential for improvement. Access from the north of Elms Lane is via a narrow lane which again does not have capacity for a large increase in
traffic.

* The area to the west of the site is not scrub area as stated on page 682 of Analysis of the 'Options for the new Waveney Local Plan'. This is garden belonging to Mill House.

* Significant recent investment has been made into landscaping at Mill House to enable appreciation of the rural views, these views would be lost if the site were developed.

* Development of this site would have an adverse effect on the residential amenity of all neighbouring properties but in particular both Mill House and Red House by reason of noise, loss of privacy & loss of views.

* There are badger setts in the area immediately to the west of the proposed development site. Any development would almost certainly disturb these setts and destroy the local habitat.

* Waveney District Council's current adopted core strategy, policy CS16 states it will 'protect and enhance the natural and historic environment in the district' - development of this site would be contrary to this statement.

* The schools within catchment area are currently oversubscribed and any additional places required could not be accommodated.

* Wangford Post Office is an outreach Post Office only and when open, it is at very limited times, a maximum of 4 hours per week so of limited or no use to most.

* Further to the above, we feel that writing new policies such as WLP8.6 that allow large scale development outside settlement boundaries and within an AONB, which normally would be dismissed, is not an acceptable solution to the perceived shortage of housing within Wangford and we urge you to remove this site from the draft local plan.

* Yours Sincerely

* Lloyd & Alexandra Scriven

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 810

Comment Development on this site will need to satisfy the tests of NPPF 115 and 116 and would be considered to be major development within the AONB.

7.67 We do not consider it is possible to state that the site will have only a limited impact unless landscape assessment work has been carried out. We consider that judgement on the severity of the impact upon the AONB should be reserved for when details of proposals are defined.

7.68 A Landscape and Visual Impact Assessment will need to be submitted, which will identify impacts on the landscape character and special qualities of the AONB. This should inform appropriate mitigation and enhancement of local landscape character.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 1632

Comment • WLP 7.7 (page 142) The policy requiring upfront work (and supporting text 7.7) is sound, but in fact, based on the revised area as considerably reduced from one commented on at Issues and Option stage, SCC would be likely to advise that archaeological work could be undertaken as a condition on consent.
Suffolk County Council Robert Feakes

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 1688

Comment Depending on sites previous use for mineral extraction their may be an inability to infiltrate, potential contaminants.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 1729

Comment Provide footway along site frontage and link to existing where feasible

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 716

Comment We recommend that the policy includes reference to the site being within the AONB and is cross referenced to policy WLP8.33 Landscape Character to recognise the sensitivity of the site

Attached documents
Susan Mobbs

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 23

Comment Please could you let me have more information about the mix of housing on this site. I would like to see affordable housing and social housing dominate this site. The community would benefit from younger families coming in as the population has a majority of older people. Also Wangford is close to Southwold and the number of second homes is increasing.

I am concerned about the hedgerow along Elms Lane. The lane is old, and deeply cut because of its history. (The laden carts going up to the old Maltings, now housing, and Elms Farm.) It would be sad to lose the character of the lane, I would like to see the hedgerow preserved as it is.

Susan Mobbs

Attached documents
Wangford with Henham Parish Council Jean Brown

Section WLP7.7 - Land North of Elms Lane, Wangford

Comment ID 1578

Comment First Draft Plan, July 2017 - Policy WLP7.7 - Land North of Elms Lane, Wangford and Policy WLP7.8 - Land North of Wangford Road, Wangford

I write to inform you that at this stage my Council have no objections to the above proposals but reserve the right to make further comments if necessary as the Plan processes.

Attached documents
WLP7.8 - Land North of Wangford Road, Wangford

Alan Thomas

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 69

Comment I regard the use of agricultural land for housing use in an AONB to be misplaced. Brownfield sites must always take precedence despite the protestations of developers who will always prefer the lower costs associated with greenfield sites. The suggestion that Wangford has not had any development for sometime and is therefore due some, is not a convincing argument in its favour.

The premise that the site will be developed at a density of approx 20 dwellings per hectare is optimistic. Once given housing development status the local planning authority will find great difficulty refusing applications for a significantly higher density, particularly when faced with sophisticated and persuasive arguments.

The residents and visitors to Wangford enjoy unrivaled pastoral views. To remove these for all-time, when less sensitive sights are available will I believe be a sad mistake.

Attached documents
Chapman

Section  
WLP7.8 - Land North of Wangford Road, Wangford

Comment ID  
1162

Comment  
Thank you for the opportunity to comment on the above as owners of 79 Norfolk Road, Wangford.

The first draft plan includes two sites of 16 and 22 dwellings, totalling 38 for a village of 345, more than 10% increase. In recent times many existing properties are not permanently occupied being holiday homes or to let. Several houses on the market for sale have taken many months to attract any interested buyers. Any further increase in houses would further attract not local occupiers but more absent land lords and existing local residents would be adversely affected.

Access to both sites is problematic and could cause safety issues.

In referring this to the Parish Council Clerk we were informed that these draft proposals had not been put officially before them or had been on any agenda for discussion which would seem very relevant in a plan of this importance.

In light of the above we object to these proposals and suggest that they be refused.

Doug and Maria Chapman

Attached documents
Clare Clarke

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 1145

Comment I am writing to object to the proposed development of land to the north of Wangford Road, Wangford (WLP7.8) for the following reasons:

1. The proposed development is in an area of outstanding natural beauty that is highly sensitive to new development. The development will destroy wildlife, vegetation and a stunning landscape. You state that the local economy is heavily dependent on tourism. I would argue that any development that interferes with the area's designation as an 'area of outstanding natural beauty' will have a detrimental impact on the local economy. I am a regular visitor to the area who comes to enjoy the beautiful countryside and stunning, rural vistas. Ill-thought through development will likely have a malign impact on the desirability of the area as a tourist destination.

2. The need for further housing in the village is doubtful. There are currently properties for sale in the village, two thirds of which, are priced at below the average house price in England (source: UK Government House Price Index). I can only assume therefore, that the that new houses will be occupied by non-local people and highly likely by people acquiring a second home in the area. I therefore conclude that the key beneficiary of any development will be those who stand to make a financial gain from the proposed development rather than members of the local community.

3. The proposed development is located at a very dangerous bend in the Norfolk Road. There is currently no pavement and visibility coming round the corner is poor. The proposed entrance to the site would be close to this dangerous bend in the road and pedestrian access to the village would be hazardous, particularly for vulnerable people such as the elderly and children. Furthermore, you suggest that this plot would not require play facilities for children as there is adequate provision in the the village. To suggest that children would be expected to walk along such a dangerous stretch of road to reach village amenities is irresponsible.
4. There is currently no educational provision in Wangford. Children occupying houses on the new development would need to travel to school each day, possibly as far as Lowestoft, Bungagy and Beccles. This will clearly necessitate children being driven to school, which appears to be at odds with the concerns set out in the ‘key issues’ section of the draft plan, in which the council states that low levels of exercise and obesity are causes for concern in the region. Surely an excellent way to address this would be to ensure that school children are able to walk to and from school?

Yours sincerely

Clare Clarke

Attached documents
Daniel Clarke

Section
WLP7.8 - Land North of Wangford Road, Wangford

Comment ID
1158

Comment
I would like to object to the proposed development of land in Wangford Road, Wangford (WLP7.8). My objections are as follows:

1. Environmental: The proposed site is in an area of outstanding natural beauty. I am concerned that the countryside around Wangford should be preserved for future generations and that other, more suitable, brownfield sites should be used for housing. I am also concerned that this could open the gates for further development, leading to urban sprawl in the direction of Reydon, as well as compromise the historical charm and character of the village of Wangford.

2. Traffic: The new housing development will lead to increased traffic coming through the village, leading to congestion and air pollution. There are no schools in the village, employment opportunities are limited and the nearest main shopping centre is in Lowestoft. This means that residents will be forced to take to their cars for the necessities of day-to-day living. This is particularly relevant as the location of the proposed site means that traffic would leave the A12 and have to drive through the village along the B1126 for access.

3. Safety: The position of the proposed new development is at a dangerous bend on the Norfolk Road. Traffic already approaches the village at speed and an access road positioned close to the bend would make the road even more perilous. Furthermore, there is no pedestrian pavement along this stretch of road, making access to the village centre challenging.

4. Local residents: I am sceptical as to whether additional housing will serve the local community or simply add to the stock of housing available to second home owners, particularly given its proximity to Southwold. I would suggest that preference might be given to sites further inland and away from popular coastal resorts, might help mitigate this risk and ensure that additional housing stock would remain the preserve of Suffolk residents.
Yours sincerely

Daniel Clarke

Attached documents
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<tr>
<th><strong>Fionna Turner</strong></th>
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<td><strong>Section</strong></td>
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<td><strong>Comment</strong></td>
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<td><strong>Attached documents</strong></td>
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</tbody>
</table>
Geoff Pepper

Section  WLP7.8 - Land North of Wangford Road, Wangford

Comment ID  379

Comment  Dear Sir or Madam,

I am very concerned at this proposal on the following grounds:

This proposed development is to be accessed onto a busy road with a sharp bend that will make entry onto Wangford Hill dangerous. There are no pavements on Wangford Hill.

The sewerage system in Wangford is very old and building additional properties will exacerbate the existing problems if no upgrade to the system is carried out.

The proposed site will have a negative impact on the aesthetic appeal of the village as you enter Wangford from Reydon. This development will have a negative impact on those properties on Norfolk Road that have, at present, an uninterrupted view across open fields towards Reydon Wood. Consideration to the owners of these properties should be given with regard to the likely reduction in the value of their properties.

Attached documents
Historic England

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 1391

Comment We note that both proposed site allocations border the conservation area and this is not reflected in the supporting text or policy for each site.

Attached documents
Janet Thomas

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 75

Comment The proposed site lies at the intersection of the historical gateway to the village from Southwold and in an area of outstanding natural beauty and I am at a loss to understand why valuable farmland in this location could possibly be considered for housing development. There appears to be no overriding argument why any large scale development needs to be considered in this particular area. Wangford is a small self-contained, attractive community surrounded by magnificent countryside and I disapprove of this site being included in the draft local plan for housing in the strongest possible terms.

Attached documents
Janice Morley

Section  WLP7.8 - Land North of Wangford Road, Wangford

Comment ID  549

Comment  Dear Sirs,

I wish to object to Policy WLP7.8 relating to the land North of Wangford Road, Wangford.

I submit that the policy is irrational or otherwise inappropriate for the following reasons:

- A development of this size and at this location would have an inappropriate and detrimental impact on the village, the wider Area of Outstanding Natural Beauty and views of the historic village when approached from the East;

- It is suggested that the majority of the housing at site WLP7.8 is to have a plot size which reflects the housing located along Norfolk Road and the historic buildings in the village. This suggests that the plot sizes will be small, notwithstanding the fact that the historic buildings in the village are, on the main, very small and inappropriate equipped to accommodate vehicles;

- No rationale has been given for proposed higher density development at this site when compared to the site at Policy WLP7.7;

- The land at this site is not bordered by a "hard boundary" (unlike like land close to the East of site WLP7.7 which, if extended, could be bordered by the hard boundary that is the A12 dual carriage way). Site WLP7.8 is, therefore, less suitable and would likely be a candidate for further future growth and development sprawl;

- Access to site WLP7.8 would be gained from B1126. Any such access would be close to a bend in the road and would incur inappropriate risk;

- A large "block" development such as that this proposal would be inimical to the generally linear development in Wangford, which is focused upon the High Street and B1126. Such a development would undermine the
nature of the conversation area.

- The stated strategy for Wangford is to "enable a limited amount of housing development to support people in the village with a variety of housing tenures and types while not compromising the village's setting within the Area of Outstanding Natural Beauty. New housing at two individual sites will provide an opportunity to improve existing community facilities". However, the plan does not specify what opportunities there will be to improve existing community facilities. Furthermore, there is no demonstrated demand for the growth of the village to "support people in the village".

- The site does not have easy pedestrian access to the village. Indeed, pedestrian access to the village is likely to be along a busy road;

- Properties envisaged are clearly intended for young families and will necessitate car journeys along country lanes to take children to primary school;

- There is no identified need for this scale of new housing in Wangford and will necessitate families being relocated into the village from outside, particularly to fill the social housing element of any development;

- Any future development on this site will significantly increase traffic flow through the centre of the village from the A12; and

- The proposed inclusion of this site in the draft local plan has far more to do with the financial interests of a large local landowner than any perceived benefits to the village. It is inappropriate to adopt such criteria.

- The topography of the site at WLP7.8 is such that it is at a higher location than many of the other parts of the village, including houses immediately to the West along Norfolk Road. Accordingly, any new development will inappropriately dominate the locality and have a disproportionate effect on the village, surrounding properties and landscape.

Yours faithfully,

Janice Morley (Mrs)

Attached documents
Dear Sirs,

I wish to object to Policy WLP7.8 relating to the land North of Wangford Road, Wangford.

I submit that the policy is irrational or otherwise inappropriate for the following reasons:

- A development of this size and at this location would have an inappropriate and detrimental impact on the village, the wider Area of Outstanding Natural Beauty and views of the historic village when approached from the East;

- It is suggested that the majority of the housing at site WLP7.8 is to have a plot size which reflects the housing located along Norfolk Road and the historic buildings in the village. This suggests that the plot sizes will be small, notwithstanding the fact that the historic buildings in the village are, on the main, very small and inappropriate equipped to accommodate vehicles;

- No rationale has been given for proposed higher density development at this site when compared to the site at Policy WLP7.7;  

- The land at this site is not bordered by a "hard boundary" (unlike like land close to the East of site WLP7.7 which, if extended, could be bordered by the hard boundary that is the A12 dual carriage way). Site WLP7.8 is, therefore, less suitable and would likely be a candidate for further future growth and development sprawl;

- Access to site WLP7.8 would be gained from B1126. Any such access would be close to a bend in the road and would incur inappropriate risk;

- A large "block" development such as that this proposal would be inimical to the generally linear development in Wangford, which is focused upon the High Street and B1126. Such a development would undermine the
nature of the conversation area.

- The stated strategy for Wangford is to "enable a limited amount of housing development to support people in the village with a variety of housing tenures and types while not compromising the village's setting within the Area of Outstanding Natural Beauty. New housing at two individual sites will provide an opportunity to improve existing community facilities". However, the plan does not specify what opportunities there will be to improve existing community facilities. Furthermore, there is no demonstrated demand for the growth of the village to "support people in the village".

- The site does not have easy pedestrian access to the village. Indeed, pedestrian access to the village is likely to be along a busy road;

- Properties envisaged are clearly intended for young families and will necessitate car journeys along country lanes to take children to primary school;

- There is no identified need for this scale of new housing in Wangford and will necessitate families being relocated into the village from outside, particularly to fill the social housing element of any development;

- Any future development on this site will significantly increase traffic flow through the centre of the village from the A12; and

- The proposed inclusion of this site in the draft local plan has far more to do with the financial interests of a large local landowner than any perceived benefits to the village. It is inappropriate to adopt such criteria.

- The topography of the site at WLP7.8 is such that it is at a higher location than many of the other parts of the village, including houses immediately to the West along Norfolk Road. Accordingly, any new development will inappropriately dominate the locality and have a disproportionate effect on the village, surrounding properties and landscape.

Yours faithfully,

John Morley

Attached documents
Dear Sirs

I write to express my strong objection to the inclusion of Land North of Wangford Road, Wangford. WLP 7.8 in the Waverny daft local plan. I object on the following grounds;

* Development of this site would have a detrimental impact on the village and Area of Outstanding Natural Beauty;

* Access to any proposed development will be dangerously close to the sharp bend as Norfolk Road runs into Wangford Road;

* Development on this site will significantly increase traffic flow through the centre of the village from the A12;

* Pedestrian access from the site into the village is along a busy road and would be dangerous;

* Any development on this site would inevitably lead to further development sprawl. Unlike site WLP7.7 where further development would be restricted by the A14 dual carriageway;

* Properties envisaged are clearly intended for young families and will necessitate car journeys along country lanes to take children to primary school;

* There is no identified need for this scale of new housing in Wangford and will necessitate families being relocated into the village from outside, particularly to fill the social housing element of any development;

* The proposed inclusion of this site in the draft local plan has far more to do with the financial interests of a large local landowner than any perceived benefits to the village, this criteria is inappropriate.

Yours faithfully
Louise Stuttard

Attached documents
Mark Thomas

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 413

Comment Dear Sirs,

I wish to object to Policy WLP7.8 relating to the land North of Wangford Road, Wangford.

I submit that the policy is irrational or otherwise inappropriate for the following reasons:

- A development of this size and at this location would have an inappropriate and detrimental impact on the village, the wider Area of Outstanding Natural Beauty and views of the historic village when approached from the East;

- It is suggested that the majority of the housing at site WLP7.8 is to have a plot size which reflects the housing located along Norfolk Road and the historic buildings in the village. This suggests that the plot sizes will be small, notwithstanding the fact that the historic buildings in the village are, on the main, very small and inappropriate equipped to accommodate vehicles;

- No rationale has been given for proposed higher density development at this site when compared to the site at Policy WLP7.7;

- The land at this site is not bordered by a "hard boundary" (unlike like land close to the East of site WLP7.7 which, if extended, could be bordered by the hard boundary that is the A12 dual carriage way). Site WLP7.8 is, therefore, less suitable and would likely be a candidate for further future growth and development sprawl;

- Access to site WLP7.8 would be gained from B1126. Any such access would be close to a bend in the road and would incur inappropriate risk;

- A large "block" development such as that this proposal would be inimical to the generally linear development in Wangford, which is focused upon the High Street and B1126. Such a development would undermine the
nature of the conversation area.

- The stated strategy for Wangford is to "enable a limited amount of housing development to support people in the village with a variety of housing tenures and types while not compromising the village's setting within the Area of Outstanding Natural Beauty. New housing at two individual sites will provide an opportunity to improve existing community facilities". However, the plan does not specify what opportunities there will be to improve existing community facilities. Furthermore, there is no demonstrated demand for the growth of the village to "support people in the village".

- The site does not have easy pedestrian access to the village. Indeed, pedestrian access to the village is likely to be along a busy road;

- Properties envisaged are clearly intended for young families and will necessitate car journeys along country lanes to take children to primary school;

- There is no identified need for this scale of new housing in Wangford and will necessitate families being relocated into the village from outside, particularly to fill the social housing element of any development;

- Any future development on this site will significantly increase traffic flow through the centre of the village from the A12; and

- The proposed inclusion of this site in the draft local plan has far more to do with the financial interests of a large local landowner than any perceived benefits to the village. It is inappropriate to adopt such criteria.

Yours faithfully,

Mark Thomas

Attached documents
Crawford

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 546

Comment
Your Reference 7.71 Wangford Road is nowhere near wide enough for access to the proposed site. There are no pavements and the part of road that would be affected has three blind bends within a short distance. The most dangerous being at the end of Norfolk road joining Wangford Hill.

Your Reference 7.72 The proposed site would be on the other side of the village to the services mentioned and therefore would increase traffic volume through Norfolk Road and Church Street which are already over used and have limited pavement access especially the ends of both roads adjoining Wangford Hill.

The bus services that runs along Wangford Hill does not stop at the designated bus stop in this road because it is too dangerous with the blind bend and it would totally block the traffic.

Your Reference 7.73 The site has a high point in the middle of the land running north to south in the middle which leads to bad drainage issues during heavy rainfall to the site and our back gardens.

The alternative Option No 30 (only found in your summary newspaper but not in the other documents) on Elms Lane seems to be for everybody we have spoken to in the village a much better option for several reasons:-

1) Far better access to the village and the A12 (under WLP 7.7 Elms Lane would have to be modified anyway).

2) Better placed for incoming services sewage, gas, electric etc.

3) The development all under one scheme in the same place leading to less disruption for the village as a whole and indeed Reydon/Southwold.

4) No impact from surface water in terms of land drainage.

5) Easier access to services within the village eg pavements already in situ.
6) Less traffic along Norfolk Road which is already the busiest over used road in the village.

Attached documents
Natalie Morley

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 417

Comment

Dear Sirs,

I wish to object to Policy WLP7.8 relating to the land North of Wangford Road, Wangford.

I submit that the policy is irrational or otherwise inappropriate for the following reasons:

- A development of this size and at this location would have an inappropriate and detrimental impact on the village, the wider Area of Outstanding Natural Beauty and views of the historic village when approached from the East;

- It is suggested that the majority of the housing at site WLP7.8 is to have a plot size which reflects the housing located along Norfolk Road and the historic buildings in the village. This suggests that the plot sizes will be small, notwithstanding the fact that the historic buildings in the village are, on the main, very small and inappropriate equipped to accommodate vehicles;

- No rationale has been given for proposed higher density development at this site when compared to the site at Policy WLP7.7;

- The land at this site is not bordered by a "hard boundary" (unlike like land close to the East of site WLP7.7 which, if extended, could be bordered by the hard boundary that is the A14 dual carriage way). Site WLP7.8 is, therefore, less suitable and would likely be a candidate for further future growth and development sprawl;

- Access to site WLP7.8 would be gained from B1126. Any such access would be close to a bend in the road and would incur inappropriate risk;

- A large "block" development such as that this proposal would be inimical to the generally linear development in Wangford, which is focused upon the High Street and B1126. Such a development would undermine the
nature of the conversation area.

- The stated strategy for Wangford is to "enable a limited amount of housing development to support people in the village with a variety of housing tenures and types while not compromising the village's setting within the Area of Outstanding Natural Beauty. New housing at two individual sites will provide an opportunity to improve existing community facilities". However, the plan does not specify what opportunities there will be to improve existing community facilities. Furthermore, there is no demonstrated demand for the growth of the village to "support people in the village".

- The site does not have easy pedestrian access to the village. Indeed, pedestrian access to the village is likely to be along a busy road;

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- There is no identified need for this scale of new housing in Wangford and will necessitate families being relocated into the village from outside, particularly to fill the social housing element of any development;

- Any future development on this site will significantly increase traffic flow through the centre of the village from the A12; and

- The proposed inclusion of this site in the draft local plan has far more to do with the financial interests of a large local landowner than any perceived benefits to the village. It is inappropriate to adopt such criteria.

Regards,

Natalie Morley

Attached documents
Suffolk County Council Robert Feakes

Section   WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 1633

Comment   • WLP 7.8 (page 143-4) – this site was not previously included in the Issues and Options. The policy requiring upfront work (and supporting text 7.7) is sound, but on balance, the County Council would be likely to advise that archaeological work could be undertaken as a condition on consent and Waveney may wish to change the wording here so that the supporting text and policy refers to a condition using Waveney's wording for this clause as adopted throughout.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 1730

Comment Provide sustainable link to village centre. Concerns if not feasible.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 1689

Comment Small pocket of 1 in 100 surface water flood risk on western boundary.

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.8 - Land North of Wangford Road, Wangford

Comment ID 717

Comment We recommend that the policy includes reference to the site being within the AONB and is cross referenced to policy WLP8.33 Landscape Character to recognise the sensitivity of the site.

Attached documents
Wangford with Henham Parish Council Jean Brown

Section  
WLP7.8 - Land North of Wangford Road, Wangford

Comment ID  
1579

Comment  
First Draft Plan, July 2017 - Policy WLP7.7 - Land North of Elms Lane, Wangford and Policy WLP7.8 - Land North of Wangford Road, Wangford

I write to inform you that at this stage my Council have no objections to the above proposals but reserve the right to make further comments if necessary as the Plan processes.

Attached documents
Wrentham Strategy and Site Allocations

Andy Warnes

Section Wrentham Strategy and Site Allocations

Comment ID 849

Comment Adding 80+ houses to Wrentham which has just had significant housing added by the Meadowlands development is NOT sustainable. The School traffic is already excessive with ALL children generating bus or car journeys at the same time. The small part-time surgery is already inundated by elderly patients and these housing developments just add to this particular age range.

Proposing that arbitrary 'additions' to an underused tennis court and football pitch mostly used by people having to drive to attend are adequate compensation are laughable and again unsustainable.

The current/most recent local plan proposed that the boundary to the village as it stands should be maintained and further development restricted was the right and proper decision and this most recent proposal purely being created to make up for the Waveney Councils inability to better manage is brownfield resources elsewhere as it originally promised. The existing local plan should be fully enacted, or indeed WDC should resign en-masse due to its utter failing to deliver on existing promises before making yet more, poorly conceived new ones.

Attached documents
Andy Warnes

Section Wrentham Strategy and Site Allocations

Comment ID 850

Comment Adding 86 houses or a 16% growth in housing to such a unique village as Wrentham is laughable, unsustainable and beggars belief it is even being proposed given the support resources in the village and the lack of location to add any further such requirements, such as a local School, larger surgery, dentist, chemist, all of which are currently either completely missing or available on purely a part-time basis. Yet more short car journeys will result, what a great plan!!
Benacre Estates Company Edward Vere Nicoll  
Savills (UK) Ltd (Rosanna Metcalfe)

Section | Wrentham Strategy and Site Allocations

Comment ID | 1116

Comment | On behalf of our client, The Benacre Company, Savills (UK) Ltd has been instructed to prepare representations in respect of their land interests at Wrentham in the context of Waveney District Council's consultation on the 'First Draft Local Plan, July 2017' (Regulation 18 stage). Such representations cover not only the sites themselves but also a number of Overall Spatial Strategy policies and also District Wide Strategic Planning Policies.

Land within the ownership of the Benacre Company was submitted to the Council for consideration as part of the emerging Local Plan Call for Sites in 2016. An assessment of the suitability of those sites has been carried out by the Council and resulted in the identification of two residential allocations at Wrentham – these have been given the references WLP7.9 'Land North of Chapel Road, Wrentham' and WLP7.10 'Land West of London Road, Wrentham'.

Appendices within this report on representations include plans illustrating the extent of the Benacre land ownership as it relates to the two allocated housing sites within the emerging Waveney Local Plan. These sites represent a valuable opportunity to deliver sustainable extensions to Wrentham and to provide the level of growth to assist in supporting the shops and services in the village. The Benacre Company aspire to create attractive, high quality developments that draw on the rich rural character and heritage of Wrentham as well as create a distinctive sense of place. Such objectives will be applied to the future development of these two sites.

Benacre Company land has been identified for residential allocations within the Regulation 18 Draft of the Waveney Local Plan, under the draft allocation references WLP7.9 'Land North of Chapel Road, Wrentham' and
WLP7.10 'Land West of London Road, Wrentham'. Strong support is given to both policies and we consider these sites to represent a valuable opportunity to deliver a sustainable urban extension to Wrentham and provide significant housing delivery throughout the plan period. We have expressed comments to ensure that the figures being used to estimate capacity can only be considered as "appropriate" and thus there is an inbuilt flexibility into the detailed provision of such sites.

Overall, our general support is given to aims and aspirations outlined in the draft policies contained within the Local Plan. It is however requested that the Council provides additional guidance and information to assist the plan user for Draft Policy 8.1 'Housing Mix' and Policies 7.9 and 7.10 as suggested in Section 4 of this report.

Attached documents
Wrentham Parish Council Frances Bullard

Section Wrentham Strategy and Site Allocations

Comment ID 809

Comment We have been invited to comment on whether the preferred approach set out in the Draft Waveney Local Plan is appropriate to facilitate and manage growth in the District. This was discussed at our Parish Council Meeting on Monday 18th September 2017. During the 'Options for the new Waveney Local Plan' consultation the Wrentham PC raised concerns about housing density (which is greater than on the previous plan), infrastructure, recreation space, traffic and parking in Wrentham. The PC can see these concerns, particularly regarding infrastructure, have been noted by Waveney District Council so we will look to see they are taken into account in the final version of the New Local Plan. Some specific indicators of this might include a review of local water/sewage/drainage services, road design to avoid speeding problems, off road parking which might include charging points for the electric cars of the future and road safety considerations such as a footpath to Wrentham Church.

We note Site No WLP7.9 has substantially increased in size, this area is in a flood plain and includes a purpose built pond to assist drainage, the PC has not previously been made aware of this increase and we have a high level of concern regarding this.

With that having been said, Wrentham Parish Council is satisfied with the preferred approach for the District and our Parish as set out in the first draft. Our opinion is that the development policies as outlined in that document are appropriate to facilitate and manage growth in the District.

Attached documents
Wynn

Section  Wrentham Strategy and Site Allocations

Comment ID  398

Comment  I notice that WLP7.9 is to be developed at 15 dwellings to the hectare. WLP7.10 is to be 20 dwellings to the hectare. Why?

WLP7.9 appears to have a limit on building height and distance from existing buildings whilst WLP7.10 does not. Why?

Attached documents
WLP7.9 - Land North of Chapel Road, Wrentham

Andy Warnes

Section  WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  848

Comment  Adding 60 dwellings to Wrentham, which has just had a, for its size, large quantity of dwellings recently added at Meadowlands in unsustainable. There is no School facility and adding 60 dwellings will contribute to yet more short road journeys to reach basic requirements that are not available within the village. The single part time surgery is already heavily populated with the ageing population and it is unlikely that the proposed housing will do other than add to this age group.

Further NO further greenfield sites should be added to the local plan in Waveney until the large brownfield sites in Lowestoft are FULLY developed to aid the regeneration of the Town. Without such disciplined management the local property developers will continue to prefer the easier developed Greenfield sites to the continued detriment of Lowestoft Town, unlike Norwich and Ipswich who have gentrified their old inner ports/river areas to great beneficial effect, wake-up Waveney Council and do the same!

Attached documents
Anna and David Mansfield

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 630

Comment Re: Proposed development in Wrentham North of Chapel Road

I write with grave concerns about the impact this may have on the village:

1. The egression of traffic on to Chapel Road and then on to the A12 will be insupportable. The access from Chapel Road on to the A12 is already extremely dangerous.

2. The above will be compounded there being no school in Wrentham.

3. The existing Doctor’s Surgery in Wrentham would, I fear, find great pressure with a further sixty families registering.

4. There is a village shop with a Post Office facility four days a week For how much longer?? The parking is already very limited.

5. Possible flooding should have much greater consideration.

6. Accepting the needs for more housing, how many of the proposed development will be "affordable"?

I shall be grateful for the above comments to be considered before 22nd September, with your written feedback.

Letter also signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge

Claudia Osborne
Sue Stammers

John Stammers

Attached documents
Barry Edgeley

Section  WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  1032

Comment  We are extremely concerned about the number of houses proposed for the Chapel road site in Wrentham.

Also great concern regarding infrastructure in this area as there have already been sewage and drainage problems plus large amount of heavy goods using this road as a rat run and build up of traffic at junction with A12. 60 houses with 2/3 cars per household is not an option for this area.

We are opposed to any use of this site for housing.

Note.3/4 school buses also try to stop on Chapel road every day.

Regards

B Edgeley

Attached documents
<table>
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<tr>
<th>Section</th>
<th>WLP7.9 - Land North of Chapel Road, Wrentham</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1123</td>
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<tr>
<td>Comment</td>
<td>Policy WLP7.9 allocates 4.82 hectares of land at Chapel Road for residential development. The land is entirely in the control of Benacre Estate and we would confirm that this site is deliverable. We entirely support the identification of the site for new housing in this north western location of the village. The site is physically well related to the existing village and is adjacent to the Chatten Close development which came forward in the context of the last plan. The site has the ability to deliver a high quality residential environment with the opportunity to secure appropriate landscaping to ensure a satisfactory transition between the built up area and the surrounding countryside. The site lies well contained within the landscape and its relationship to the village means that in our view, its future development would not significantly affect the open character and setting of the settlement. Appendix 1 of this report includes a plan illustrating the location of the Benacre Company land and the relationship between the site and the existing village. Appendix 2 of this report includes a Transport Technical Note. This Report concludes that vehicular access can be achieved to the site from Chapel Road via a new priority junction staggered with the existing priority junction of Chapel Road and Bonsey Gardens. The junction is suitable for the scale of development and appropriate visibility splays can be achieved. Appendix 3 of this report includes an Historic Environment Desk-Based Assessment. This report concludes that the site has low potential for prehistoric and Roman heritage assets, low to moderate of early to later medieval heritage assets and low to negligible potential for assets if any other period. Appendix 4 of this report includes a desktop investigation into flooding and</td>
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drainage matters. A small area in the north-east of the site falls within flood zones 2 and 3. A shown on the Illustrative Masterplan, no built development is proposed in these zones. The report suggests that the site conditions may support the disposal of surface water runoff by infiltration. Further investigations would be undertaken in support of a planning application. With regards to waste water management, Anglian Water has confirmed that they are able to provide a wastewater service for the proposed development via a direct connection to the wastewater pumping station to the north.

The Benacre Company aspire to create an attractive, high quality development on the site which can draw on the rich rural character and heritage of Wrentham. We consider that the development of this site will importantly deliver much needed housing for the village including the policy compliant requirement of affordable housing. The introduction of such new housing may assist people to move into these properties from existing stock but also importantly introduce potentially new residents to invest and support in the existing services and facilities that the village has to offer.

Policy WLP7.9 sets out a number of specific requirements for the proposal as discussed in turn below: The residential part of the site will be developed at "a density of approximately 15 dwellings per hectare"

We are unsure how this density figure has been reached given that the equivalent figure in Policy WLP7.10 concerning the London Road site in Wrentham seems to have been calculated on a simple gross basis. The observation is that the figure of 60 dwellings in the first sentence of the Policy should therefore be considered as an approximate figure, not an exact one. This is entirely logical since in the circumstances where the site only showed 59 dwellings or indeed 61 dwellings then the Council could say that this is not in line with the Policy. Clearly that is an unsustainable position to adopt and accordingly we suggest that the first sentence of the policy should be re-written to read:

"Land North of Chapel Road, Wrentham (4.82 hectares) as identified on the Policies Map is allocated for residential development of approximately 60 dwellings and open space"

Moreover the use of the term of "appropriate" in this context is consistent with the same term and policy thrust within Policy WLP1.1 which refers to the minimum number of dwellings and the approximate distributions spread across the policy areas in the Plan.

Notwithstanding the above, we support the allocation of the site for
Regarding the site specific criteria in the policy, we acknowledge and support the detailed issues they are seeking to make about the future development of the site. Attached at Appendix 2 to this report is a concept layout plan demonstrating how the residential layout could come forward to deliver the broad aspirations for the site. The specific criteria within the policy are underlined below and we make some brief comments on each.

Any proposal should be designed to provide a mix of housing types and sizes including single and two storey dwellings.

Support is given to the current policy wording. On behalf of our client we have attached an indicative layout to illustrate how we would seek to incorporate this design requirement into our proposed scheme. Properties along the northern boundary should have long rear gardens of approximately 40 metres facing towards the listed buildings on Priory Road.

We consider the proposed wording entirely appropriate and support the Council’s aim to preserve the setting of the locally listed buildings identified on Priory Road. Dwellings in the north part of the site and along the west boundary should be no higher than 1.5 storeys.

Support is given to the current policy wording and we consider the importance the Council has placed on safeguarding the defining characteristics of the surrounding rural area to be entirely appropriate and in accordance with Paragraph 58 of the NPPF. Low density development is to be supported with a quality landscaping scheme to provide openness on site and provide screening along the west boundary of the site.

Support is given to the current policy wording. On behalf of our client we have attached an indicative layout to illustrate how we would seek to incorporate landscaping and the openness of the area into our proposed scheme. An equipped play area equivalent to a neighbourhood equipped area for play and ancillary open space for amenity use will be provided of a size not less than 0.5 hectares. The ancillary open space should have landscaping that lends itself to natural and informal forms of play.

This criterion reflects the importance of ensuring a functional and visual relationship between built form and open space and the enclosed concept plan accommodates this element. The public open space is to be located at the south side of the site and designed to have street frontages on three sides ideally being on a corner plot.

Similar to the above, it is important that there is green space within the development.
development and of a form and scale that is appropriate to both the allocated site but also to the wider surroundings. Hedgerows and trees located along the site boundaries should be protected and reinforced where possible.

The retention of trees and hedgerows on boundaries is important and indeed it is the qualities of such boundaries that can offer design credentials and benefits to the future development of this site. A Transport Statement should be submitted with any planning application.

The requirement for a Transport Statement is supported and we consider the Council's aim to mitigate and minimise where possible the impact of new development on the surrounding highway network entirely appropriate. The Benacre Company are committed to the delivery of a sustainable development which does not create a subsequent effect on neighbouring amenity. A condition relating to an archaeological investigation will need to be attached to any planning permission.

The requirement for an archaeological investigation is supported and we consider the Council's objective to preserve the village's historic environment is in accordance with Paragraph 132 of the NPPF.

Attached documents


Claudia Osborne

Section: WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID: 1509

Comment:

Re: Proposed development in Wrentham North of Chapel Road

I write with grave concerns about the impact this may have on the village:

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2. The above will be compounded there being no school in Wrentham.

3. The existing Doctor’s Surgery in Wrentham would, I fear, find great pressure with a further sixty families registering.

4. There is a village shop with a Post Office facility four days a week For how much longer?? The parking is already very limited.

5. Possible flooding should have much greater consideration.

6. Accepting the needs for more housing, how many of the proposed development will be "affordable”?

I shall be grateful for the above comments to be considered before 22nd September, with your written feedback.

Letter written by Anna and David Mansfield

Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne
Sue Stammers
John Stammers

Attached documents
Dale Yates

Section  WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  1505

Comment  Re: Proposed development in Wrentham North of Chapel Road

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Letter written by Anna and David Mansfield

Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne

Sue Stammers

John Stammers

Attached documents
Responses to Waveney Local Plan First Draft | Consultation period 28 July to 22 September 2017

David Rogers

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1092

Comment As a resident of Chatten Close, Wrentham, I perceive a number of areas and points of concern that merit further consideration.

Land North of Chapel Road

- Location. Chapel Road is already a busy thoroughfare for traffic to and from Southwold, Beccles, Norwich and further afield. The junction at the foot of Chapel Road with the A12 and across to Southwold is extremely dangerous because of poor views in all directions. The road is also regularly used by large lorries and agricultural vehicles with the resulting adverse affect on road surface and pavements. Any increase in traffic would cause further problems, not least additional congestion and air and noise pollution, but further endanger local residents many of whom are elderly and care for grandchildren. The road itself is very narrow and has very few safe crossing-points. The road is also the direct route to schools in Southwold, Beccles and Barnaby.

- Schools. The First Draft Plan rightly acknowledges the current lack of local provision at primary school level, but fails to recognise that this is matched or even worse at secondary level. School buses (or cars) therefore transport many of our youngsters to their place of education. With families who have children at more than one school, this can be a considerable inconvenience, not least in terms of family/work logistics. We know there is a lack of secondary provision – not mentioned in The Plan – but any suggestion that there could be transport to primary school in Brampton or Kessingland would be most unwelcome and complicate issues even further.

- Employment. There are very few opportunities in the village, so most positions require transport of some kind. As already stated, this may not be practical or desirable for a number of reasons, eg. physical, logistical, environmental.

- Leisure and Entertainment. We find the village most welcoming and are
very happy to have found our final nest. However, provision for families with young children and teenagers is extremely limited.

• Shops and Local Amenities. Friendly local store (open 7 days a week) with PO facilities (limited hours 4 days a week). New owners to Fish and Chip shop appear to be doing OK (limited hours). Two pubs, both under threat.

In summary, I could not recommend Wrentham to people with young/expanding families

In the light of [my responses] and the democratic process, I trust that a major and more detailed review of the proposals contained within the First Draft will be undertaken.

Attached documents
Fiona Anderson

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 704

Comment I am writing to express my objection the plan to build 60 dwellings on land off Chapel Road, Wrentham. I do not consider this agricultural plot to be an appropriate choice for so many houses.

First of all I think it is important to maintain the rural character of this part of the village. Such a large number of new properties would have a very negative effect on the open feel this land between Chapel Road and Priory Road has. That there is risk of flooding is a further argument against the choice of this site.

Secondly, Chapel Road already carries too much traffic; many of the vehicles are too large and heavy for this narrow B road. Parked cars make this road difficult to negotiate at certain times of day and I consider it foolish to add to the present unacceptable level of traffic. The crossroads with the B 1127 and the A12 is at times dangerous with poor visibility and uncertain rights of way – more traffic would raise the level of danger here to all road users and pedestrians. As a member of the village Community Speed Watch team I already show that I am concerned with the speed and volume of traffic on our village roads. If sixty houses were built on this plot, it would seriously add to the traffic along this route making the air more polluted and add to risk of accidents.

The third reason why I object to the plan to build on this site concerns the fact that as there are no schools in the village, parents would be forced to find schooling at considerable distance from where they live. At present there is no proper provision for school buses to stop safely as there is no designated lay-by; during school term time children are at risk getting on and off buses. An increase in the local population would inevitably mean more children, both at primary and secondary level, forced to seek schooling outside the village and thus increasing traffic at peak times. I agree that recreation facilities for the young people in the village should be up-graded and integrated but this can be done without building 60
dwellings on this unsuitable site.

Attached documents
Glynis Etheridge

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1508

Comment Re: Proposed development in Wrentham North of Chapel Road

I write with grave concerns about the impact this may have on the village:

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4. There is a village shop with a Post Office facility four days a week For how much longer?? The parking is already very limited.

5. Possible flooding should have much greater consideration.

6. Accepting the needs for more housing, how many of the proposed development will be "affordable"?

I shall be grateful for the above comments to be considered before 22nd September, with your written feedback.

Letter written by Anna and David Mansfield

Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne
Sue Stammers
John Stammers

Attached documents
Historic England

Section  
WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  
1392

Comment  
The listed buildings have been identified in the supporting text and policy in generic terms, although not identified specifically – particularly the Priory and Priory Farmhouse. The conservation area has not been identified.

Attached documents
John Stammers

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1511

Comment Re: Proposed development in Wrentham North of Chapel Road

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Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne
Sue Stammers
John Stammers

Attached documents
John Tibble

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1061

Comment We would like to voice our concern on the development of 60 houses off Chapel road Wrentham

Chapel road is narrow & not suitable for heavy traffic which would come with this proposed site.

2 There are no schools in Wrentham.therefore school buses would add to the congestion.

3 The crossroad at the junction of Chapel road & the A12 is at best very hazardous. 4) Is the proposed site entrance going to be in Chatten Close if so it will be a nightmare as the road is very narrow and will not be able to accommodate the extra traffic 60 houses would bring.

Attached documents
Mr and Mrs Michael and Alison Hickford

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 28

Comment We live in Eagle Court in Wrentham, right at the bottom adjoining the River Wren which I notice you say 'creates an area at risk of flooding along its length'.

As a result we are naturally concerned about what will happen to the run off water from the new development north and west of Chatten Close which seems to cover a considerably larger area than was originally proposed. When Chatten Close itself was built the developer was required to provide what I think was called a holding pond which was to prevent the run off going straight into the river and making the flooding problems greater. It was a rather grand name for what is little more than a hole in the corner of the field on which it is now proposed to build. As the field slopes down to that corner, and there is nothing to prevent it, soil gets washed into the pond, it gets silted up and clogged with weed. As a result it doesn't hold as much water as it might. Nobody at the council or the Environment Agency or anywhere else seemed to have a clue as to whose responsibility it was to keep it clear and it was only after our previous local councillor, Martin Parsons, made extensive enquiries that we managed to get the silt and weed removed. Whether anybody ever looks at the machinery which is supposed to regulate the discharge I rather doubt. So will run off from the new estate also be directed there? Or will it go direct into the stream which runs alongside the northern edge of the proposed new development and from thence into the main river? Either way it would seem likely to add considerably to the risk of flooding. Given our position that is not a happy thought.

Attached documents
Shelia and David Mitchell

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1504

Comment Re: Proposed development in Wrentham North of Chapel Road

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6. Accepting the needs for more housing, how many of the proposed development will be "affordable"?

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Letter written by Anna and David Mansfield

Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne
Sue Stammers
John Stammers

Attached documents
Sue Stammers

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1510

Comment Re: Proposed development in Wrentham North of Chapel Road

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Letter written by Anna and David Mansfield

Letter signed by Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne

Sue Stammers

John Stammers

Attached documents
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<tr>
<td>Comment ID</td>
<td>1731</td>
</tr>
<tr>
<td>Comment</td>
<td>Provide footway along site frontage</td>
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<td></td>
<td>Transport Statement required</td>
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Attached documents
Suffolk County Council Robert Feakes

Section  
WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  
1690

Comment  
Significant surface water flood risk on northern boundary of site, ordinary watercourse is sensitive and frequently floods

Attached documents
I write to register my concern over the development of 60 dwellings off Chapel Road in Wrentham.

They are as follows.

1. Chapel Road is narrow and is currently difficult to negotiate due to parked vehicles, heavy traffic, the collection and discharge of school buses and a particularly dangerous crossroad at its junction with the A12.

2. It will not help the village in general terms if our children have to go further a field to school or their parents who are responsible for getting them there.

3. 60 houses off Chapel Road and 20 off Bonsey Gardens do not add to the rural feel the village wants to retain.

4. I would hope the access to any development will not be from Chatten Close as the road is too narrow and would be unable to accommodate the increase 60 new dwellings would create.
Victoria John

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 80

Comment I wanted to make a general point about housing development in Wrentham. It is a village with a lot of older residents who would eventually be seeking single story dwellings, possibly with ramp facilities. There are currently quite a few older residents occupying a large property than suits their needs, often living alone. If they wish to remain in the village near to their network of friends and GP, post office and bus service there are limited places to downsize to.

Could new developments take account of the need for more bungalows to meet the needs of existing residents. The larger properties they occupy would then below available for families.

i realise this is looking at the needs of the village rather than the maximum profit a builder could make!

Attached documents
Virginia Goddard

Section  WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID  1507

Comment  
Re: Proposed development in Wrentham North of Chapel Road

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Letter written by Anna and David Mansfield

Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne

Sue Stammers

John Stammers

Attached documents
Yumiko Yates

Section WLP7.9 - Land North of Chapel Road, Wrentham

Comment ID 1506

Comment Re: Proposed development in Wrentham North of Chapel Road

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Letter signed by

Sheila and David Mitchell

Dale Yates

Yumiko Yates

Virginia Goddard

Glynis Etheridge
Claudia Osborne
Sue Stammers
John Stammers

Attached documents
WLP7.10 - Land West of London Road, Wrentham

Andy Warnes

Section

WLP7.10 - Land West of London Road, Wrentham

Comment ID

845

Comment

The land in question has historically been left fallow/set-aside for most of the last 16 years and only recently supposedly used for 'grazing' by about 10 sheep in an attempt to hoodwink the planning process in my opinion. Regardless the unique difference of Wrentham as a Suffolk village is its approach through open fields either by the North or South. To turn any of these approach fields into more non-descript housing blocks ruins its unique nature and turns it into another Kessingland or other overdeveloped village. Moreover the Southern approach through old, in many cases listed buildings, gives Wrentham a particular traditional look and feel which will be greatly diminished if this is cluttered by modern housing in the approach. This particular field will also access/egress onto an awkward dip in the road which is difficult to consider how this will enable safe traffic flow, and i understand there has already been 1 death on this specific stretch of road in recent times due to this lack of visibility and blind spot.

Further and most importantly, there are many brownfield sites in Waveney, some that have been included in development plan proposals that are STILL NOT developed. The council in this plan should NOT earmark or approve for planning ANY greenfield sites ANYWHERE in Waveney until ALL of these brownfield sites have been redeveloped. Lowestoft Town in particular will never prosper until these large areas of part demolished or derelict sites are FULLY redeveloped, in particular the land adjacent to Lake Lothing which is crying out for gentrification to aid new and sustainable growth in Waveney, much like similar areas in Norwich and Ipswich, MUST be fully developed before ANY green field sites are given permission to further develop. Without this simple constraint on local property developers, they will choose to profit from far easier to develop green field sites and Lowestoft will continue to decline.
Attached documents
Benacre Estates Company Edward Vere Nicoll  
Savills (UK) Ltd (Rosanna Metcalfe)

Section  
WLP7.10 - Land West of London Road, Wrentham

Comment ID  1124

Comment  
Policy WLP7.10 of the Plan allocates 1.11 hectares of land at London Road, Wrentham for residential development. The land is entirely in the control of Benacre Estate and we would confirm that this site is deliverable. Appendix 4 of this report includes a plan illustrating the location of the Benacre Company land in terms of this site and the relationship between the site and the existing village. Similar to all its development including the allocated land at Chapel Road in Wrentham, The Benacre Company seek to create an attractive, high quality development on the site which can draw on the rich rural character and heritage of Wrentham.

Policy WLP7.10 sets out a number of specific requirements for the proposal as discussed in turn below. Regarding the site specific criteria in the policy, we acknowledge and support the detailed issues they are seeking to make about the future development of the site. Attached at Appendix 5 to this report is a concept layout plan demonstrating how the residential layout could come forward to deliver the broad aspirations for the site.

Attached at Appendix 6 is a Transport Technical Note. This confirms that vehicular access to the site can be achieved from London Road via a new priority junction. The junction is suitable for the scale of development and visibility splays can be achieved.

Appendix 7 contains an Historic Environment Desk-Based Assessment. This report concludes that the potential development site has a low potential for prehistoric and Roman heritage assets, low to moderate of early to later medieval heritage assets and low to negligible potential for assets of any other period.

The specific criteria with the policy are underlined below and we make some brief comments on each. The site will be developed at a density of approximately 20 dwellings per hectare.
As with the content of Policy WLP7.9, we are unsure how this density figure of 20 dwellings per hectare has been calculated although it may simply be the case that it is a straightforward mathematical figure reached by simple division of total hectares by the 22 dwelling figure to obtain a gross dwelling per hectare figure. This is a different calculation than the figures in policy WLP7.9.

Similar to the view expressed by us in the context of the other Wrentham site, the figure of 22 dwellings in the first sentence of the Policy should be considered as an approximate figure, not an exact one. This is entirely logical since in the circumstances where the site only showed 21 dwellings or indeed 23 dwellings then the Council could say that this is not in line with the Policy. Clearly that is an unsustainable position to adopt and accordingly we suggest that the first sentence of the policy should be re-written to read:

"Land West of London Road, Wrentham (1.11 hectares) as identified on the Policies Map is allocated for residential development of approximately 22 dwellings"

Moreover, the use of the term "appropriate" in this context is consistent with the same term and policy thrust within Policy WLP1.1 which refers to the minimum number of dwellings and the approximate distributions spread across the policy areas in the Plan.

Any proposal should be designed to provide a mix of housing types and sizes. The priority should be for smaller two and three bedroom dwellings.

The enclosed concept plan incorporates this mix which seeks to reflect the character of the surrounding properties.

Properties with frontages onto London Road are to reflect the character of properties within the same frontage located to the east. The frontages of dwellings facing onto London Road at the north east part of the site should be set back from the road in line with the listed building adjacent to the east.

This is noted and the enclosed concept plan acknowledges the existing building line at the frontage to London Road and the setting of the listed building. Dwellings should be of a scale which reflects the scale of semi-detached dwellings located along London Road.

This is noted having regard to the scale of the existing properties and the need to have an appropriate relationship with the new properties coming
forward on the allocated site. Any scheme will be designed to extend and enhance the equipped play space located to the north east of the site, including by the siting of the properties facing onto it.

It is logical to extend the existing play area given its proximity to the allocated area and which provides the ability to have a larger zone for recreation to serve both developments. Existing hedgerows and trees on site and along the boundary should be protected where possible. Quality landscaping and tree planting should be used to screen the development when viewed to the west.

We consider the proposed wording entirely appropriate and support the Council’s aim to preserve the existing views of the village when approaching Wrentham from the south. A condition relating to an archaeological investigation will need to be attached to any planning permission.

The requirement for an archaeological investigation is acknowledged and we consider the Council’s objective to preserve the village’s historic environment is in accordance with Paragraph 132 of the NPPF.

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/134932/PDF/-/8699029%20201%202017%2009%2021%202
Suffolk County Council Robert Feakes

Section WLP7.10 - Land West of London Road, Wrentham

Comment ID 1732

Comment Directly accessed from A12, access design/ road hierarchy to reflect this TS required

Transport Statement required

Attached documents
Therese Coffey

Section WLP7.10 - Land West of London Road, Wrentham

Comment ID 1286

Comment In Wrentham, I would suggest a new access road is needed rather than rely on access from the A12. While this is a 30mph limit, building more homes directly on what is the main road between Ipswich and Lowestoft (and a source of major business growth) could be counterproductive.

Attached documents
Wynn

Section WLP7.10 - Land West of London Road, Wrentham

Comment ID 397

Comment A recent U Gov survey has shown that the need to downsize will continue. Post war baby boomers are having to work longer and will need to release equity to survive. I struggled to find a bungalow in the local area. Some current home owners may well have to move to rented homes. Bungalows, whilst reducing immediate profits for rich builders would save public money in the long term by enabling people to receive care more easily at home and if they were built already adapted or easily adapted to the needs of the elderly or disabled care home places could be reduced.

However words mean nothing. Promises were made to the residents of Wrentham regarding Meadowlands!!

The upshot is we have an ugly, over dense development with insufficient parking which will be inaccessible to the disabled. Sceptical we have a right to be, when at this stage, I can see no mention of the specific needs of some individuals.

This time Waveney must do better as this community has been shafted already and lacks faith in councillors.

This land has only been used for grazing very recently. It was fenced off to stop local people taking a shortcut so the rights of way would be less of an issue. The start of changing the rules?

I am very sceptical when there is so much distance between what you say and what you do.

Attached documents
Small Villages

Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

<table>
<thead>
<tr>
<th>Section</th>
<th>Smaller Villages</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1428</td>
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<tr>
<td>Comment</td>
<td>Figure 25 of page 150 of the consultation document sets out the number of homes allocated to the smaller villages in the draft plan. Willingham village is allocated 40 dwellings in the draft plan and this is supported by the Sotterley Estate.</td>
</tr>
</tbody>
</table>

Attached documents
Brampton with Stoven Strategy and Site Allocations

Section: Brampton with Stoven Strategy and Site Allocations

Comment ID: 595

Comment: Brampton is a small village therefore, the plan says, it would have smaller levels of growth to meet local needs. 65 new homes are proposed (I believe around 6 are already started). Brampton with Stoven have 190 existing houses, 65 new houses are proposed – an increase of 34%! How can that be for local needs? This would lead to approximately 100 new cars...

Attached documents
Brampton with Stoven Parish Council Tracey Burrows

Section  Brampton with Stoven Strategy and Site Allocations

Comment ID  687

Comment  Following recent Parish Council meetings and from our Survey conducted in July 2016, Brampton understands that development is necessary within the district and would like to work with Waveney so that any development within Brampton and Stoven provides best outcomes for all residents.

7.95 Development on Southwold Road

We agree that this should be the priority for any development within the village and this development would assist in community cohesion and the proposed development of a new village hall and play facilities is very exciting. We would urge that the new village hall project should be a stage 1 requirement as part of any development. From our July 2016 Survey, the majority of the residents are excited by the prospect of a new village hall. We trust that the village would retain a large say in its design and we look forward to working with Waveney and Partners in achieving the best possible outcome for the future of the village. There may be also a requirement to discuss design etc with Brampton Primary School so that we achieve the best facilities for them too. The provision of an all weather fenced sports pitch would also provide facilities to the surrounding villages.

7.96

Although a matter for Brampton Primary School and SCC, the Parish would support any expansion to the School. We would also support improvements to the sewerage network, Broadband provision and improved parking at the Station.

Attached documents
Brampton with Stoven Parish Council Tracey Burrows

Section Brampton with Stoven Strategy and Site Allocations

Comment ID 1746

Comment In conclusion, Brampton with Stoven Parish Council have been willing to work with WDC from the very beginning of this Local Plan process so that we can achieve best outcomes for all residents of the village, present and future and we will continue to work with WDC and partners to achieve this.

Attached documents
Les Tarver

**Section** Brampton with Stoven Strategy and Site Allocations

**Comment ID** 787

**Comment**

I am a resident of Brampton and offer comments specifically about the proposals for that village. Brampton and Stoven had a total of 190 dwellings in 2011 and there was little added between then and 2014 - the baseline date for the figures used in the development plan. In the 'Future of our towns, villages and countryside' publication the village is designated a 'smaller village' which should result in 'smaller levels of growth to meet local needs'. I fail to see how an increase of 34% in the number of dwellings, an even higher percentage if you subtract the dwellings in Stoven which is a separate community where no development is planned, fits this criterion. This hardly seems in line with the statement that 'the strategy for the rural areas is to deliver 12% of the district's housing growth.

If Waveney is serious about its green credentials development should surely be targeted on areas with good public transport. Brampton Station is really only a reliable option for the small community around it, being well over a mile from the majority of the village population along a road with dangerous, blind bends and no footpath.

With minimal parking available we cannot guarantee being able to park when attempting to catch the train, a situation which leaves residents necessarily using their cars rather than facing that uncertainty. The bus services are infrequent and often unreliable, resulting in yet more car journeys.

Brampton has few facilities - no shop, post office, public house or doctors' surgery for instance and very few employment opportunities. I cannot understand why such a large increase in dwellings is proposed. 'Local needs' would surely be catered for by a considerably smaller expansion including an affordable housing element.

**Attached documents**
Roy Harris

Section  Brampton with Stoven Strategy and Site Allocations

Comment ID  334

Comment  The land to the east of the station which is owned by the former Lord Prior could support an infill between Station Hill Cottages and the station.

There are other options. As a last resort, I own land which could be used without impact on any of my neighbours, and I also own the land by the station car park which could be made available for a car park extension. However, this would not alter the fact that the local infrastructure will not support further development in this area.

Attached documents
Therese Coffey

Section Brampton with Stoven Strategy and Site Allocations

Comment ID 1285

Comment Of the villages elsewhere in Waveney District Council that is part of the Suffolk Coastal constituency, the stand out surprise for such a large increase in housing is in Brampton. There is a small primary school. There is a small village hall, on the opposite side of the A road to where the houses are proposed. Apart from that, there are no facilities. The main proposed housing location is also nowhere near the railway station; the small housing location proposed is near. As such, I think it is difficult to support this proposal without firmer proposals on improving actual facilities and employment, rather than just a new village hall.

Attached documents
WLP7.11 - Land South of Southwold Road, Brampton

Section  
WLP7.11 - Land South of Southwold Road, Brampton

Comment ID  597

Comment  
I think some new housing opposite Brampton School would be reasonable but surely we have to protect farmland and the wild areas to try to keep pollution to the minimum to help protect our fragile environment.

Attached documents
Brampton with Stoven Parish Council Tracey Burrows

Section WLP7.11 - Land South of Southwold Road, Brampton

Comment ID 688

Comment 7.98

The Parish Council agree that the Southwold Road site provides the best opportunity to provide housing with the village and deliver improved community facilities to existing residents. We urge that we are involved in discussions throughout and that any development is well landscaped and designed in keeping with the rural setting.

7.99 Existing Village Hall

The current village hall built in the early 1950’s is in need of modernisation, heating, insulation, roofing etc. The current layout is unattractive when compared to other facilities nearby. The need of residents to cross the A145 also deters usage. A new village hall/sports pitch and equipped play area closer to the main community and the School, would create a greater focal point for community activities and events.

7.100

The Parish Council would like to retain its high proportion of affordable social rented and affordable to buy dwellings and any new development should reflect this. The provision of single storey and smaller two bedroom housing would allow existing social tenants in larger properties to downscale, releasing larger properties to families, more larger affordable family homes would also allow the younger generations the opportunity to stay within the village rather than being forced into the local towns where properties are cheaper. Hopefully both these will help retain a healthy mix of both young and old within the village.

7.101

The Parish Council sees the provisions of footpaths connecting any new developments to existing developments as a priority. Safe crossing to the school should also be a priority. We would also point out that the footpath
to the church could be improved and better maintained to allow residents and school children safer access to the church.

7.102 Parking Outside the School

Parking at the School has been a problem for decades and the Parish Council has worked very hard at many solutions with little success. The Southwold Road development with the village hall provides possibly our last chance to provide a solution to this issue. At present 34 cars are parked outside on both sides of the road twice a day, this creates problems in terms of safety for children and their parents and for local farm equipment movements and larger vehicles. This is a problem that needs to be resolved whether with the Local Plan or without.

7.103 Open Space

The layout of any housing development and the new village hall etc should be well designed and the community and Parish Council should be involved throughout the planning and development process.

7.104

The design of this new development should be in keeping with the character of a rural village and again the community and Parish Council should be involved throughout the planning and development process. We agree that any planting should be designed to utilise existing hedgerows and trees and support and enhance habitats and biodiversity.

7.107 Site Layout

The Community and Parish Council would like to assist and be involved in the process of creating a final layout for the site that best suits the existing community and provides maximum benefits to Brampton Primary School.

The Parish Council are happy with the proposed development of up to 50 dwellings on the condition that the replacement Village Hall and Open Spaces are provided within the initial phase of development of this site. The approximate housing density of 25 houses per hectare is we feel in keeping with a rural development and that there is a demand for 2 and 3 bedroom dwellings along with some larger family homes within the parish. The Parish Council feel that the housing mix proposed in Policy WLP8.1 would benefit this development.

The revision of a new village hall and associated Open Spaces and Car Parking would benefit both the community and the School, it may be
necessary to increase the car parking from the advised 24 spaces to closer to 40 to satisfy traffic associated with the increased school numbers at the school.

The .8 hectares of open space seems adequate and we would urge any development to include new play equipment for both young and older children. An all weather fenced sports pitch possibly with flood lighting would provide a community asset for both the local residents and the wider community.

The new village hall and play areas should be an integral part of this new development to provide maximum benefit to the new development and to the existing residents.

This development will require improvements to be made to Southwold Road to provide kerbs and improved edging and access with good visibility to any new roads associated with this development.

Some provision could be provided within this development to allow for self build and custom build housing as set out in your Policy WLP8.3.

Attached documents
Historic England

Section WLP7.11 - Land South of Southwold Road, Brampton

Comment ID 1393

Comment This significant rural allocation for up to 50 houses, a replacement village hall, and recreational space is in close proximity to The Old Rectory, grade II to south west. Grade II Brampton Hall, itself a former rectory, and Church of St Peter grade I are further south. There is no reference or consideration to these listed buildings in the supporting text. The Strategic Housing and Economic Land Availability Assessment states there is no historic environment impact, though the supporting text refers to potential for archaeology and there a criteria in the policy for a planning condition relating to archaeological investigation.

Attached documents
J and R Kidner
Durrants (Nick Durrant)

Section
WLP7.11 - Land South of Southwold Road, Brampton

Comment ID
1189

Comment
The Land
Land holding encompassed under policy WLP7.11.

The Proposal
We wish to confirm our support for the allocation of the land owned by Messrs J and R Kidner under policy WLP7.11. We confirm firstly the availability of all the land for development and secondly the commitment to ensure its delivery during the Local Plan period to provide much needed housing stock for the local area.

The landowners accept that Policy Land WLP7.11 will be developed following the principles of the First Draft WDC plan set out on page 155 of that document and the Masterplan para 7.108 figure 21.

The First Draft Local Plan states that more people are moving into the Waveney District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth the demand for housing is growing. The development of the land included within policy WLP7.11 will assist the Council in addressing these issues and meeting the housing need during the Local Plan period and in particular providing shared ownership and starter homes to create a more balanced mix of tenures in the village.

Under the Plan (para 7.99) the Policy intension of the allocation is for the residential development proposed to facilitate the delivery of :-

A new Village Hall

An equipped play area and playing pitch

New car parking which not only serves the village hall and playing spaces
but importantly provides parking during the Brampton Junior School 'pick up and set down' periods on a temporary basis and should alleviate the need for parents to park on the Southwold Road. The latter is used by commercial and large agricultural vehicles and currently severe congestion at the beginning and end of the school day arises. This issue has been the subject of meetings with the landowners, County Council and Waveney District councillors, Chairman of the Parish Council and the school headmistress. There is a meeting of minds that action must be taken.

In one location a community focal point will be created with the above complimentary facilities as the village hub for indoor and outdoor activities.

Development Progress

The Landowners made a submission to WDC under the Call for Sites consultation which closed on 9th January 2016. They now wish to see Policy WLP7.21 proceed in an orderly and structured way.
Stephen Fuller

Section WLP7.11 - Land South of Southwold Road, Brampton

Comment ID 1202

Comment If more houses are required in Brampton then this seems the best place for them to go.

Let's hope that the new village hall will be used more than the current one.
Suffolk County Council Robert Feakes

Section  WLP7.11 - Land South of Southwold Road, Brampton

Comment ID  1733

Comment  Provide footway along site frontage, adequate parking for village hall taking into account school traffic usage

Transport Statement required

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.11 - Land South of Southwold Road, Brampton

Comment ID 718

Comment We consider that the number of dwellings at 50 is disproportionately large in relation to the existing 190. The scale of the development will mean that the landscape impacts will be hard to mitigate.
WLP7.12 Land at Toodley Farm, Station Road, Brampton

Artisan PPS Ltd Leslie Short
Artisan PPS Ltd (Leslie Short)

Section | WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID | 1144

Comment | I act for the freehold owners of the allocated site who are Mr A and Mrs J Samson.

The landowners confirm that the site is fully available for the proposed development and is deliverable in the short term and fully support the allocation of this land.

We consider that the site specific criteria as set out within policy WLP7.12, which in essence form a mini design brief, are unduly restrictive. In the first instance, a more effective use of the available land could easily result in the delivery of 10 dwellings rather than the 8 specified in the draft policy. Restricting the development size to 8 number dwellings is unduly restrictive with a site that is capable of delivering more. There is a planning policy imperative to make the best use of available land and whilst we do not suggest a high-density application, particularly in this rural situation, a development of 10 dwellings on 0.55 ha is a remarkably low density of approximately 18 dwellings/ha. The proposed site allocation could easily accommodate the additional 2 dwellings and we say should accommodate it to make best use of available land.

We produce and attach an indicative layout of one possible scheme for the development of the allocated site which takes account of most of the other development criteria as set out within the policy but demonstrates that the site is capable of delivering a larger number of dwellings (+2) without impacting upon any other significant planning or sustainability issue. We request that the Policy/Allocation be amended accordingly.

Moreover, the indicative layout supplied, demonstrates that the site can
deliver a range of property types which suit the widest age range of potential occupiers and would be a successful blend of 2 and 3 bedroom dwellings of single storey design. Thus, in qualitative terms, they are capable of meeting the objectives of section 6 of the National Planning Policy Framework (delivering a wide choice of housing). The indicative scheme would also deliver dwellings of a type (bungalows which are most in need).

The Planning Practice Guidance

The most recent housing market evidence is contained within an assessment of the Ipswich and Waveney housing market areas carried out for the Council by Peter Brett Associates in May of this year. Within the report (volume 2 section 6) the requirements of specific groups of the population are analysed. It is worthy of note that 29.3% of households in the Waveney HMA were older person only households where the members were 65 years and over. This compares with a regional figure of 22.3% and 20.5% nationally. In some of these households (55.3%) there was only one person which gives an indication of the potential for freeing up under occupied property. In table 6.1 B on page 91 of volume 2 of the PBA housing market area assessment for Waveney, it is noted that the type of accommodation required for older person only households fitted within the following categories – two bedrooms 25.7%, three bedrooms 38.9%. Of the four categories these were easily the two largest figures and have influenced our suggestion as to the composition of the dwelling type within our indicative development layout.

The planning policy imperative (inter alia) to cater for an ageing population is supported by an all party group in Parliament who recognise that 'later homes' are just as important as 'starter homes'. Building homes that are tailor-made for older people – easy to manage with space and light, fully accessible and in the right location, meets the needs of two household types – one older, one younger since the homes often under occupied by older residents can be released for their younger counterparts. A development of the type envisaged in the submitted layout would provide a significant local catalyst in this regard.

Whilst we note the draft Local Plan policy requirement for 4 pairs of semi-detached dwellings, we consider this to be unduly restrictive, not necessarily reflecting need in qualitative terms and in design terms also creates the potential for conflict with those properties on the opposite side of Station Road which will lose their view. It would also create something of a street scene more typical of an urban location (a terraced street) rather
than one which would be more appropriate to this rural setting.

Whilst we acknowledge the existing landscape characteristics of the allocated site and the need to retain wherever possible, the site is not inter-visible with the listed building at Shingle Hall, nor that mentioned in the preliminary assessment at Brampton Old Hall. The proposed development will not suddenly become visible and have the potential to impact on the setting of these listed buildings particularly if the proposed dwellings were to be built to a single storey.

Reference is made in other Waverley Local Plan documents (responses to the local plan consultation and Anglian Water preliminary assessment of sites and their drainage) to the difficulties envisaged in relation to foul sewage infrastructure and the fact that substantial off-site work may be required to enable this development the cost of which 'may make it non-viable'. This is a very restricted view not fully evidenced and based upon a mandatory connection to the public main. For example, the available land within the ownership of my clients abutting the allocated site and its available connection to existing watercourses nearby or in combination with newly created reed beds, make it perfectly possible that a small dedicated bio disc type treatment works, capable of addressing the foul sewage requirements of a development of 10 dwellings could easily be accommodated and would easily be a viable alternative to a mains foul sewer connection. Consequently, foul sewerage availability or the viability of its provision is not an issue for this site.

Similarly, the anticipated requirement for the proposed development to provide a Suds-based surface water drainage strategy can easily be met on the clients other adjacent available land.

We request that these comments are taken into account and the Policy WLP7.12 wording, modified accordingly.

Brampton with Stoven Parish Council Tracey Burrows

Section WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID 689

Comment Amendment to Brampton and Stoven Response to Waveney First Draft Local Plan

7.109 Toodley Farm, Station Road

7.110 At our September Parish Council Meeting some local residents from near the Station raised their concerns about development at Toodley Farm and we would like to amend our response to acknowledge that this resulted in a vote of the Councillors and we would like to object to the proposed development at Toodley Farm.

However, improvements to parking at Brampton would benefit the residents of Brampton and surrounding villages.

7.111 This area of Brampton is very small and any development would need to be sympathetic in character to the surrounding settlement.

There has also been a continuous issue with speed along Station Road, enhanced by the narrow nature of this road and the closeness of properties to the road, any proposals should reflect and assist with the need for speed reduction.

Attached documents
Jill Williams

Section WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID 79

Comment

I live directly opposite the proposed site at Toodley Farm and I firmly object to the site being used for the following reasons:

* It is a small rural hamlet and the beauty of the countryside is in the lack of housing.

* The proposed building plan would greatly reduce the value of my property which I bought for its rural setting.

* Station Road either side of the station is extremely narrow and single track in some places.

* It is a 60mph zone and continuously used by local horse riders. (We already have the problem of Terry Seaman lorries from Redisham regularly using the road and have had a number of near misses.)

* Local people have already had to put up road notices warning people of horses on the road at their own expense.

* Local farmers are continually using the lane for their farm vehicles which have problems passing caused by the narrowness of the road and visitors, delivery vans, etc., having to park on the roadside. Eight houses would create a lot of extra traffic which Station road could not possibly support.

* There is no sewerage service in this area and a lack of good electricity (many power cuts) and poor water pressure.

* There are great-crested newts in our gardens and local farmland which are protected species.

* There is mention in the plans of planting trees to shield the view of Shingle Hall. What about our properties and the blight on our views?????? We are a pair of semi-detached, established houses which were built in 1899. When you look at our lane and the lack of housing, and all the other
places you could choose to build, why right in front of us???

* The distance of these houses, which will probably attract young families are a long distance from the local school which will cause more traffic on the road or the cost to the Council to transport them.

* There are no street lights or pavements in our area and we don’t want any. We have been fighting the rail company for the past year about the light pollution being caused by their station lights being left on all night. Such a waste of energy too. They are about to resolve this problem for us.

* What do you mean about Park and Ride journeys? We already have problems with people from wherever leaving their cars at the station car park or on the road for days on end while they go away! There is very little space for parking and it is free. It is a real nuisance to us locals.

* Toodley Farm is agricultural land. Local builders have tried for years to build/infill in this hamlet without success due to it being tied to agricultural workers. Long may it last!

* Lord Prior has land the other side of the railway to us, and it would infill between Woody Point and the housing hamlet at the bottom of his drive. There is also a pair of semi-detached cottages already along the lane.

* The owners of the field opposite also own land further along our lane nearer to the bend. Why not use that field. It would not offend anyone. It would also link into the small hamlet in Redisham Road part of Brampton by the Barns.

* Why isn’t the south side of Moll’s Lane being considered now? We locals were always under the impression that the plans would incorporate that obvious site. There are already utilities in that lane.

Attached documents
Dashwood

Section WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID 89

Comment Can you tell me were the responses to the survey are for Brampton and Stoven.

There is a proposal for 8 new homes on land at tooley farm in brampton

I live at the old stores next door to toodley farm, and totally object to the proposal

1. There is no infrastructure for new housing eg sewage. Roads are to small electricity and water suppliers none existent.

2. At present there is a 60 mph speed limit going through brampton railway station.

Surely this is more important to get the speed limit down for residents living in brampton let alone building more .

3. Building more houses where are these peoples local hospital doctors etc as they are all being closed.

4. The proposed site is on an agricultural farm were it is agricultural land how come all of a sudden the rules have changed funny how one rule for one and one rule for another.

5. There is not enough room to have 8 houses and for the associated traffic the roads are too small we already have to put up with far to many big lorries cutting through.

6. We moved to be in the country for a rural life not to have a housing estate build next door.

7. Toodley farm has a farm restriction so no residential properties can be built on the land.

8. Is it not the procedure for land owners to come forward with land that they think would be suitable, I have been told that the planning department
approached the farmer, not a good example of sticking to the rules.

9. Why not propose to the farmer that the houses be built down his end of the piece of land and let's see what his response would be, so all the associated traffic, disturbance etc, would be on his door step.

I totally object to this proposal.

Attached documents
Richard Sturman

Section WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID 70

Comment Brampton site allocation toodley farm, my main concern starts with surface water as any water from any rain if sent south down any existing ditch, s would then in turn end in my watercourse which floods now during winter periods due to small victorian culvert under railway line east of my property. As there is no existing surface drains or suitable sewage, next is the 60 m.p.h road to front of new house, s it's fair to say that all existing overhead electricity, b.t. Lines fail to provide for what already there. My property is constantly threatened by regular farm building roof water, and new modern drainage system, s being upgraded every year. I have photos and have made all the railway people aware of this issue for many years. Council and water board have been contacted, so it's up to me make this comment. I and others have tried to get a 30 m.p.h limit but have been told its too expensive! As far as the railway carparking just stop local workers parking and walking to work and its solved.!!! To sum up the ground in Brampton being clay will need a massive undertaking in the right infrastructure put in place first before any building, perhaps something we could all benefit from, I would love proper storm drains, proper sewage, 30 m.p.h speed limit, footpaths, and b.t. Lines.

As a former parish council leader member, and resident since 1994 I think its great for progress exp if you get it right and would not be great for only local young family, s to stay in their parents villages in affordable house, s.

Attached documents
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<thead>
<tr>
<th><strong>Rosemary Short</strong></th>
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<tr>
<td><strong>Section</strong></td>
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<td><strong>Comment ID</strong></td>
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**Attached documents**
Roy Harris

Section  WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID  25

Comment  I have strong objections to this proposed plan first the area will not support development the land considered has an agricultural tie on this there is no mains sewage in the area the electricity supply is already overloaded and water mains pressure is very low . the road itself is narrow and speed limit is 60 mph we have a handicap childrens home by the station more traffic will endanger them when they are walking out with carers the are two large farmers in the vicinity and tractor traffic on the road is very heavy making access on to it from driveways dangerous so more traffic will be even more hazardous .

Attached documents
Roy Harris

Section WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID 83

Comment We strongly object to the planning proposal on the following grounds:

It will ruin the local community who live in this localised area. There are only 5 terrace houses and one pair of semi detached. We all chose this area as it is unspoilt without any amenities.

Toodley Farm has an agricultural tie attached to the house and land and can only be sold to the farming community.

The infrastructure will not support development.

* There is no sewage system in the area.

* The electrical supply is at the end of the distribution network and end user voltage is already low.

* Mains water is at the end of distribution pipework and household pressure is already low.

* The road is narrow and has a 60mph speed limit. There is a handicap children's home adjacent to the station. This road is used by the children and carers. More traffic would increase the danger to them. There is no footpath, nor room to create a footpath. The road is heavily used by two local farmers with large agricultural equipment all year round. The road is also used by the local haulage contractor, Terry Seaman.

* The siting of these houses would disrupt our rural way of life bringing more cars and light pollution to the area.

* The consideration of people using the railway is not a good reason to site houses in this location. The railway car park is small without scope to make larger and is mainly used by commuters who live outside the area who sometimes park for up to two weeks as there is no parking charge. I have right of way over this car park to access my land and there is an on-going
discussion about this problem with the Greater Anglia station manager.

* There are more viable options to place housing in the area. Plot 159 (post consultation note: should read Plot 157) is on a straight section of road. There are no houses in front or behind and the sewage works is close by at the corner of Redisham Road.

* The land to the east of the station which is owned by the former Lord Prior could support an infill between Station Hill Cottages and the station.

* There are other options. As a last resort, I own land which could be used without impact on any of my neighbours, and I also own the land by the station car park which could be made available for a car park extension. However, this would not alter the fact that the local infrastructure will not support further development in this area.

Attached documents
Suffolk County Council Robert Feakes

Section  WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID  1734

Comment  No comments

Attached documents
Suffolk County Council Robert Feakes

Section  
WLP7.12 Land at Toodley Farm, Station Road, Brampton

Comment ID  
1681

Comment  
No viable discharge strategy evident - soil conditions are variable, no watercourses, no AW surface water system.

Attached documents
### Homersfield Strategy

**Environment Agency**

<table>
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<tr>
<th>Section</th>
<th>Homersfield Strategy</th>
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</table>

**Comment ID** 877

**Comment** We support your conclusion that there is little scope for development in regards to Homersfield. The water meadows in which the village is set provide both an important habitat and act as a storage area for flood waters.

**Attached documents**
WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

DR and WE Hayward

Section WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Comment ID 1513

Comment We wish to object to the following planning application. As this would inflict on our privacy not only whilst building but with permanent residence. The reason we bought our property was there are only a few properties around us to be overlooked.

The inconvenience and upheavel this will cause to us will be immense.

There will be extra traffic using the road, the congestion at present with the school close by is at a high already.

The access to the proposed planning is not adequate and will only cause more problems for the residents.

Attached documents
I am enclosing my observations and objections to the above plan in the hope that your council will see sense and reject this un needed scheme. I do this as an immediatly affected member of this community who moved here for a quiet life. This is the last thing I want to see happen.

Reasons To Object.

Firstly i can see no merit or benefit in this ill thought scheme other than to put money into a landowners pocket who appears not to want to work the land for the agricultural use it was intended other than taking a crop of hay.

The public notice has been placed in such a position that no affected parties would see it in the course of their normal day.

Why could you n ot have notiried the persons immediatly affected by this plan instead of them having to rely on the aforementioned obscure notice.

Why must agricultural land be used for domestic developement it is a totally unsuitable use of this land. I am sure there must be plenty of brownfield sites suitable for developement before we start to use agricultural land for building. Not only is it an unsuitable of the land you have included an area of strip backland developement which use to be something that was always a bone of contention in many planning applications.

I consider the impracticalities and faults with this scheme are the following

The access is not shown but looking at the site plan this can only from Hogg lane. This part of Hogg lane is narrow and has a double bend in it. It currently represents a hazard where traffic has to slow or stop to give way to larger vehicles, of which there are many owing to the expansion of two transport yards, down this inadequet country road. Imagine the danger the creation of an additional entrance in this area would cause let alone the introduction of additional traffic. The speed of vehicles approaching the
village from the east can and often is excessive so where is the sense in putting another obstacle in their way.

There is already far more traffic than this country road was designed to take so where is the sense in adding to it.

As you must be aware there is a school in Hogg lane which has a serious traffic and parking problem. Any development in this area can only add to this problem. As we all know traffic and schools do not sit comfortably together.

This proposal will increase the size of the village by over 30% which is unacceptably excessive.

7. 117. With all the recently proposed developments in the primary service area relevant to this application what contingencies are there for increasing the infrastructure i.e. doctors and medical support, schools, roads, retail premises, employment, recreation. At the present time these appear to being reduced not increased.

Where is the queue of people wanting to live in Ilketshall St Lawrence? Who perceives the sense of ribbon development and the need and the need for consolidation and how on earth will this proposal address this perceived problem. At the moment there is more houses on one side of the road than the other but no one is worried about it.

Why does an already well subscribed school need supporting and how can a road system that carries far more traffic than it was designed for be of a benefit.

7. 118. Who pays for the updating of the sewage system and is the cost of doing so viable unless you plan to continue encroaching on to more agricultural land.

7. 119. This statement is totally misleading as it makes no mention of the "Strip backland development" behind the existing properties. Why destroy agricultural land other than for the owners profit. This area seems over the years to be gradually being changed over from agriculture to development land every time an injection of funds is need. Would it have appeared on the additional plan if you had not been approached for a change of use by the owners?

The way you casually mention "the site can be accessed from Hogg lane" leads me to believe that you have no comprehension as to the prevailing traffic circumstances in this particular area. To put an entrance to a housing
development at this point would be nothing short of inviting major problems. The site is in the middle of a double bend where the road narrows and the visibility is limited.

The traffic on Hogg Lane is far in excess of what it was designed for. A high percentage of this traffic is H.G.Vs. caused by the expansion of two transport yards further along the lane, and also a high volume of large agricultural vehicles (natural for a high density agricultural area) which becomes excessive at certain times of the year. The road conditions are such in the area in question that vehicles have to stop in the built up part of Hogg Lane to allow the oncoming vehicles through as the road is not wide enough in the bends to allow two vehicles to pass. You appear to think it is quite in order to introduce an entrance that would be in constant use into this already dangerous situation.

7.120 You may be within walking distance of the school but where will the pavement go and will there be a place at the school when you get there?

Who has this sense of ribbon development.

7.121. If you want to preserve the character and openness and keep the rural setting why change agricultural land to building land Where is the reasonableness and consideration in taking away peoples rural view and giving it to a new development as you would be doing on the backland area of your proposal.

7.122. Has a survey been done in the wider community to ascertain the need of a public play space?

7.123. The development to the west referred to consists of just one bungalow which will have his present rural view completely obscured

7.124. Only until the next time they want change of use. Why do they need to keep the farm access as there will be no farm land in this area adjacent to the road if this plan is agreed. Shurly you are not suggesting we have two entrances on this dangerous section of road.

POLICY

Why has this land been allocated for residential development?

Why reflect the properties on the north of Hogg Lane, surly the ones on the south would be more appropriate or do you consider these are not in keeping with our rural area.
The road as it exists is not adequate for the introduction of a footpath.

Why must the farm access be protected it can easily go elsewhere.

With regards to the landscaping what is proposed for the West and North boundaries.

According to JBA surface water flood map part of this area falls within the significant category for pluvial rainfall.

Attached documents
Michael Neave

Section WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Comment ID 335

Comment

I found out about this proposed development from a neighbour who spotted a sign on a telegraph pole. Why were letters not sent to all the addresses that would be affected?

I bought this home because it is on the edge of the village boundary.

I think my bungalow will be worth less if it is in the middle of a development!

Your proposed development is an outrage.

My next-door and adjacent neighbours have also expressed they may also move.

I always thought that any development plans should be within the village boundaries and I plead with you to reconsider this proposed site and use the alternative site within the village.

I am desperately upset by this proposal.

Attached documents
Mrs Jane and Mr Charles Grand

Section  WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Comment ID  1503

Comment  Having read the proposal to build a minimum of 25 houses but possibly nearly 40, on the above land with the proposed access from Hogg Lane, I would like to strongly raise the following objections:

The proposed access from Hogg Lane will be extremely dangerous as the road narrows here considerably:

* This added to the already high volume of traffic that already uses this road as the main route to Beccles and further afield will increase significant risk of accidents to drivers as well as pedestrians, cyclists and horse riders.

* It will further increase difficulty for the emergency services that often have to use this road at speed.

Being in the midst of agricultural land and open fields the high amount of tractors and other extremely large agricultural vehicles and haulage vehicles (including those from the local companies of Terry Semens and Hinsley both based within approximately one mile) increase the difficulty of using this road with the planned additional access road.

* The current access road for the local school increases risk to the children and parents going to and from school who all apart from a handful all are driven there by their parents or by a large school bus.

* This road is already a pick up and drop off point for high school children who have to assemble here, which also requires a large coach.

* This road is often double parked, often making it extremely difficult for traffic to pass safely through. Sometimes it is impossible for emergency vehicles and tractors with large machinery to get through due to the limited parking at the school especially when there are school events.

* The layby that runs in front of some of the properties in Hogg Lane, is often used as a car park for a whole day or sometimes several days by people taking the bus to Norwich, adding to difficulty of using this road. The
likelihood is that this will increase when used by the new residents and there visitors as additional car parking.

* Additionally all the current residents have experienced frequent problems for years already accessing and exiting our properties. Due to cars being parked either very close to our driveways or sometimes blocking them partially or completely. This considerably limits our visibility in being able to see other vehicles on the road.

* The current speed limit is 30 (although a suggested '20 is Plenty' sign is displayed) and this is rarely adhered to. Many vehicles are driven much faster than this, which again increases the risk of accidents and injury.

* It is stated that existing agricultural land and hedgerows will be protected therefore preventing any safe road alterations to be put in place.

If this development is to be built the access road must be put in from Stone Street which is currently the main road and would be the only safe option.

* The sewage system is already very dated and would require a huge investment to put a new one in place.

* We currently suffer severe flooding in this location and the planned development will add to this.

* The increased risk of Storm Water, Sewage and Drainage problems:

* The existing drainage is very poor and often becomes blocked.

* Currently it would not be able to cope with the planned additional development which could increase the use by a minimum of an additional 100 inhabitants, but possibly many more.

Noise and Light Polution and local Security:

* There is a significant risk with the planned play area which could also attract unwanted anti behaviour social from additional young people who would have somewhere to congregate, as is and has been experienced for many years at the Beccles, Bungay and Halesworth play areas.

* This will highly impact on the current residents who are largely elderly and choose to live here for the quiet rural location.

* The existing rural location will be highly impacted on by the increased level of lights and noise by the increased inhabitants and construction process.
* The planned development of a play area will add to the noise levels and the impact on litter in the area.

* Policing in this rural area is unnoticeable without any local PCSO presence.

Doctors

* The nearest surgery in the catchment area is based at Halesworth, which is 3.5 miles away.

* This surgery is currently working at an extremely high capacity, which to date impacts in not being able to obtain a Drs appointment before 4 weeks if needed. This would only become worse.

The Local Primary School

* Has poor pedestrian access via the footpaths

* Have limited capacity due to the SORN that changed the local education system to a two tier system in Suffolk 6 years ago.

We have additional concerns:

* That there has not been any prior awareness raised about this proposed development and that it is planned to be built on 'Greenbelt Land'.

* This land has agricultural status so I find it disturbing that the lawful 'Change of Use' for a residential development seems to be either totally overlooked by the council or will be quickly changed in order to accommodate these plans. Therefore is this going to set a precedent for the other farmers who own agricultural fields completely encompassing our properties?

* Is this something on going that we are seeing currently in the other local villages eg Rumburgh and Westhall as well as in Ilketshall St Lawrence?

We need to be heard, listened to and not overlooked in these proposed plans and any further consultations.

Attached documents
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<tr>
<td>Comment ID</td>
<td>1634</td>
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<tr>
<td>Comment</td>
<td>WLP7.13 (page 160). Ilketshall St Lawrence. Section 7.123 and the policy refers to the field pattern, but the Suffolk Historic Landscape Characterisation shows that the development site represents pre-18th century enclosure. The retention of boundary features is important, as identified in the draft, but in addition the layout should if possible retain wholly or partially historic features inside the site in the design of the scheme. We would suggest an amendment to the supporting text and policy.</td>
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<td>Attached documents</td>
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</table>
Suffolk County Council Robert Feakes

Section WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Comment ID 1735

Comment Provide footway along site frontage linking to existing. Extend 30 mph speed limit

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Comment ID 720

Comment We consider that the number of dwellings at 25 is disproportionately large in relation to the existing 79. The scale of the development will mean that the landscape impacts will be hard to mitigate.

Attached documents
Lound Strategy and Site Allocations

Lound Parish Council John Burford

<table>
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<tr>
<th>Section</th>
<th>Lound Strategy and Site Allocations</th>
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<tr>
<td>Comment ID</td>
<td>951</td>
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<tr>
<td>Comment</td>
<td>The house designs should sympathetic to the Lound village, smart and affordable. Parking is a concern on The Street in Lound and will be made worse with additional properties.</td>
</tr>
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Attached documents
Pearce

Section: Lound Strategy and Site Allocations

Comment ID: 683

Comment: I am writing to submit my complete objection to the proposed development in Lound (WLP7.14).

The reasons for my objection are as follows:

- Firstly the area available for your suggested development is incorrect. You are suggesting building on land that I now own and will under no circumstances be offering for development of any kind.

- My family moved into our home last year so that we have complete privacy in our garden for our 3 children. By building 10 houses surrounding our garden you are robbing us of our privacy and peace.

- Our house is over 200 years old, therefore has very low ceiling and windows upstairs and down. Building a modern sized house over looking our property will allow a direct view into all of our bedrooms, living room and kitchen, again seriously impacting our privacy.

- The plan would significantly devalue our property and is highly likely to land my family into financial difficulty.

- There will be an increased amount of noise and disturbance to this quiet village, as well have a negative visual impact.

- Development will be detrimental to the wildlife commonly found in the area.

- Traffic access and parking is already serious issue, and this plan will add to that problem. Flooding during moderate rain is an issue on connecting roads in and out of the village and access for emergency services can be an issue during busy periods. The roads aren't suitable for additional traffic.

- There are no facilities here for more families such as schools, GPS, not even a local shop.
In my opinion there are many other more appropriate sites that could be developed without having such a massive direct impact of peoples lives in such a negative way.

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Lound Strategy and Site Allocations

Comment ID 1009

Comment 5.1 The Somerleyton Estate broadly support the draft local plan and in particular the proposed 'rural strategy' which has sought to address the acknowledged historic lack of development in rural areas such as Somerleyton and Lound.

Lound

5.2 The Somerleyton Estate have been disappointed to see that the site sustainability assessments undertaken as part of the options assessment process in Lound display clear inconsistencies between the sites submitted at the call for sites stage and afterwards.

5.3 It is acknowledged that this can be due to different members of planning staff undertaking the assessments however these inconsistencies have led to the wrong outcome for Lound.

5.4 The Somerleyton Estate have requested the inconsistencies be corrected and that their site north of Snakes Lane be allocated for housing development alongside or in place of the draft allocation site.

Attached documents
WLP7.14 - Land East of The Street, Lound

Historic England

Section WLP7.14 - Land East of The Street, Lound

Comment ID 1394

Comment Site WLP7.14 has been identified for 10 dwellings next to the grade II* Church of St John the Baptist. Whilst the site potentially has the capacity for some development, consideration needs to be given to appropriate quantum and layout, given the surrounding development in Lound. The policy includes detailed wording which implies a specific layout for the 10 dwellings which is not set out in the local plan. Whilst we welcome the policy requiring a heritage assessment as part of an application which will identify any mitigation measures, if the indicative layout and, therefore, quantum are incorrect at this stage it leaves fewer options for mitigation at planning stage. We would recommend further work on this policy.

Attached documents
<table>
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<th>Jason Pearce</th>
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<th>Section</th>
<th>WLP7.14 - Land East of The Street, Lound</th>
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<th>Comment ID</th>
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<tr>
<th>Comment</th>
<th>Dear Sir/Madam</th>
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<td></td>
<td>During the last published application in spring last year we were not residents in the area and unaware of this proposal. We now live adjacent to the proposed development site and I write in connection with this consultation application. I have examined the plans and I know the site well, the proposed boundary line area is now part of land I now own therefor I wish to object strongly to the plans of building new houses to the land in question. My reason to the objection are loss of light or overshadowing in my garden, loss of privacy and will certainly impact on the peaceful enjoyment of our home and garden, highway safety and traffic generation, noise and disturbance, landscaping to the area.</td>
</tr>
<tr>
<td>Kind regards</td>
<td>Jason Pearce</td>
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</table>

| Attached documents |
Judith Hobbs

Section WLP7.14 - Land East of The Street, Lound

Comment ID 396

Comment WLP7.14 Land east of The Street, Lound

I agree that a row of houses facing The Village Green, would form a natural edge to the core of the village, and would hide to a degree the two big detached houses built to the north of the site, which really do not fit the overall character of the place. I would not object to the projected building on this land PROVIDED:

1. The houses are small and affordable, and REMAIN affordable. Often, once sold on, such properties cease to be affordable. Certain conditions should apply on a permanent basis, such as, 'first-time buyers only' or an upper age qualification - 'buyers to be age 55 and over', or leasehold or shared ownership to maintain some control.

2. That mature trees and hedges should be protected; perhaps even added to and improved by proper maintenance.

3. That hard surfaces should as far as possible be gravelled, not concreted or brick-weaved, in order not to reduce what is already very low rainfall supply to surrounding tree and plant life.

4. That the view across to the church from The Street should not in any way be restricted or spoilt.

5. That there should be no building adjacent to, overlooking or otherwise impinging on the back boundary of Nether End Cottage, which abuts the extreme north-eastern boundary of the site.

Judith Hobbs

Attached documents
kevin morgan

Section  
WLP7.14 - Land East of The Street, Lound

Comment ID  
435

Comment  
I think a lot of residents feel that the village should stay as it is .. a quiet and friendly place and great place to live, having lived on an estate with idiots for neighbours I know the value of village life and want to see this preserved.

Even 10 new houses on the site proposed will change the character of the village, it will impact on the ever increasing traffic flow add further noise and light pollution to the main part of the village.

It will also potentially create further parking problems for existing residence in the street (most people tend to have more than one car and could lead to limited parking spaces being available )

The café has brought a lot more visitors to Lound and in turn parking problems, the proposed entrance to the site is in place where a lot of cars park up on both sides of the road particularly if there is no spaces in the main part of the street, this has caused a bottle neck, making it difficult for vehicles to negotiate and in particular large vehicles such as lorries and farming machinery.

Also as mentioned by others, any new development will increase the traffic flow since there is no employment or amenities other than the pub and café people will have to travel out, it's a regular occurrence for cars to cut through the village at speed ( well over 30) and we have had one incident since I have been here with one of the residents being hit by a car.

To introduce more houses more cars with no amenities to the village which has old / bad drainage systems seems inappropriate and will cause major disruption and a negative impact on the tranquility of the village.
Louis Smith

Section WLP7.14 - Land East of The Street, Lound

Comment ID 952

Comment I consider that this is a suitable site for small-scale housing development in Lound. Any houses here need to be small, similar in size to the houses further north along The Street.

As this site is elevated from the road, new houses should not be tall. A house built about 15 years ago at 40 The Street is taller than others nearby and is obtrusive.

I note the northern boundary of this site is right up against the house at 40 The Street. Some green space should be left between any new houses and the existing house at 40 The Street.

Access to this site from The Street is on a curve in the road. The entrance onto The Street will need to be carefully designed and kept clear of parked vehicles.

Attached is a picture of the 6 houses built about 20 years ago at The Green, around 150m north of this site. These fit the existing character of the village, and something similar for this new site would be suitable.

Perhaps the developing Neighbourhood Plan should include a design brief for this site.

Moira Selvage

Section WLP7.14 - Land East of The Street, Lound

Comment ID 568

Comment In response to the 1st Draft July 2017 I query how Policy WLP7.14 was NEVER stated in the original Waveney Local Plan. Site 75 and Site 167 was earmarked, so individually and as a village at a meeting we responded. In August 2017 in the Waveney First Draft Local Plan sent to all households I learnt and discovered surprisingly that this new Policy WLP7.14 was included for 10 dwellings unbeknown to us villages in Lound. This was not stated before - a very sneaky move indeed!

Please consider my comments:

1) Parking on The Street, Lound

   a) 10 dwellings on a plot of 45 hectares will incur added congestion to an already dangerous fast moving traffic on the narrow street. Yes these dwellings will have their own parking but practically, households these days and the years to come (2036??) may have more than 1 car; garages are sometimes not used; people will visit; all these factors mean a steady stream of traffic emerging on The Street Lound.

   b) The present parking situation on The Street is overloaded with The Mardle Cafe parking is crowded, cars still SPEED through the village. Do come after 6pm when householders have returned from work and monitor the situation. From nos 1-39 especially along The Street cards are parked. This is just opposite the proposed WLP7.14 for 10 dwellings.

   c) Opposite this proposed site WLP7.14 are 2 driveways at no 45 and no 39. Cars park to the left and right of my driveway and even opposite making coming out of my driveway onto The Street difficult. With 10 dwellings build across, it will become more hazardous with the added vehicles.

   d) There is another driveway on The Street serving 2 houses and their cars coming out onto The Street as well. This is just next to the 10 proposed dwellings - say no more!
e) As we have no gas in the village, our houses along The Street depend on oil deliveries. Do come and monitor the situation when one of these tankers deliver the oil! All traffic stops and sadly drivers waiting for a free passage along The Street are not patient or courteous in behaviour... Danger ahead.

May I suggest therefore instead of 10 dwellings being considered on a .45 hectare piece of land (a real travesty of rural beauty in a unique village) that a parking area for cars has priority in this narrow The Street Lound.

Hoping my views have been relevance to this new Waveney Local Plan. I also hope this hand written letter is read and not discarded because it is not typed out!

I look forward to hearing that my comments have been received.

Attached documents
Mr & Mrs S A James

Section  
WLP7.14 - Land East of The Street, Lound

Comment ID  
634

Comment  
With reference to our submitted site now referred to as policy WLP7-14, Last East of The Street Lound.

The drawing now published adjacent to the site difference to the site drawing as submitted to you by us.

The first difference affects the boundary between 40 The Street and the proposed sites North Boundary. On our drawing this was drawn as a straight line being further away from our dwelling, on your drawing it is now slightly bent and comes right up to our house as now built.

The second affects the back East boundary of no 42 as drawn on your drawing the boundary line seems to have been slightly too far to the West and encroaches the garden of no 42 now not owned by us.

The area we suggested was 0.4 hectares you have listed it as 0.45 hectares.

We are aware there are no exact dimensions given on the various documents and at this stage it may not be necessary to details these, however would you please confirm to us whether you need to act on the information we have now provided.

Attached documents  
http://consult.waveney.gov.uk/gf2.ti/af/799778/135011/PDF-/8678069%201%202017%2009%2025%20Mr%20%20Mrs%20S%20A%20James%20site%20planpdf.pdf
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section WLP7.14 - Land East of The Street, Lound

Comment ID 1001

Comment Lound Strategy and Site Allocation Draft Policy WLP7.14

3.25 The draft local plan proposes to allocate a single site in Lound, covered by draft policy WLP7.14.

3.26 The Somerleyton Estate object to the strategy for Lound because of a number of inconsistencies in the site sustainability appraisals which have led to Site 75 not being allocated in preference to the draft allocation site.

3.27 At the call for sites stage the Somerleyton Estate submitted a site option in Lound referred to as Site 75 'Land North of Snakes Lane'.

3.28 Later on at the Issues and Options stage another site option 194 (now referred to as WLP7.14) was submitted by a third party and was assessed inconsistently with the sites options submitted for Lound at the earlier stage.

3.29 If these inconsistencies are corrected (as set out below) then Site 75 performs better than the WLP7.14 site and importantly on two of the most important SA objectives for rural villages; access to services and facilities and historic environment:

The table in Appendix 1 summarises the current site sustainability appraisal scores for both sites, explains the inconsistencies and suggests the corrected scores for Site 75 and WLP7.14 as shown in the summary table above.

3.31 As an example of one of the inconsistencies the Environment Agency mapping in Appendix 2 shows that no surface water flooding issues exist on Site 75 showing that the site assessment undertaken for Site 75 against Objective 10 was wrong and should now be corrected.

3.32 The Somerleyton Estate request that the site sustainability appraisals
are corrected and that as a minimum Site 75 is included as a proposed residential allocations alongside WLP7.14 or in place of it.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135318/PDF/-/8694165%20201%202017%202009%202021%20Somerleyton%20Estatepdf.pdf
**Suffolk County Council Robert Feakes**

**Section**  
WLP7.14 - Land East of The Street, Lound

**Comment ID**  
1635

**Comment**  
• WLP7.14 (page 163) – SCCAS has not previously commented on this allocation. Upfront assessment as set out would inform developer risk, although managing archaeological work by condition is likely to be acceptable and policy and text could be amended accordingly.

**Attached documents**
Suffolk County Council Robert Feakes

Section  WLP7.14 - Land East of The Street, Lound

Comment ID  1736

Comment  Locate access away from slight bend to achieve visibility splays

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.14 - Land East of The Street, Lound

Comment ID 721

Comment We object to the proposed development of this site which is important to the wider setting of St Johns Church and views into and out of the church environs.

Attached documents
Mutford Strategy and Site Allocations

Helen Ward

Section Mutford Strategy and Site Allocations

Comment ID 27

Comment Is there any possibility of further development in Holly Lane for 1 or 2 dwellings.

Attached documents
Paul Tavener

Section  Mutford Strategy and Site Allocations

Comment ID  127

Comment  Mutford is a small village and added housing will destroy the area with more traffic, more noise.
Sandra Knights

Section Mutford Strategy and Site Allocations

Comment ID 1042

Comment WLP7.16 and WLP7.15

both of these sites are taking prime agricultural land on farms which are owned by Suffolk County Council. CPRE state that small rented farms are disappearing all over the country. It is hard enough for young people who attend agricultural college to get into farming if they do not have connections to family farms. There are many fields right in the centre of Mutford village that are prime for development and are not used for agriculture. I am sure people owning these fields would only be too pleased to sell their land for houses. This road is very narrow, also on a bend and is the busiest road in the village. If houses were built on these sites you are talking of 20 or more cars coming in and out and the road which would be very dangerous and hazardous.

Also the WLP7.15 site is not on any sewer system and is very prawn to flooding.

Attached documents
WLP7.15 - Land South of Chapel Road, Mutford

Adam Hillier

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 11

Comment

My property is the last one on the row and is surrounded on the east and south border by the proposed site. I strongly object to this field being developed. When my wife and I purchased our house the house itself was in poor condition, but we absolutely fell in love with the surroundings, the setting and the views and most importantly the fact that we had 270 degrees without neighbours. We have since renovated our house to be our dream home. If you were to build houses on this site it would at a guess easily knock at least £200,000 off the value, not to mention destroy the beautiful and peaceful setting both ourselves and our neighbours who gardens also back onto this site enjoy.

There is no good reason other than greed for developing that site. The houses built will not fall into the affordable homes category as Mutford is a desirable place to live and values are higher than that of affordable homes. If the homes are built to a low spec in order to make them affordable then you devalue Mutford as a whole.

I sincerely hope this site is removed from the development plan and I intend to object at every opportunity to any planned development. I notice there is another site highlighted for development in Mutford that would have very little effect on existing homes as it is not located directly bordering any properties. That site is much more suitable!

Attached documents
Anna Lincoln

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 411

Comment Planning: Mutford Development Plans

I write in connection with the above planning consultation. I have examined the plans and I object strongly to the proposed development of houses in this village.

As you’ve noted in your planning proposal Mutford is a small settlement and infilling could ruin the character of the village while estate development would clearly overwhelm it.

I have detailed below the many reasons why I consider the development to be poorly sited, including contradictions in your general housing policy:

* Inadequate transportation infrastructure for the elderly, children and commuters.

* There is inadequate road infrastructure (i.e small country lanes) in the area. The increased volume of cars as a result of this development will elevate the current issues of traffic and on road parking which creates safety concerns. The roads were not designed for this level of traffic with may blind spots and areas not wide enough for two way traffic.

* The siting of the development will have a significant impact on the current road structure, especially being sited on the main t junction area which is narrow and cramped. Many agricultural vehicles pass through this road and junction on a daily basis with the existing Farm located on Chapel Road. Increasing traffic flow and property entrance/exit onto this junction is of significant safety concern.

* Potential housing is located away from employment zones which encourages more car useage (for those that can afford it as there is no alternative option).

* The type of development proposed within the village is not in keeping with the character of the existing plots. As referenced in your planning
document the majority of these are two storey dwellings and single storey bungalows with good sized plots relative to the footprint size of the buildings. The current suggested planned volume of housing will not be in keeping with this considering the size of the plots suggested.

* The proposed development will change the "look and feel" of the village to something more in keeping with larger villages such as Carlton Colville which has better infrastructure to support such developments. Existing residents have located themselves in Mutford to gain the open space and small village feel which would be taken away as a result of this development.

* Adjacent existing plots to the proposed developments, particularly plot WLP7.16, will be significantly impacted by the proposed developments. New housing would be in direct line of sight of what is currently an open expanse of fields. Any new development would be largely objected and compensation would be expected.

* There are no local schools.

* There is no local shop.

* Poor coverage for care for children and the elderly. Resources, where available, are already stretched in this area.

* The actual construction of the development would be severely disruptive and the current road infrastructure would not be sufficient to sustain the level of commercial vehicles required for such a development. This again raises serious safety concerns.

The village itself does not have basic safety such as;

* Full pavements in the location of the potential housing

* Street lighting

* Traffic calming

* Site WLP7.16 is located at the main village juncture which is already a potential safety concern.

There is no evidence how the proposed developments will help "support local services and facilities" as there is currently none in place.

There are no guarantees increased development will improve facilities such as telecommunications. It is very doubtful that mobile phone companies
will be encouraged with improving coverage in the area due to the low population density even after the proposed development. There are also government targets for rural broadband so new housing is not relevant and will not increase the likelihood of improved communications. It should therefore not be included within your planning document as a benefit, as this is pure speculation.

Regeneration of Lowestoft is rightly a priority and focus should be improving the town and building on Brown field sites within that area. A better Lowestoft will encourage more wealth generating households into the area which has the knock on impact increasing jobs etc. This should rightly be your focus.

I strongly advise that you obtain and take into consideration the views of the local population on this subject.

I look forward to hearing your response.

Attached documents
Anthea Pitchers

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 656

Comment

I think the proposed site for development is in a fairly good position in regard to the other houses in Mutford however I would be concerned about the number of houses proposed on this field, three or four would be more in keeping with the village rather than the eight proposed and give the properties a reasonable garden area.

My second concern is regarding the access from Chapel road, the entire field is located on a very long sweeping blind bend. This part of the road is already a dangerous area. At first sight it appears to be a reasonably wide road then suddenly narrows as it enters the village. It would be bad enough to have access for one home let alone several.

I believe developing individual homes in different areas would be preferable to being built altogether in one place. Mutford is a very beautiful rural village we do not want to see it becoming so big that it ends up joining up with Carlton Colville.

Attached documents
Anthea Pitchers

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 657

Comment This site appears to be more suitable for development however again too many houses have been proposed. Three or four homes with good sized gardens would be much better than trying to cram more in the area.

I am concerned that if too many homes are built at the same time, the total increase in the numbers of the village occupants will be overwhelming and course too bigger change in its character.

We must protect our small villages if they become too large then they inevitably get absorbed into surrounding developments and become part of a town.

Attached documents
Caroline Gregory

Section  
WLP7.15 - Land South of Chapel Road, Mutford

Comment ID  
184

Comment  
THE NUMBER OF PROPERTIES SHOULD BE REDUCED

Attached documents
David Hurren

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 853

Comment The description for this area already outlines the several significant problems associated with developing this area like: impact on an Area of Outstanding Natural Beauty, regular flooding of the field throughout the year, no sewerage infrastructure, restriction on the size of properties to mitigate for St Andrews Church etc. There are however some other issues that are of equal serious concern as follows.

1. The whole area of Mutford is in a low area and subject to flooding. Indeed at the other end of the village (Mill Road) a water pump operates to help remove excess water and Holly Land regularly floods. The field proposed for this development is, and has been for centuries, the escape for water from high ground to the north, east and south down to the Hundred Rivers. In the last 3 years the local farmers have introduce drainage into these areas and the flow of water from these fields is now far more significant. In addition the properties in the immediate area all have private sewerage systems and require good drainage to facilitate this. Building on this field would seriously affect the ability to handle the high levels of water to be drained away from the village

2. The site is located on the busy exit from the village leading to Lowestoft, Kessingland, Ipswich and the A12 main route. Furthermore throughout the year heavy agricultural equipment pass through this area, and people use this route as a shortcut to and from the A12 to Beccles and Norwich. This exit is also on a dangerous bend, and having the traffic associated with several more properties on that bend, entering and exiting their homes, would generate potential for accidents for everyone using or travelling in this area.

3. Viewed as a whole the site has very little to recommend it, as it is currently outside the confines of the village and has so many restrictions and problems. This is particularly notable as there are several better alternative sites within the confines of the Village, and not within the Area
of Outstanding Natural Beauty. (Please see comment for WP7.16).

Attached documents
Mutford Parish Council John Armstrong

Section  WLP7.15 - Land South of Chapel Road, Mutford

Comment ID  908

Comment  At its last meeting, the Council discussed the first draft of the Local Development Plan and in particular WLP 7.15 Land South of Chapel Road Mutford and WLP 7.16 Land North of Chapel Road Mutford.

The Council has no objection to either of the proposed sites but wishes to ensure that there is sufficient off road parking for each of the proposed dwellings commensurate with the number of driving aged occupants in each household and the likely number of motor vehicles per households in a rural location is higher than in an urban environment (an absolute minimum of 2/3 spaces per dwelling). The Council notes that there is a recommendation for off road parking in WLP 7.15 but not in WLP 7.16. The Council would expect the provision of off road parking to be included in the specification for both sites. The road network in the village is mainly narrow roads and issues relating to on road parking has caused a number of problems for the Council. Their view is that, notwithstanding the creation of suitable designed dwellings that do not detract from the current village housing stock and the requirements of the AONB, provision of adequate off road parking is critical and must be provided.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section  
WLP7.15 - Land South of Chapel Road, Mutford

Comment ID  
811

Comment  
7.140 - amend to read that the site is within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty.

8 dwellings would not be considered to be major development, however, it remains important to take full account of the nationally designated landscape within which the site is located.

Policy WLP7.15 - A Landscape and Visual Impact Assessment will be required to inform likely impacts on the landscape character and special qualities of the AONB. This should inform an appropriate landscape scheme which delivers required mitigation as well as providing enhancement to local landscape character and AONB.

Design should take account of local character, materials etc. combined with sustainable building principles.

Attached documents
Suffolk County Council (Corporate Land) Simon Cartmell

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 583

Comment Suffolk County Council as land owner, supports WLP7.15. The site is subject to an agricultural tenancy, but vacant possession can be obtained following the grant of planning permission for an alternative use.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 1636

Comment • WLP7.15 (page 165) SCCAS has not previously commented on this allocation. Upfront assessment as set out would inform developer risk, although managing archaeological work by condition may be acceptable and policy and text could be amended accordingly.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.15 - Land South of Chapel Road, Mutford

Comment ID 1661

Comment A large part of this site is constrained by surface water flood risk. The District Council has recognised the risk in the policy and the supporting text, and the small allocation (relative to the size of the site) may recognise this issue.

As fewer than ten dwellings are proposed, applications to implement this allocation would not ordinarily be considered by the County Council as LLFA [Lead Local Flood Authority]. But given the constraints on the site, the District may wish to consider requiring that the County Council is consulted on the drainage strategy for this site.

Attached documents
**Suffolk County Council Robert Feakes**

<table>
<thead>
<tr>
<th>Section</th>
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<tr>
<td>Comment ID</td>
<td>1737</td>
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<tr>
<td>Comment</td>
<td>Located on bend so visibility splay will require large amount of cleared land. Possible 30 mph speed limit extension.</td>
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</tbody>
</table>

**Attached documents**
Suffolk Preservation Society Fiona Cairns

Section  
WLP7.15 - Land South of Chapel Road, Mutford

Comment ID  
722

Comment  
We recommend that the policy includes reference to the site being wholly within the AONB and is cross referenced to policy WLP8.33 Landscape Character to recognise the sensitivity of the site.

Attached documents
WLP7.16 - Land North of Chapel Road, Mutford

Anna Lincoln

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 412

Comment Planning: Mutford Development Plans

I write in connection with the above planning consultation. I have examined the plans and I object strongly to the proposed development of houses in this village.

As you've noted in your planning proposal Mutford is a small settlement and infilling could ruin the character of the village while estate development would clearly overwhelm it.

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I strongly advise that you obtain and take into consideration the views of the local population on this subject.

I look forward to hearing your response.

**Attached documents**
David Hurren

Section  WLP7.16 - Land North of Chapel Road, Mutford

Comment ID  230

Comment  WP7.16 Land North of Chapel Road, Mutford

The land to the north of Chapel Road is a good location for adding developments, however the particular site selected has some issues that have not been mentioned in the plan as follows:

* The area immediately in front the site WP7.16 is a very congested area in the village as it has some of the oldest properties located there. This includes the original Blacksmiths building and the original Holly Farmhouse. This means that the road is very narrow and there is a sharp bend just prior to the location coming from the east, and there is limited off road parking for existing residents.

* Due to the age and history associated with this area, with the original Holly Farmhouse, Blacksmiths Shop and the old Chapel location, it would be sad if this area was change by adding a new development.

* There is an alternative site readily available on the same field. By moving the development further west along Chapel road towards Mutford Church and utilise the same field to the north of the road, but between the Mill Road Junction and the property called Church View, all of these issues could be avoided. This offers the following:

  * There is ample room for a development that could contain all the properties allocated for Mutford in the WLP (WLP&.15 and WP&.16).

  * This location is outside the Area of Outstanding Natural Beauty and therefore there would be fewer restrictions on the size and type of property (see comments on the Vision for WLP).

  * Chapel Road in this area links to the main sewer in the village and, as the field is on higher ground, there will be no drainage problems.

  * There is open ground to the front and rear of this location and therefore offers the opportunity to develop a very sympathetic location that fits the
rural area and is in keeping with the current style and layout of Mutford.

* Chapel Road, in this area, is straight and is the least used within Mutford. It therefore offers much safer access onto Chapel Road than at any other point.

* With appropriate landscaping this location has the potential to provide habitats for the wildlife and provide a stepping stone between Mutford Big Wood to the other woods and wildlife sites in the area. Neither of the other sites would do that.

* With good site planning and landscaping, any impact on the area could be completely minimise and, the location would be one of the better areas to live in the village, enhancing the health and enjoyment of those who live there.

* Because the location is within the confines of the village, the occupants would feel part of the village and be more incline to use the Village Hall close by, and not feel like outcasts on the edge of the village confines.

**Attached documents**
Dianne Shepherd

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 579

Comment

Why was the original site changed to Chapel Road? We already have major parking problems at the north end of Mill Road, with the cars from the two new properties, 1 and 1a Mill Road. They, and their numerous visitors, are constantly parking opposite our driveway, although they have their own parking areas behind their houses. It is quite a dangerous situation. As we try to back out of our driveway, cars are on our side of the road overtaking all the parked ones, and very few people observe the 30mph speed limit. Some years ago this was raised with Suffolk County Council who put down some yellow lines, but they are not long enough. Yet more houses are going to exacerbate this problem, as people will look for other options when their own area is full of cars, it is only human nature. Also during construction, where are all of their vehicles going to be parked? The LANEs in this area cannot take any more traffic. I have a very comprehensive CD showing the parking situation over quite a long period of time, and you are very welcome to a copy.

I notice on your draft plan you mention "Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts" Surely you should also be evaluating the impact of this development, and also the other one in Mutford, on the residents of the village. Also, have you considered the large numbers of sparrows who use that hedgerow for nesting.

When my husband and I moved here 30 years ago it was idyllic, but as always things change, but not always for the better. How many young people are there in the village who need homes? It is more likely to be outsiders. When you have built the initial phase what is to stop you building further into the area? The narrow roads are busy enough now, together with the large tractors hurtling through here without any regard, breaking down verges. Most people totally ignore the 30mph speed limit. As a village
we do not have any more capacity.

Attached documents
Mutford Parish Council John Armstrong

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 909

Comment At its last meeting, the Council discussed the first draft of the Local Development Plan and in particular WLP 7.15 Land South of Chapel Road Mutford and WLP 7.16 Land North of Chapel Road Mutford.

The Council has no objection to either of the proposed sites but wishes to ensure that there is sufficient off road parking for each of the proposed dwellings commensurate with the number of driving aged occupants in each household and the likely number of motor vehicles per households in a rural location is higher than in an urban environment (an absolute minimum of 2/3 spaces per dwelling). The Council notes that there is a recommendation for off road parking in WLP 7.15 but not in WLP 7.16. The Council would expect the provision of off road parking to be included in the specification for both sites. The road network in the village is mainly narrow roads and issues relating to on road parking has caused a number of problems for the Council. Their view is that, notwithstanding the creation of suitable designed dwellings that do not detract from the current village housing stock and the requirements of the AONB, provision of adequate off road parking is critical and must be provided.

Attached documents
Paul Tavener

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 128

Comment This is too much housing for the village which will introduce more traffic and noise. The access to the village is not suitable for more traffic. You are also using good land far more useful growing crops or for grazing livestock.

Attached documents
<table>
<thead>
<tr>
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Suffolk County Council Robert Feakes

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 1682

Comment Infiltration should be confirmed on site, looks to be the only viable drainage strategy

Attached documents
Suffolk County Council Robert Feakes

Section  
WLP7.16 - Land North of Chapel Road, Mutford

Comment ID  
1738

Comment  
No comments

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.16 - Land North of Chapel Road, Mutford

Comment ID 723

Comment We recommend that the policy includes reference to the site being adjacent to, and therefore affecting the setting of, the AONB and is cross referenced to policy WLP8.33 Landscape Character to recognise the sensitivity of the site.
Ringsfield Strategy and Site Allocations

Brian Smith

Section  Ringsfield Strategy and Site Allocations

Comment ID  228

Comment  Our village school [Ringsfield] will not be able to cope with an influx of minors.

Ringsfield Road and Church Rd is already a race track. 60 MPH for a country lane. It should be 30 MPH from Bungay Road to village.

We do believe in progress as long as all the other needs are thoroughly looked into.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section Ringsfield Strategy and Site Allocations

Comment ID 1114

Comment Ringsfield and Weston are rural communities which are fortunate to have a school, a Church and a pub. Residents in Ringsfield and Weston have lived there all their lives or have moved to the locality specifically for its ruralness.

There has been a suggestion of allowing some in-fill outside the village envelope along Cromwell Road. There would have to be some improvement to pedestrian access along Cromwell Road.

Ringsfield and Weston are rural communities wishing to maintain their rural identity. The residents appreciate there should be some development within the area but not the density proposed at site WLP7.17 on School Road.

Attached documents
WLP7.17 - Land North of School Road, Ringsfield

Alan Wheeler

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 84

Comment The proposed allocation of space for housing in Ringsfield is totally out of keeping with the village and rural nature of the area. The increased traffic accessing School Road will increase the danger on an already dangerous road. This part of the village has little in the way of basic infrastructure. The sewer system does not reach all the properties in this part of the village and water pressure has long been a problem. The bus service is limited and unreliable and the village hall and surrounding facilities in a poor state needing serious investment. Not all of the services are accessible by pavement. Detailed comments on each of the planning statements are below:

7.151 School Road is a narrow and poor quality road suffering greatly from the current road traffic and already a bottle neck due to school parking. It is only a matter of time before there is a serious accident at this site. An access road from the proposed development will only make this matter worse. The current 30 mph speed limit, it’s also a 20’s plenty area’ is poorly observed which will mean that traffic turning out of the development into what is effectively a single lane road will be hazardous.

7.1.52 There is little demand in the community for new housing while I accept that some new houses are probably required a development of 40 is total out of proportion to the village size. Ringsfield currently has about 120 houses and so a 30% increase is unnecessary and unwanted. The houses are spread out along a series of roads and not concentrated in a small area such as you are now proposing. The types of houses being purposed are completely different to those in the road, you are purposing terrace, semi and detached houses, currently nearly all of them are bungalow.

Properties next to the site have had planning applications refused as they wanted to install dormer windows and you insisted on velux ones instead. You are now proposing two story buildings, so it appears there is one rule
for home owners and another for planners. The site is on the crest of the hill and so these higher buildings will be even more obvious and intrusive in what is predominately a rural landscape.

The current area is rural. A housing estate has a severe impact on the nature of the area and is a major change to the village, shifting the focus away from the village green, where the limited facilities are offered, to one on the edge of the village.

School road is used as a cut through between London Road and the A144 Bungay Halesworth road. In places this road is single lane with blind corners. It is heavily used at times of the year by large farm vehicles. The new relief road is likely to increase traffic using School Road as vehicles leaving the relief road will cut through to Bungay and then onwards to Flixtom, Homersfield, Harleston and Diss. Addition traffic from the proposed site will only make the safety and traffic situation worse.

The regular bus service is in fact 4 buses each way each day. There have been problems with service not starting early enough for people attending the local medical centre and people have been stranded in Beccles unable to return to Ringsfield due to the last bus being cancelled. The current series does not support people working normal working hours (9 to 5) and certainly not any shift or weekend working.

The village hall is in need of refurbishment and the play area isn't fit for purpose. To reach the public house it is necessary to walk in the road. The school having recently been expanded is causing serious issues at the start and the end of the school day, only minimised by the generosity of a local farmer allowing people to park on his land. Some houses in School Road already have their access drives blocked for periods of the day. Any further expansion will cause serious issues along the road.

There are few jobs in Ringsfield and services such as medical services, transport and shops are all in Beccles some 2 to 3 miles away or Bungay 4 to 5 miles away. To access these, new residents will require cars and this will lead to increased traffic around the area and in School Road, Church Road and Cromwell Road particularly. These roads are already limited to single lane working in places and dangerous.

7.153 The adjacent residential area housing density is more like 7 houses per hectare than the 15 you quote. School Road only has 41 houses in a 5 hectare area. You are proposing 40 houses in a 2.5 hectare area.

7.154 Why if the proposed houses are outside of the existing facility
catchment area do you not insist on facilities being provided.

7.155 The northern boundary is private land and there is no right of way. How can you say that an opportunity exists for a footpath to the village hall.

7.156 Here you say the site is exposed and that the development could be prominent and exposed and adversely affecting the rural surroundings, this is not in keeping with your earlier comments about the the potential having an adverse impact is low. A tree and hedge planting scheme in order to be effective would take up some of the land and further concentrate the housing increasing the packing density well above the surrounding area.

Attached documents
Anonymous

Section: WLP7.17 - Land North of School Road, Ringsfield

Comment ID: 210

Comment:
[Ringsfield] An additional 50+ houses will bring pressure to existing doctors, dentists, small but excellent hospital, roads – speed limit needs to be 30!
The area is rural and needs to be 'expanded' sympathetically.

Attached documents
Anonymous

Section  
WLP7.17 - Land North of School Road, Ringsfield

Comment ID  
209

Comment  
Re Ringsfield, 40 new homes problems are the drs, schools cannot cope at this time without adding. Ringsfield Roads are getting very busy with a unlimited speed. These are most peoples concerns.

Attached documents
Brian Leggett

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 12

Comment At the moment there is utter chaos outside the school at school start and finish times. It is obvious to me that this chaos would be made considerably worse by this development. It is, in my opinion, only a matter of time before someone is hurt along the "school stretch". The verges are chewed up by existing farm traffic and HGVs due to the "school run" parking.

A further 40 properties accessing School Road, opposite the School itself, is an obvious recipe for disaster!

However, a way out of this would be the building of a new road of suitable size running northwards and then eastwards along the boundary of the Ringsfield playing field. The exit point would then be away from a very congested area with excellent visibility. The existing 30 mph zone might need to be extended to cover this exit.

Finally we will shortly have the southern relief road built and I am sure that this will increase the flow of cars and HGVs along School Road as they make their way to the Bungay Halesworth road.

Attached documents
Christine Wheeler

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 892

Comment With reference to the proposed new build in School Road Ringsfield. The proposal is for there to be forty new homes placed on a site opposite to the school. Whilst I do not consider it inappropriate for there to be new housing in Ringsfield, as there is a need for local people, and especially the young to be able to live in their home village, I do think the scale of the development is inappropriate.

My reasons are as follows:

The site is immediately opposite the school. School Road is a very busy road at certain times of the time, especially when children are being taken to school. But also at harvest time when the road is filled with large farm equipment and lorries, transporting grain to and from the silos, less than 100 metres for the proposed site. Having potentially, another eighty cars joining this traffic will be an enormous hazard, not only to the school, but to the new pedestrians who will be living the proposed houses.

The proposal is for houses. There are only six houses in School Road, counting from the crossroads to the perimeter of the village. The rest of the accommodation being bungalows. Ironically, the property neighbouring the proposed site, was not granted planning permission to put dormer windows into its renovation a few years ago, as it would change the visual impact of the surrounding area. It would therefore be more appropriate that any new build should be of low rise, if Waveney District Council's past view is to be taken into account.

There is also considerable run off of water from the surrounding fields, causing Church Road to flood. With more building at the top of the hill, this will increase this occurrence. Drainage has always been an issue at the school end of the road, and we have, since we have lived in our current house, always had to ensure that we kept our ditch well maintained to ensure that any residue did not cause Andaman to our property. Indeed, when first moving to the property twenty years ago, we went to
considerable expense to put in sufficient drainage to stop any potential flooding. Similarly our neighbouring farm has also put in a considerable amount of new drainage to stop flooding on the silo site.

This end of the village is on a blue clay belt, hence the need to consider the nature of the soil to be built upon.

Generally I think it is quite naïve to think that Beccles with its current infrastructure will be able to cope with the amount of new building which is proposed.

Currently the coverage from the Suffolk Constabulary is totally insufficient for Beccles and its surrounding villages. A sergeant and two PCOs to police such a vast area is a nonsensical. This small workforce will not cope with the increase in population.

Our local medical surgery – one of the best in the area, has already changed its way of working to cope with the increasing demand. When I asked at the Consultation Meeting how more infrastructure was to be achieved for the increased population, I was told that the Council had spoken to the CCG and they were working to achieve more doctors etc. The Beccles Practice, one of the best in the county cannot recruit doctors now, so how is it they will be able to recruit once Beccles is larger, and probably less attractive to new General Practitioners. In fact, I would suggest that it may even decrease, and we have less of a service than we have now.

Education: Similar to health, where are the teachers to come from. The John Lemon School, a good school is I believe at capacity. Is there a new Senior School planned and where is it to be built.

Lastly, what is to become of the nature of Beccles and its surrounding villages. We are a rural community, we do not wish to become a conurbation of Lowestoft with all its inherent problems.

Gillian Brett

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 650

Comment Although I appreciate the need for housing, I have some major concerns, especially around the issues of density, safety, drainage/sewerage. They are as follows:-

- **Density** - I feel strongly that the density of the proposed development is too high. The proposed density of 15 houses per hectare, (which although lower than built up areas), does not reflect the current density of our rural village, which I calculate to be 12.5 (for the area of Ringsfield corner, School Road, Redisham Road, Church Road and Cromwell Road). The figure for School Road itself is even less, at approximately 10 per hectare.

- **Character of the Village** - The Development Plan, (The Plan), paragraph 7.149, refers to the development reflecting the character of the area. However, the main characteristic of the layout of Ringsfield's housing is the linear layout of the properties along the roads and few, if any, houses in Ringsfield overlook their neighbours. The houses in the development however will be clustered within a square, which is out of character with the rest of the village. A development of 40 houses would increase the number of homes in this area of the village by 50%, in my opinion, an overwhelming number.

- **Housing Mix** - about 38% of the 81 properties in the core of the village are bungalows. The majority of properties in School Road itself are bungalows. Many of the residents live in large bungalows when a smaller bungalow may suit them better. The housing mix in the proposed development does not include bungalows which is a missed opportunity. Smaller bungalows on the site would not only provide opportunities for older people to move from larger properties, (suitable for families), but would also provide suitable accommodation for disabled people.

- **Safety** - the entrance to the site is right opposite the school and it is highly likely that 80 cars, (possibly more), could be using the exit onto School Road. This figure is not unrealistic as public transport is poor in Ringsfield. In
the plan Ringfield is described as having a regular bus service. Regular it may be, but there are only 4 buses per day the timings do not fit with commuting to work, therefore the working families that this development would hope to attract, will need their own cars. This extra traffic raises the issues of safe access to a narrow lane opposite a school.

During drop off/pick-up times School road, and the loop off School Road, is clogged with parked cars, with parents and children walking along narrow pavements. Vehicles coming/going from the development would have to drive through this congestion. A proper, permanent solution to the school parking problem would need to be addressed, particularly as the school will need to expand. To compound this problem the new southern relief road will increase traffic through Ringsfield, including School Road.

• Drainage - the field earmarked for development is heavy clay and often has standing water on it in winter. Housing developments increase run off speed and I am concerned that an increased amount of water may lead to local flooding.

• Sewerage - the main sewer runs down the centre of School Road towards the crossroads. Halfway along it joins a sewer coming from the direction of the crossroads then tees off southwards down the fields. This system may be required to take 100% more waste. There have been a number of issues with blocked sewers in Ringsfield and this is ongoing. It is simply not good enough to say the developers will have to sort it, as no one seems to have been able to sort the ongoing problem in Beccles centre (where the smell of sewage still permeates the area outside Boots Chemist). To summarise, the following issues need to be considered and addressed:-

• There should be a reduction in the number of houses to, at least, reflect the nature (type), and density of the houses in the core of the village. Some bungalows on the side of the development adjoining School Road would, I think, soften its impact considerably.

• The developers should be compelled to allocate a parking area for the School within the area of the land earmarked for development.

• Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered
developments, are more in keeping with the area.

• Any size of development on the Ringsfield site must pay special attention to drainage and capacity of the sewers.

• The developers must be held accountable for screening and landscaping. Front and rear gardens in Ringsfield are large and this should be reflected in the development. I wish to make it clear that I do not completely oppose development on this site, only the scale of it and the resulting safety and drainage issues. There is an opportunity here to develop an attractive site that could further enhance Ringsfield as a place to live. I accept that the owners of the land will want to sell it for the best price, and any developer will want to maximize profit. However, it is the current residents of the village that will have to live with the negative effects of so many extra houses in one place, should the proposal go ahead without due regard to the concerns raised.

Attached documents
Graham Gander

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 917

Comment Following our attendance at the meeting in Beccles Public Hall on Tuesday 8th August 2017, and a subsequent telephone discussion with Dan Hubbard, I feel compelled to write to you to express our views about the plan. I would like to think that you will incorporate these views as the Final Draft Plan is composed.

We have issues with the draft plan both in terms of the impact on Ringsfield, where we live, and also the wider impact on the community at Beccles. Can we say upfront that we completely recognise the need for development and future housing but our issues are with your choice of location and the impact on the community, for which you seem to have no plan or answers in many instances. It was clear from my conversation with Mr Hubbard that some aspects of the plan were under the control of Central Government, so I will be copying in a copy of this letter to Mr Peter Aldous MP, for his comments.

The Impact on Ringsfield.

This is essentially twofold:-

1) You have already approved a development for 10 new holiday homes in the village and your proposal in the Local Plan is for a further 44 new homes, making an increase of 54 in total. Ringsfield currently has 139 residences; so you are proposing an increase of 39%, which is far above the proposed increase for the whole area, and meaning that Ringsfield is shouldering an unfair proportion of the increase and it is unacceptable. It will change the character of the village forever. We choose to live in a rural area for exactly that reason, it is rural and you are proposing to develop the village beyond what is acceptable for a rural location. I acknowledge that there is a preference for development in villages that have amenities such as schools, but this is not the answer; urban areas have schools also and the residents have chosen to live in an urban area. I also acknowledge that the 10 holiday homes do not place the same burden on the local infrastructure
as permanent residences, but in terms of the likes of traffic, potential crime, issues with parking, they do, and this in turn impacts on the existing residents.

2) Traffic is the second concern. 50 extra residences will probably each have 2 vehicles and each of these will probably do at least 2 journeys a day, meaning an increase of 100 plus journeys a day. We currently have extreme issues with speeding past our house and this development will only exacerbate the issue. Suffolk County Council are reluctant to increase scope of the village speed limit because there is 'not enough evidence of accidents to justify it', a ridiculous approach! The traffic problem is worsened further since the development of the bio-digester at Ellough, when we now have heavy tractor/trailers going past our house at frequent intervals, from dawn to dusk during the summer months. This has also lead to damage to the road which is dangerous and simply has not been repaired. The effect of this is that we are virtually cut off from the village, ½ mile away, as it is no longer safe to walk along the road. Any future development should come with a guarantee that these problems will be addressed.

In the absence of any real assurances for how the infrastructure is going to be maintained, we do not feel that we can support the proposals in general at this time and certainly not in the context of the development at Ringsfield.

Attached documents
Jeremy Garrod

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 828

Comment
I would like to express my views regarding the proposed Waveney First Draft Local Plan.

My comments are in relation to the planned development of 40 new houses in School Road, Ringsfield. As a resident of School Road, my family and I have serious concerns about the proposed site.

First, parking is already a major problem in School Road (see picture). The parents of Ringsfield Primary School park all the way along School Road, the Service Road and at the farm past the school. Since Ringsfield became a Middle School, increased pupil numbers has resulted in a rise in on street parking. There have been several instances where parents have parked on my driveway and those of my neighbours. If the development gets the go-ahead, the increase in traffic will make parking even more problematic. Also, it is potentially dangerous as it’s within close proximity to the school.

Second, the rural roads are not designed for heavy construction traffic. There is already damage to the road (including potholes). This is likely to worsen with increased traffic.

Third, noise pollution (the development is adjacent to my family’s back garden) will have a direct impact on my family’s everyday quality of life.

Fourth, we are likely to see a rise in levels of pollution from construction traffic, possibly putting children's health at risk. The proposed site is directly opposite the school playground. Noise pollution and pollution from higher levels of nitrogen oxide may impact children's health.

Lastly, I do hope that Waveney District Council considers my views as set out above. Building 40 new dwellings directly opposite Ringsfield Primary School not only has a negative impact on our quality of life, but will also lead to an increase in the volume of traffic and pollution. Parking is already a problem during school drop-off and pick-up times. Above all, construction traffic only metres from the school raises serious health and safety
concerns given that the school playground is only metres from the proposed development. This could have a detrimental effect on children’s health. For these reasons, my family and I are strongly against this proposed development.

**Attached documents**  
http://consult.waveney.gov.uk/gf2.ti/af/799778/134788/PNG/-/8687093%201%20plan2PNG.PNG
John and Gillian Farrell

Section  WLP7.17 - Land North of School Road, Ringsfield

Comment ID  323

Comment  

e: Proposed development at Ringsfield

You have invited responses regarding the proposed development of the above village. As residents of Ringsfield, may we make the following observations.

1) The scale of development suggest is far too large for a village of Ringsfield’s size.

2) The school cannot cope with the present intake of children, including the near impossible traffic congestion caused by parents delivering and collecting children.

3) The present road situation is totally unsuitable for increased congestion, especially in view of large agricultural vehicles, many travelling to Ellough along small and narrow country roads.

4) Our village is devoid of amenities with the exception of a public house and village hall - facilities only used by those with a use for these facilities, rather than shops or safe footpaths through the village needed by many!

5) To suggest that the village can cope with, manage, or welcome, a development of the size suggested is, in our view, misguided, and needs to be viewed again with a proposal that a smaller development, incorporating a variety of housing needs, should be provided.

Attached documents
I'm contacting you with regards to the proposed Waveney First Draft Local Plan.

On pages 168-170 there is a planned development of 40 new houses in School Road, Ringsfield. My parents live in School Road and I am a former resident and regular visitor to my parent's home. We all have serious concerns in relation to this proposed site. These concerns can be summarised as follows:

- Noise pollution (the development is adjacent to my family's back garden), impacting everyday quality of life
- Increased levels of nitrogen oxide from traffic putting children at risk
- Safety issues given the increased traffic
- Increased levels of parking which is already a significant problem along School Road
- Potential damage to roads in and out of the village.

The attached photographs were taken at 8:30am on a school day. You can see how the traffic is already built up along School Road. This includes cars parked opposite the school playground which is only metres from the proposed location for the 40 new dwellings. In addition, there is already spill over from school parking on the nearby farm.

Clearly, if this development gets the go ahead there will be construction traffic within only a few metres of the school playground. This raises health and safety concerns, in particular the danger from traffic and higher nitrogen oxide levels. The latter was recently highlighted at a national level as a major problem outside schools due to traffic/parking. See link to Guardian article in April this year - https://www.theguardian.com/environment/2017/apr/04/thousands-of-
british-children-exposed-to-illegal-levels-of-air-pollution

Finally, I hope that Waveney District Council takes into consideration the number of serious issues associated with this proposed development. Parking is already a significant problem and the increased traffic from construction, followed by new residents, will only worsen the issue. Above all, construction traffic will be only metres from the school playground raising serious health and safety concerns. For these reasons, I am strongly against this proposed development.

Attached documents  
http://consult.waveney.gov.uk/gf2.ti/af/799778/134728/PNG/-/8685557%201%20plan1PNG.PNG
Margaret Sayer

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 742

Comment I am very concerned regarding the proposal to build 40 homes in our small rural village. With the holiday lodges (10 + 1 managers flat) that would add 51 properties. I don't know the exact no of properties in the village but this proposal must add up to almost a 50% increase. The thought of having 100+ vehicles extra in the village is just unacceptable. You will find that almost every home has 2 or 3 cars as transport links are very poor. To walk beyond the crossroads towards the pub and beyond is to risk life and limb. You have to be nimble enough to jump up onto the grass verge. Very few cars observe the 30 mile per hr speed limit. Try walking with a pram or child! especially on the bends.

It is a nightmare when children are being taken and collected from school. Most are from outside the village so again a car is necessary. It is worse in the afternoon when all the parents arrive together and line up their cars starting at 2.30pm. They park outside our drive and park right up to the junctions – we have our vision obscured and have had a few near misses. The parents are disrespectful and just don’t care. Another 40 homes with parents rushing home to pick their children up will just add to the problem. I believe the school does not have the capacity to take more children so would have to increase in size.

This development will stick out like a sore thumb with the extra cars, noise and lights. We see all sorts of wildlife – birds, stoats, weasels, barn owl, marsh-harrier – I could go on. John John’s wood is really not a suitable place at all.

Local people are also very concerned that the new by-pass could be a double edged-sword as people from Bungay could use School Road as a cut through to the bypass to travel to Lowestoft and avoid the traffic build up in Beccles which seems to get busier. This with a new housing estate is a double whammy.

You will also have heard the worry regarding GP surgery. I can see them
handing the keys back as the numbers to care for and GP shortages grow.

If this field is too difficult to farm might I suggest an alternative use ie work with Suffolk Wildlife to turn it into a wildflower meadow and allow the primary school to use as a field study. This would truly benefit the village and future generations.

To sum up:

This housing estate + holiday lodges is a clear and unsustainable over-development of this small rural village. The minor roads already require repair due to the agricultural vehicles and the extra traffic will not help. I am very worried about the safety of pedestrians and horse and riders.

The school does not have the capacity to take extra children.

This will adversely affect the way of life in our small village.

I believe that housing is proposed off London Road, wouldn't it be better to build adjacent to A roads rather than bringing traffic along minor roads.

Attached documents
I would like to make the following comments about the above proposed development.

1) I would like to question the accuracy of the 15 houses per hectare figure used to calculate the number of houses in this development. The majority of houses in Ringsfield (actually Ringsfield Corner) are strung out along the roads from the crossroads of School road, Cromwell road and Redisham/Church road. It is these houses, especially those along School road will be most affected by any development. Using the facilities available with Google Earth to work out the area taken up by these 81 properties gives a figure around 12.5 houses/hectare. This would immediately reduce the number of houses on the development to 32, not the proposed 40.

2) In the development plan paragraph 7.149, reference is made to the development reflecting the character of the area. The outstanding character of Ringsfield is the 'strung out', linear layout of the houses along the roads. Few, if any, houses in Ringsfield overlook their neighbours. The houses in the development however will be clustered within a square, and could appear as a 'tacked on estate'.

3) Something in the region of 38% of the 81 properties in the core of the village are bungalows. In School road itself the majority are bungalows. The housing mix in the proposed development does not include bungalows.

4) A development of 40 houses effectively increases the number of houses in the core of the village by 50%. In my opinion this overwhelms the village.

5) 40 properties are likely generate up to 80 cars (possibly more). This figure is not unrealistic as public transport is not a option from Ringsfield. In the plan Ringfield is described as having a regular bus service. Regular it may be, but there are only 4 buses per day and at times that means the bus is not a practical commuting option. The working families, that this development would hope to attract, will need their own cars. This extra
traffic raises the issues of safe access to a narrow lane opposite a school.

6) Safety. The entrance to the site is right opposite the school. During school drop and off/pick-up times School road, and the loop off School road, is clogged with parked cars with parents and children walking along narrow pavements. Vehicles coming/going from the development would have to drive through this congestion. A proper, permanent solution to the school parking problem would need to be addressed, particularly as the school will need to expand. To compound this problem the new Beccles southern relief road will increase traffic through Ringsfield, including School road.

7) Drainage. The field earmarked for development is, like much of the land here heavy clay and often has standing water on it in winter. Housing developments increase run off speed and I am concerned that an increased amount of water may lead to local flooding.

8) Sewerage. The main sewer runs down the centre of School road towards the crossroads. Halfway along it joins a sewer coming from the direction of the crossroads then tees off southwards down the fields. This system may be required to take 100% more waste. There have been a number of issues with blocked sewers in Ringsfield.

I wish to make it clear that I do not completely oppose development on this site, only the scale of it. There is an opportunity here to develop an attractive site that could further enhance Ringsfield as a place to live. I accept that the owners of the land wish it sold for the best price, any developer will want to maximize profit, and Waveney District Council need to find space for housing. However, it is the current residents of the village that will have to live with, what I feel, will be the negative effects of so many extra houses in one place.

I would like to see seriously considered and addressed the following:

A) A reduction in the number of houses to, at least, reflect the nature (type), and density of the houses in the core of the village. A few bungalows on the south (School rd) side of the development would, I think, soften its impact considerably.

B) That the developers are compelled to allocate a parking area for the School within the area of the land earmarked for development.

C) Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else).
areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

D) Any size of development on the Ringsfield site must pay special attention to drainage and capacity of the sewers.

E) That the developers must be held to the plans' proposals for screening and landscaping. Front and rear gardens in Ringsfield are large and this should be reflected in the development. Unfortunately developers are likely to resist such space hungry proposals as bungalows and large gardens.

Attached documents
Mark Timm

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 727

Comment As land owners, we write in connection with the land at Ringsfield. Further to the draft plan recently publicised, we would support development of the site.

We agree with the benefits reported in the draft plan. Including the creation of jobs, supporting the existing services and facilities in the village, and helping meet local housing needs. The site is well connected and the potential for development to have an adverse impact on the landscape is low.

Our family has a long standing link with the village, as the land has been passed down generations of our family local to Ringsfield. Therefore we will ensure any development is in the interests of the village and its people.

We note the school is likely to require expansion for 10 places and play areas would require improvements. If the development was to go ahead we would like to make a donation to assist with this.

Should you have any queries regarding this matter then please do not hesitate to contact us.

Attached documents
Neil Read

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 1215

Comment Hi, i have had a look at the First draft plan for the land North of School Rd Ringsfield. I totally understand the need for more housing in the area, but where the first draft plan for Ringsfield is, i don’t think its suitable land to build 40 dwellings on, as where the access for the proposed site would be opposite the front of the school, where the road does narrow and with lorries and farm vehicles coming through, this causes problems now as teachers and parents have to park from the front of the school back to the crossroads. Speaking to villagers who’s children go to the school, they are all saying the school is at its capacity, when parents are collecting there children they are having to park on the farm yard which to me could be a serious health and safety issue for the school and the farm. I think there is land which is more suitable to build on in the village, looking at the village map there is land on Cromwell Rd, Church Rd and Redisham Rd which would give better access in and out to the properties. The other way to solve the access would be to bring a access road in from the North of the village hall this way, also if this were to go ahead it would have to be looked at what size properties were to be built on the land, as joining the land all properties are bungalows, so if there were houses built on the land the bungalows would be overlooked.

Many thanks

Neil Read

Attached documents
Richard Sayer

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 615

Comment Dear Sir/Madam,

Re: Ringsfield Ref WLP7.17 - 40 Proposed New Homes.

My name is Richard Sayer and I am writing to object to the proposed plans to develop site ref WLP7.17 IN Ringsfield off School Road.

I was born in Barsham in 1950 and have lived and worked in the Waveney Valley all my life. I have seen many sustainable changes and developments in that time. This proposal in neither sensible or sustainable in a small agricultural village. It is a gross overdevelopment in an environmentally sensitive area, the proposed site runs the whole length of John John's wood which is home to green woodpeckers, spotted woodpeckers and little owls that occasionally visit our garden and use our shed roof as a vantage point at dusk.

The traffic chaos that ensues every school run morning and afternoon has caused my wife and I to have several near misses when trying to pull our into School Road with vehicles obscuring the view. The idea of adding another 80 + vehicles daily is preposterous.

It is all well and good for the landowners and developers to plunder rich pickings from building sites but it is all the existing residents that have to bear the burden of their ill conceived greed. The increased noise light pollution and traffic problems would be unacceptable to both residents and wildlife.

Yes, we are all N.i.M.B.Y'S but landowners and developers are all N.I.T.B.Y.'S because they have made sure this is Not IN Their Back Yard !!.

Please bear in mind that planning permission has been granted for 10 Holiday Lodges (which do not look like lodges as they are built from brick and block) + Manager's flat. This will probably mean an increase if traffic for 9 months of the year +. Our small roads cannot cope with this amount of
traffic as they regularly break up now due to the amount of agricultural vehicles.

Local services are i.e. G.P.’s are struggling to cope now without all the additional families this and other proposed schemes will be the final straw for our local services.

Yours faithfully,

Richard Sayer.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 1115

Comment There has been most regale against the suggestion of the preferred site of development on School Road of potentially 40 houses. Whilst most residents agree there has to be a degree of development in the Village, 40 houses against the backdrop of the sparseness of the Village is considered too many and suggest a smaller development towards the front of the plot. The reasons behind this are:

* School Road is approximately 1.5 car width with no room for expansion. It is busy during school times with extensive parking causing the width of the road to be further reduced.

* Services are working at optimum currently. Foul water drainage and water pressure being problematic.

* 40 additional houses will bring an increased number of cars to the village with increased road usage along School Road and the other main routes in to and out of the Village.

* With the additional vehicles turning across from the School, this poses additional risks to those children going to school particularly as pavements are of poor structure and narrow.

* The school and potential entrance to the proposed development site are just within a 30mph speed limit, however many vehicles entering the area have not reduced speed to within 30mph when abreast with the school, thus increasing safety in that immediate vicinity.

* There is currently a minimal bus service serving Ringsfield. It currently does not operate such that people can get to Beccles or Halesworth before 9am and therefore does not serve the working population.

* Surface water drainage. The land floods in winter and excess surface water heads across the field behind the proposed site down in to the valley by the Church. This creates a flooding challenge and is a problem now
before the surface is further excluded by housing development.

* The neighbouring John John’s Wood has been a key part of the village for many years and it was felt the 40-house development would have a negative impact on such an old wood.

* Where would the additional residents work? There has not been any increase in rural employment opportunities.

The development has been suggested in Ringsfield as population figures have shown a decrease in the number of residents in the village over the last 10 years or so. It is accepted by the residents that this is a generational flux and that some of a proposed development should be houses suitable for downsizing of the older residents who do not want to leave the Village thus allowing families to move in to vacated larger properties.

The presence of the school and its survival over the coming years has also been implicated for the 40-house development. However the school is full this academic year and with an excellent Ofsted inspection report, is attracting many applications from outside the catchment area and introducing a degree of diversity in to the pupil population. However there is some resentment from some local parents.

Ringsfield and Weston are rural communities wishing to maintain their rural identity. The residents appreciate there should be some development within the area but not the density proposed at site WLP7.17 on School Road.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 1683

Comment
No viable discharge strategy evident - soil conditions are variable, no watercourses, no AW surface water system.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 1739

Comment Provide footway along site frontage with crossing point to school

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.17 - Land North of School Road, Ringsfield

Comment ID 724

Comment We consider that the number of dwellings at 40 is disproportionately large in relation to the existing 137. The scale of the development will mean that the landscape impacts will be hard to mitigate. The settlement has a linear form and we consider that the site could accommodate a much reduced size of development that follows this established morphology.

Attached documents
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WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Connie Spall
Tim Basey-Fisher

Section WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID 1234

Comment The proposed allocation of land adjacent Mill Bungalow, Rumburgh is supported. The land is suitable and available for development and can be released for development immediately (subject to obtaining planning consent).

7.159 & Figure 32

This policy states an area of 1.4 hectares which is highlighted in Fig 32.

Required changes:

The eastern half of the southern boundary should be moved further south to take in derelict property and garden for redevelopment.

7.161

This Policy states that this site (1.4 hectare) should have a similar density to the adjacent residential area of 10 dwellings per hectare however Policy WLP7.18 allocates 12 dwellings which is less than 9 dwellings per hectare.

Required Changes:

Amend Policy WLP7.18 to show an allocation of 14 dwellings which equates to a housing density of 10 dwellings per hectare.

Attached documents
Environment Agency

Section  WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID  878

Comment  We welcome the desire to protect existing hedgerows and trees in any new development as well as additional planting where possible, this will contribute to green infrastructure of the area.

Attached documents
Janet Holden

Section WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID 13

Comment The strategy claims that building houses in Rumburgh will ensure the success of the public house. Is this based on evidence? I very much doubt that the building of 12 dwellings will have an impact on the pubs longevity. There are no real facilities in the village other than a playing field and village hall. Creeping suburbanisation with box like houses like the ones on the opposite sire of the grassed area is not what this village needs. Access to schools will be problematic and the development will add more traffic to minor roads. This village needs social housing. Where is this mentioned in the strategy?

Attached documents
Mr Peter Hughes

Section WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID 124

Comment Thank you for inviting comments on the strategic site allocation for Rumburgh although I must say I am not in favour of this proposal. I have prepared the attached statement which sets out my views on the site at the junction of Mill Road and the Street. Doubtless there will be other development sites brought forward in the review process but I don’t see how you can overcome the sustainability criteria in this rural vicinity.

I have been invited to comment on the latest review of the Waveney Local Plan and on the proposals for development in Rumburgh on site WLP7.18.

When I moved here in 1996 the Draft Local Plan identified a field at the corner of Mill Road/The Street for amenity space as the Planners said that the village lacked a "centre". The site also included at the suggestion of the Planners a new house in each corner of the field. This proposal had no commercial support and was never pursued. Yet on the last review of the Local Plan it appeared again but this time as a high density residential development site which unfortunately failed the sustainability criteria as we enjoy a remote rural location albeit with no local community facilities. To have had high density development in this location would have been a planning disaster for the village.

Now in 2017 lo and behold here we are again. I wonder whether the Council is determined to see this site developed for housing. It has failed on two previous reviews of the Plan. Why on earth should it be thought suitable on this occasion? Is it that it was suggested by the Planners twenty and more years ago? If so this is appalling planning to have identified a site for amenity open space and then to build on it. I said this on the occasion of the last review. In my day open space was sacrosanct and protected from development. You can’t have it both ways.

In any event the reasons for including it are very thin. All new residents would still have to travel by car for all their basic needs as the village has no local amenities except the Pleasure Ground, the village hall and the...
“Rumburgh Buck”. The pub is thriving and has no need of new housing to survive. Besides how do we know that residents of any new houses would actually use the pub?

The passage of years has seen the publication of the report on the harmful effect of National Grid high voltage cables on nearby residents. This site is traversed by cables in the southeast corner and I wonder how much of it would be suitable for development or for that matter, use for public open space. I think it was suggested in the report that 100 yards was a safe margin away from the cables.

I suspect this site is included in the Draft Local Plan yet again as one that will be eliminated as unsuitable at a later stage. The case history does support this view. I expect, therefore, that is process in merely "going through the motions" and I hope that wiser counsels will prevail once again. We have no development on that side of Mill Road until Mill Cottage and it's best left that way.

Without prejudice to the above I see that the proposals for the site would locate the new open space opposite the Pleasure Ground yet you say the development on the site should mirror that of the Street. This is semi-detached on that site of the road. The predominant frontage to the site is in Mill Road which is built with individually-styled detached property. I would argue that balance dictates that this is the style of development that should be followed along that frontage and not the style from the Street just to make up the numbers. Smaller units could be included at the rear if space permitted.

Attached documents
Rumburgh Parish Council Boyd Coote

Section WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID 822

Comment Rumburgh Parish Council concerns about the 'Waveney draft local plan'
Site WLP7.18. Land adjacent Mill Bungalow, Rumburgh.

Water & Sewage
Mains water pressure is not good and the existing mains supply pipes are old and often fracture.
Rumburgh already has major problems relating to mains sewage in this area and council feel extra dwellings plus the large amount of water run-off will break the system.

Facilities and Transport
Twelve dwellings would dramatically increase traffic volume to/from the village. This would also impact on surrounding villages which are already struggling with traffic (Wissett).
Rumburgh does not have any services or facilities (shop, school, Post Office, GP Surgery, public transport etc.) therefore all services and facilities are provided by Halesworth and would involve transport through Wissett.
Rumburgh is in a rural area with little local employment therefore most employment would involve commuting, again increasing transport issues.

Environmental impact.
The scale of development would be inappropriate for the village and the surrounding area/properties. Twelve dwellings would be too intensive and would change the character of the village.
Rumburgh is classed as a small village. The current Local Plan, Core Strategy, Policy CS11 Housing, 5.64 & 5.65 indicates only small scale infill suitable for smaller villages.

www.eastsuffolk.gov.uk/newwaveneylocalplan
The 1987 Local Plan proposed at 2.42 four or five dwellings around a central green on this site.

This would remain a more acceptable size of development for the village.

**Attached documents**


Suffolk County Council Robert Feakes

Section WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

Comment ID 1637

Comment

• Rumburgh WLP7.18 (page 173) Development here would represent further infill of Rumburgh Common. The infilling of extant or enclosed village greens such as this, is detrimental to the historic form and character of the settlement. Greens and Commons are a characteristic feature of the High Suffolk Claylands and large greens and commons both extant and enclosed are a particular feature of this area. The layout and scale of the housing should be constant with the historic infill to date, in terms of road frontage and back land plots and a geometric arrangement, rather than a contemporary suburban style with curving roads or cul-de-sacs.

Attached documents
**Suffolk County Council Robert Feakes**

**Section**
WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh

**Comment ID**
1740

**Comment**
Provide footway along site frontage on both The Street and Mill Road

**Attached documents**
### Suffolk County Council Robert Feakes

<table>
<thead>
<tr>
<th>Section</th>
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<td>Comment</td>
<td>Surface water flood risk (1 in 30 &amp; 1 in 100) along site boundaries</td>
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**Attached documents**
Willingham (Shadingfield and Willingham St Mary) Site Allocations

Section Willingham (Shadingfield and Willingham St Mary) Site Allocations

Comment ID 596

Comment It's proposed that Willingham (next to Shadingfield next to Brampton) has a 69% increase! – therefore a possible increase of a couple of hundred new cars! How can all that help the environment, doctors surgeries, hospitals (lack of) etc? Is the vision to create a ribbon of development along the A145 from Beccles to Brampton?

Attached documents
Colin Blunn

Section Willingham (Shadingfield and Willingham St Mary) Site Allocations

Comment ID 205

Comment [WLP7.19/WLP7.20] Shadingfield and Willingham do not have the facilities for new houses i.e. bus service 4 to 6 buses a day shops none electric supply will need upgrading. Sewage will need up grading. Sotterley Rd is to narrow will need up grading because of farm equip using the road.

Beccles doctors can't cope now and with all the new homes your looking at they will not cope then as they are 5/6 doctors short now and another one is going part time so theres no chance seeing them.

With over a 1000 homes your looking where is the work and all what goes with it?

Attached documents
Sandra Broom

Section Willingham (Shadingfield and Willingham St Mary) Site Allocations

Comment ID 673

Comment Utilities:

Chartres Piece has very low water pressure and the existing metal pipes are already very corroded and past its natural life span. We have already had 2 bursts/leaks on our property and have witnessed numerous leaks in the nearby area. A new housing estate or tow would have a very negative impact on an already poor service.

Existing telephone wires are again very old, overloaded and obsolete for modern requirements as a BT engineer recently confirmed as the whole area experiences very slow broadband and frequent break down of supply.

Again electricity supply is already running beyond capacity with frequent power loss and long periods of reduced power.

Beccles doctor surgery is so poorly provided and can not cope with the level of demand.

There is limited healthcare facilities

Ongoing threat from large-scale development, it took 2 years to pass my personal house extension plans and i had to consider the "look" of all the other houses, people's privacy and views, whether we overlooked other properties etc. When we pointed out that a neighbour had already had an extentions similar to what we wanted we were told by the housing development officers that "2 wrongs don't make a right" and yet now the proposed site will totally ruin the "look" of the whole village! Why should personal development struggle so much and big developers get whatever they want! I do not want people looking directly into my house and garden; to be living in a building site and not to hear the sounds of owls each night! I don't want light pollution from all the extra housing.

I agree with the following points:

There is poor infrastructure; poor transport links; lack of restaurants and
bars; too many cars and traffic congestion;

poor public transport in villages; poor internet and phone connection; lack of aspiration and poor educational attainment and low economic growth and low wages.

Visions also should include the need to protect wildlife, habitats and open spaces, reducing car use and less new road infrastructure. It was also noted that design quality needed to improve and that there should be local architectural prizes.

Rural schools would need to have bigger classes and have already had to cope with recent changes with the changes from middle schools. They have been battered by Ofsted and are beginning to improve. The increase in numbers would be detrimental.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Willingham (Shadingfield and Willingham St Mary) Site Allocations

Comment ID 1429

Comment

The draft consultation document sets out the local plan strategy for Willingham and details the two draft site allocations for the village.

The Sotterley Estate supports both the strategy for the village and the quantum of development proposed.

The draft allocation sites WLP7.19 and WLP7.20 are owned by the Sotterley Estate and remain available, achievable and deliverable.

As has been set out in previous submissions the Sotterley Estate has for a long time now promoted the idea of new development which helps to provide local services and facilities.

The Sotterley Estate also acknowledges the statements elsewhere in the draft local plan indicating that whilst the overall quantum of development and strategy for its distribution will be set by the local plan, the final detail and arrangement of site allocations and distribution within the villages could, where relevant, be dealt with by neighbourhood plans.

Attached documents
WLP7.19 - Land East of Woodfield Close, Willingham

Caroline McDonald

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 608

Comment I write to express my concerns and objections to the proposed development of plot WLP7.19.

1. Habitat.
   * Fallow area surrounded by agricultural land
   * Buffer zone providing habitats for a wide range of wildlife
   * As fallow land, it differs from other proposed areas which are all farmed

   The proposed site, WLP7.19, differs from all the other plots, in the local area, suggested in the WLP, as it is not farmed. It is surrounded by agricultural land and therefore serves a vital role in providing a buffer zone for wildlife and plants. Buzzards and Barn Owls use the site as a hunting ground and an array of smaller mammals live there. The pond in the southern most end provides a habitat for amphibians and reptiles. The site also has a range of meadow flowers.

   Building houses on this site would destroy this valuable habitat, and as there is not a similar environment locally, lead to a loss of wildlife. For these reasons I feel other agricultural plots would be more suitable for development.

2. Access
   * Woodfield Close is too narrow to accommodate an increase in through traffic
   * Noise, congestion, pollution and safety

   Woodfield Close is a narrow block weaved road, which is only designed for light, occasional traffic. WLP7.19 proposes to build ten houses. With car use being vital in the village due to a lack of adequate alternatives, as bus...
services are very irregular, this could potentially result in an increase of up to twenty more vehicles being parked and driven along Woodfield Close. At present two cars passing each other have to do so at minimum speed and when passing delivery lorries, cars are required to pull onto the verge in order that they might pass. Therefore Woodfield Close is unable to support an increase in traffic.

Extra vehicles will adversely affect Woodfield Close by increasing noise, congestion and pollution. It would also mean it would no longer be a safe place for children to play and cycle.

3. Historical Building

* Detrimental effect on a historical building

* Affect outlook and 'character of the existing settlement'

Bordering plot WLP7.19 on two sides is Crossbow Cottage. This traditional Suffolk Long House dates back 500 years and is of local historical significance. At present woodland and plot WLP7.19, provide a sympathetic back drop and setting allowing its integrity as a 17th century building to remain intact. Developing the land behind Crossbow cottage would result in the property being surrounded on all sides by modern development, thus having a hugely detrimental effect on its character and outlook.

4. Drainage and Flooding

* Site has poor drainage

* Drainage ditches for adjoining houses are on plot WLP7.19

The land bordering plot WLP7.19 and the plot itself are made up of clay soil and are poorly drained. Particularly in winter the paddock and surrounding gardens become water logged and result in damp in the surrounding properties. A drainage ditch has recently been cleared and extended in order to help relieve the situation – however it is located on the land that has been proposed for development. Building on this land will have adverse effects on both the existing residences and those newly built.

5. Local Infrastructure

* Significant effect on broadband network

* Lack of local amenities

At present my husband, in common with many in the local area, relies on
the internet in order to work from home and earn his living. Broadband speed in the village is already poor and Superfast broadband is not available. Building on WLP7.19 and the neighbouring plot WLP7.20 will slow broadband further and have a harmful effect on local businesses.

Willingham St Mary and Shadingfield have no shop or school and only a small hall, pub and a very basic park. For these reasons I believe the proposed development in Worlingham would be better suited, as facilities and infrastructure exist to support an increase in population.

For the reasons stated I strongly feel that WLP7.19 is not a site suitable for development. Development on plots that use agricultural land, that are not overlooked by existing properties and that are close to amenities and infrastructure would be far more suitable.

We would like to put forward our concerns regarding the proposed development as named above.

Shadingfield and Willingham are two joined villages in a very rural setting with few amenities.

Woodfield Close has a narrow, paved road where visiting commercial traffic is already a problem, and causes a temporary blockage in the road so an increase in regular traffic would, were they needed, restrict emergency vehicles from having access.

Further use of this road by an addition of around 20 vehicles would put an enormous strain on the construction of the road and difficulties for existing residents. Children would be unable to play in this currently quiet road unaccompanied.

Woodfield Close contains a 17th Century Long House which stands next to the proposed access to the new development, thus endangering the fabric of this historical building. Furthermore, the new development would mask the present outlook for this building.

The land consists mainly of clay and is often waterlogged. Existing drainage would be compromised and new systems would be required before building commenced.

A major point is that services, such as water pressure, drainage and sewerage are not sufficient to accommodate such a large increase of houses in this rural area.

The proposed building site is an important area for wildlife, including some endangered species. There is also a pond on the site used by many amphibians.

The headlights of cars exiting the new development after dark would shine
straight into our lounge windows, causing undue nuisance.

Attached documents
Edward Baker

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 762

Comment Comments on Waveney Local Plan WLP7.19

I live in Woodfield Close, which is very close to the proposed entrance to the new development, and would not like the development to take place due to the following reasons.

Rural Character

We moved to this location three years ago due to wanting the peace and tranquillity of being in a rural location, surrounded by countryside and the new development will change this. The strip of land is not currently farmed and provides a wildlife corridor between fields and a woodland strip (with a bridlepath) making it a haven for wildlife. This is a very popular walkway for local residents plus all ramblers and away from country roads with no safe pathway.

Facilities and Transport

The village has very few facilities and only four buses a day with no service on Sundays. This means that car journeys are a necessity. Ten new homes would probably add about 20 cars to local traffic and Woodfield Close is not suitable for this extra load. Sotterley Road, from the A145 to Woodfield Close has a footpath on one side only and is not well maintained and with some parts of it usually unusable due to poor drainage with tree and mud debris, causing pedestrians to have to walk in the road, which will be more dangerous with the increased traffic. Broadband speed is not good and we suffer frequent power cuts. We have no local shop for provisions which would save local residents from using transport into Beccles constantly adding to the negative impact on the environment.

Encroachment on private land

The southern (Willingham) part of Woodfield Close, where I live, is unadopted meaning that any maintenance would be at the expense of
those living at numbers 9 to 17 (7 houses). The grass strips on either side of the road belong to some of these properties, mine being one, and have to be maintained at all time by these residents. There is nothing to indicate that this part is private and I foresee that the new residents, especially their children, may make use of our private land.

Construction Nuisance

Due to the rural nature of Sotterley Road, i.e. narrow, not well-drained, partially unusable footpath, the impact of construction vehicles will be heavy as it will be on Woodfield Close with its brickweave driveway and no footpaths.

Attached documents
Kieran McDonald

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 508

Comment Willingham is a small community in open countryside undeserving of development on this scale (30% expansion of dwellings is proposed). It will alter its nature, affect drainage, destroy important habitats, reduce already slow broadband speeds, increase vehicular traffic and pollution, and affect the outlook of existing properties. I object to both proposed developments, WLP7.20 and WLP7.19, but WLP7.19 in particular:

Drainage – The paddock (WLP7.19), and as a result the adjoining properties, have very poor drainage and are largely sodden in winter. Developing this site will limit access to maintain the existing ditches and drains. Furthermore if the land proposed as access from Woodfield Close is developed then the existing ditch adjoining the two fields will have to be filled or piped further exacerbating the issue.

Access – Developing WLP7.19 depends upon access via Woodfield Close. The existing Woodfield Close access is narrow - two moving vehicles cannot pass each other. A parked large vehicle can easily block emergency vehicle access. The new development will increase traffic throughput through this narrow close, posing a risk to pedestrians and playing children, and radically alter the nature of the neighbourhood.

Facilities & Infrastructure – Community facilities are said to be within walking distance. The community facilities are a pub, a very basic park, village hall and a post box. Desirable facilities don’t exist to support an expanded local community (WLP7.19 & WLP7.20). The extra vehicular traffic, that will come with the development, travelling to neighbouring settlements (shops, schools, post office, GP surgery, places of work…) in the towns, will increase dramatically. This will increase pollution and danger to pedestrians (Sotterly Road doesn’t have footpaths east of Woodfield Close).

Habitation – WLP7.19 is listed as used for agriculture. WLP7.19 hasn’t been put to agricultural use in many years and is currently unmanaged/meadow largely surrounded by intensively farmed agricultural land. As a result
WLP7.19 is important for the local wildlife, including raptors and particularly the local barn owl population.

Broadband – Additional development (WLP7.19 and WLP7.20) will load the broadband network. The broadband network bandwidth and data-rate is already poor. Further development will exacerbate this. As a home worker I am dependent upon this for my livelihood.

Outlook – The plan states that it will 'reflect the character of the existing area' and will not 'adversely affect the character of the existing settlement'. Our property, Crossbow Cottage, is adjacent to WLP7.19. While Crossbow cottage is not currently listed, it is a 17th century Suffolk long house of unique character and features. It is currently surrounded by existing modern development on two sides. The proposed new development will completely enclose the property, on all four sides, with modern development seriously affecting its outlook. The new development will directly overlook the property. We're considering applying to Historic England to have the property listed.

Developments of this scale should be kept for the towns and their satellite large villages. If the development that leads to the jobs is in the towns, then the housing should be provided in or near to the towns, with the appropriate facilities and infrastructure, and not in what is effectively open countryside.

Attached documents
Rosemary and Alan Corcoran

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 921

Comment Re : Waveney Local Plan WLP 7.19

We consider the site to be inappropriate ;-

1. Development of this site and the other proposed in Sotterley Road will virtually double the population of this rural village and destroy its unique nature which is against the basic principles of this process and planning legislation in general. One of the foundations of the Local Plan is the need to protect the character of existing developments and this proposal couldn't be more contradictory.

2. The site is a haven for wildlife and in this respect natural England should be consulted. Heron, Barn owls, sparrow hawks, curlew and a multitude of small birds and mammals rely upon the habitat, which for the majority of the year is a bog.

3. The London Road / Sotterley Road is a dangerous junction and the developments would seriously increase the danger.

4. There is no infrastructure to support the doubling of the population. The report highlights that there is a pub and a village hall, the pub is up for sale and has been the subject of residential planning in the past.

5. If it is deemed acceptable to build here there are far more suitable sites around, and as it would seem green belt is now openly available that should not be a problem. The football pitch is never used and would allow direct access to services and the main road. The land at the rear of the pub is currently being developed as a residential mobile home site, that will also increase the population significantly, and if that is considered acceptable then extend that site.

6. It seems logical to me that if such controversial sites are deemed appropriate they should be sited where there is an infrastructure available, a nearby example is Brampton, which has a school and a railway station. It
is commonly recognised in education terms, that small schools such as this are being closed in Norfolk and Suffolk due to lack of pupils, joined up thinking in planning terms could help.

**Attached documents**
Sandra Broom

Section  WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID  671

Comment  I am very opposed to the proposed development of WLP7.20 and WLP7.19 and would much prefer the alternative site of 94. This is mostly because of the extra traffic that would have to enter Sotterley Road. Sotterley Road narrows into a single track even before you reach Chartres Piece as you turn off the A145 at which point the footpath stops. Furthermore there is no street lighting. Large farm machines and lorries servicing the Sotterley estate travel up and down Sotterley Toad throughout the day starting very early morning until late at night. These vehicles take up the whole of the road forcing pedestrians, cyclists and other off the road to pass. This is a very narrow road and there have already been accidents on this road. One neighbour was killed crossing the A145 to return to Chartres Piece, a young boy had to be airlifted to hospital after being knocked off his bike and only a few weeks ago a neighbour’s dog was killed on this road. Furthermore if you built the houses behind Chartres Piece and Woodfield Close all persons/traffic would have to use the already inadequate and dangerous Sotterley road which is already over used and then have to cross the A135 to use the pub, public and school bus stops and all the increased traffic would have to cross the A145 to get to Beccles amenities. The amenities in Beccles are already stretched and with all the proposed increases in population this would be far worse. To leave the A145 and join Sotterley road the junction is very tight and larger vehicles and poor drivers turn in and end up driving on the other side of the road. Many horses, cyclists, walkers and dog walkers use the footpaths and sotterley trail which runs behind Woodfield Close and Chartres Piece enjoying the natural habitat and wildlife which would be destroyed by the proposed housing estates. If the housing estates are built at the proposed plots then I would estimate as according to the amount of cars per household just in our road an average of 2 to 3 cars per household. This would have a severe effect on the safety of the community as the existing infrastructure as previously mentioned in already inadequate.

My house presently looks out over rolling fields and the sound and sights of
nature and lack of light pollution makes star gazing/bird watching beautiful additions to my life. I extended my house and made floor to ceiling windows both upstairs and down in order to capture the beauty of my surroundings. Having one of the few privately owned houses my house will devalue if this is taken away and will take away my privacy and sanctuary. These are all things I hold dear. This has caused me incredible distress.

The quiet road is safer for my children and animals.

I would suggest if the houses are built on Mill Lane the road is already suitable for 2 cars to pass and as it is a dead end does not suffer as much use of heavy farm machines and lorries and vehicles using Sotterley Road as a rat run for Wrentham/Lowestoft/Carlton Colville.

Houses built on Mill Lane would be on the right side of the road to use village amenities and cars would enter the flow of traffic heading towards Beccles on the A145. Again pedestrians from Mill Lane would already have in place a large footpath on the correct side of the road for them to access school/public buses, village hall and pub. WE would need a zebra crossing erected to cross the A145 to allow existing residents to access public amenities more safely and likewise persons wishing to use the playing field.

The construction of houses on Mill Lane would also see an even spread of housing across the village which would be more in keeping with the historic nature of the development of a rural village as opposed to trying to make one giant housing estate. This is not why we moved to such a rural area! If we wanted to live in a built up area we would have moved to one. Village life is wonderful and naturally houses have to be built but not all in such a small area. It would double the size Woodfield Close and Chartres Piece which are the only 2 roads with several houses on in the village! Spread them out! Furthermore Mill Lane has mostly bungalows with built up hedges so you would not be spoiling their view and have such a negative impact on their lives.

Also the impact on existing hedges, trees and natural habitats would be greatly reduced as building on the plots you have proposed would see massive destruction of beautiful natural habitats and wooded areas, along with country footpaths and trails, whereas Mill Lane is just farm land.
Shadingfield, Sotterley, Willingham & Ellough Parish Council Marie Allen

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 906

Comment At its meeting on the 20th September the first draft of the Local Development Plan was discussed, in particular Policies WLP7.19 Land East of Woodfield Close Willingham and WLP 7.20 Land North of Sotterley Road Willingham.

The Council considers the total number of proposed dwellings 40 over the two sites to be excessive in terms of its relationship to the current housing stock that abuts the proposed sites. Whilst the proposals for WLP 7.19, namely 10 dwellings, would be broadly acceptable, the proposal for WLP 7.20 of 30 dwellings is felt to be excessive and a lower figure should be considered. Council is concerned about the amount of traffic generated by the development and its impact on the junction of Sotterley Road and the A145. It is appreciated that final design and size of the dwellings will be determined at a later stage the Council would wish to see a mix of housing and designs that protect the rural nature of the Village. The Council endorses the view expressed by the Suffolk Preservation Society in its response to Waveney District Council.

Attached documents
Sharon Baker

**Comment ID**: 697

**Section**: WLP7.19 - Land East of Woodfield Close, Willingham

**Comment**: I live in Woodfield Close, near to the proposed entrance to the new development, and would not like the development to take place due to the following reasons.

**Rural Character**

We moved to this location as we enjoyed the peace and tranquillity of being in a rural location, surrounded by countryside and the new development will change this. The strip of land is not currently farmed and provides a wildlife corridor between fields and a woodland strip (with a bridlepath) making it a haven for wildlife.

**Facilities and Transport**

The village has very few facilities and only a few buses a day. This means that car journeys are a necessity. Ten new homes would probably add about 20 cars to local traffic and Woodfield Close is not suitable for this load. Sotterley Road, from the A145 to Woodfield Close has a footpath on one side only and is not well maintained and with some parts of if usually unusable due to poor drainage and mud, causing pedestrians to have to walk in the road, which will be more dangerous with the increased traffic. Broadband speed is not good and we suffer frequent power cuts.

**Encroachment on private land**

The southern part of Woodfield Close, where I live, is unadopted meaning that any maintenance would be at the expense of those living at numbers 9 to 17 (7 houses). The grass strips on either side of the road belong to some of these properties, mine being one, and have to be maintained by these residents. There is nothing to indicate that this part is private and I foresee that the new residents, especially their children, may make use of our private land.

**Construction Nuisance**
Due to the rural nature of Sotterley Road, i.e. narrow, not well-drained, partially unusable footpath, the impact of construction vehicles will be heavy as it will be on Woodfield Close with its brickweave driveway and no footpaths.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section
WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID
1430

Comment
The draft local plan proposes to allocate the land east of Woodfield Close for 10 dwellings.

The site was submitted by the Sotterley Estate at the call for sites stage and remains available, achievable and deliverable going forwards.

The Sotterley Estate support the draft policy WLP7.19 in principle but also the proposed site specific criteria.
Suffolk County Council Robert Feakes

Section WLP7.19 - Land East of Woodfield Close, Willingham

Comment ID 1741

Comment Extend footway along Sotterley Road

Attached documents
WLP7.20 - Land North of Sotterley Road, Willingham

Carol Tomley

Section

WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID

204

Comment

I am deeply upset and angry at your proposed building plans for 30 houses. The buildings are to be at the bottom of my garden. I chose to live in the countryside because I prefer open fields to houses. My neighbours feel the same. Why have you chosen that site? The field across the road behind the Woodside plot seems more sensible. That would not affect existing homes. Yet you want to build where it would cause maximum upset.

Behind my house is a massive oak tree several hundred years old I believe. Surely you wouldn't destroy that!

I was informed that you want to build near existing houses because to want to build a community. We already have one. We are the countryside. Not a town not even a village. Leave us alone please.

Attached documents
Kieran McDonald

Section  WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID  509

Comment  Willingham is a small community in open countryside undeserving of development on this scale (30% expansion of dwellings is proposed). It will alter its nature, affect drainage, destroy important habitats, reduce already slow broadband speeds, increase vehicular traffic and pollution, and affect the outlook of existing properties. I object to both proposed developments, WLP7.20 and WLP7.19:

Facilities & Infrastructure – Community facilities are said to be within walking distance. The community facilities are a pub, a very basic park, village hall and a post box. Desirable facilities don’t exist to support an expanded local community (WLP7.19 & WLP7.20). The extra vehicular traffic, that will come with the development, travelling to neighbouring settlements (shops, schools, post office, GP surgery, places of work…) in the towns, will increase dramatically. This will increase pollution and danger to pedestrians (Sotterly Road doesn’t have footpaths east of Woodfield Close).

Broadband – Additional development (WLP7.19 and WLP7.20) will load the broadband network. The broadband network bandwidth and data-rate is already poor. Further development will exacerbate this. As a home worker I am dependent upon this for my livelihood.

Developments of this scale should be kept for the towns and their satellite large villages. If the development that leads to the jobs is in the towns, then the housing should be provided in or near to the towns, with the appropriate facilities and infrastructure, and not in what is effectively open countryside.

Attached documents
Sandra Broom

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 672

Comment

I am very opposed to the proposed development of WLP7.20 and WLP7.19 and would much prefer the alternative site of 94. This is mostly because of the extra traffic that would have to enter Sotterley Road. Sotterley Road narrows into a single track even before you reach Chartres Piece as you turn off the A145 at which point the footpath stops. Furthermore there is no street lighting. Large farm machines and lorries servicing the Sotterley estate travel up and down Sotterley Toad throughout the day starting very early morning until late at night. These vehicles take up the whole of the road forcing pedestrians, cyclists and other off the road to pass. This is a very narrow road and there have already been accidents on this road. One neighbour was killed crossing the A145 to return to Chartres Piece, a young boy had to be airlifted to hospital after being knocked off his bike and only a few weeks ago a neighbour’s dog was killed on this road. Furthermore if you built the houses behind Chartres Piece and Woodfield Close all persons/traffic would have to use the already inadequate and dangerous Sotterley road which is already over used and then have to cross the A135 to use the pub, public and school bus stops and all the increased traffic would have to cross the A145 to get to Beccles amenities. The amenities in Beccles are already stretched and with all the proposed increases in population this would be far worse. To leave the A145 and join Sotterley road the junction is very tight and larger vehicles and poor drivers turn in and end up driving on the other side of the road. Many horses, cyclists, walkers and dog walkers use the footpaths and sotterley trail which runs behind Woodfield Close and Chartres Piece enjoying the natural habitat and wildlife which would be destroyed by the proposed housing estates. If the housing estates are built at the proposed plots then I would estimate as according to the amount of cars per household just in our road an average of 2 to 3 cars per household. This would have a severe effect on the safety of the community as the existing infrastructure as previously mentioned in already inadequate.

My house presently looks out over rolling fields and the sound and sights of
nature and lack of light pollution makes star gazing/bird watching beautiful additions to my life. I extended my house and made floor to ceiling windows both upstairs and down in order to capture the beauty of my surroundings. Having one of the few privately owned houses my house will devalue if this is taken away and will take away my privacy and sanctuary. These are all things I hold dear. This has caused me incredible distress.

The quiet road is safer for my children and animals.

I would suggest if the houses are built on Mill Lane the road is already suitable for 2 cars to pass and as it is a dead end does not suffer as much use of heavy farm machines and lorries and vehicles using Sotterley Road as a rat run for Wrentham/Lowestoft/Carlton Colville.

Houses built on Mill Lane would be on the right side of the road to use village amenities and cars would enter the flow of traffic heading towards Beccles on the A145. Again pedestrians from Mill Lane would already have in place a large footpath on the correct side of the road for them to access school/public buses, village hall and pub. WE would need a zebra crossing erected to cross the A145 to allow existing residents to access public amenities more safely and likewise persons wishing to use the playing field.

The construction of houses on Mill Lane would also see an even spread of housing across the village which would be more in keeping with the historic nature of the development of a rural village as opposed to trying to make one giant housing estate. This is not why we moved to such a rural area! If we wanted to live in a built up area we would have moved to one. Village life is wonderful and naturally houses have to be built but not all in such a small area. It would double the size Woodfield Close and Chartres Piece which are the only 2 roads with several houses on in the village! Spread them out! Furthermore Mill Lane has mostly bungalows with built up hedges so you would not be spoiling their view and have such a negative impact on their lives.

Also the impact on existing hedges, trees and natural habitats would be greatly reduced as building on the plots you have proposed would see massive destruction of beautiful natural habitats and wooded areas, along with country footpaths and trails, whereas Mill Lane is just farm land.

Attached documents
Shadingfield, Sotterley, Willingham & Ellough Parish Council Marie Allen

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 907

Comment At its meeting on the 20th September the first draft of the Local Development Plan was discussed, in particular Policies WLP7.19 Land East of Woodfield Close Willingham and WLP 7.20 Land North of Sotterley Road Willingham.

The Council considers the total number of proposed dwellings 40 over the two sites to be excessive in terms of its relationship to the current housing stock that abuts the proposed sites. Whilst the proposals for WLP 7.19, namely 10 dwellings, would be broadly acceptable, the proposal for WLP 7.20 of 30 dwellings is felt to be excessive and a lower figure should be considered. Council is concerned about the amount of traffic generated by the development and its impact on the junction of Sotterley Road and the A145. It is appreciated that final design and size of the dwellings will be determined at a later stage the Council would wish to see a mix of housing and designs that protect the rural nature of the Village. The Council endorses the view expressed by the Suffolk Preservation Society in its response to Waveney District Council.

Attached documents
Sharon Baker

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 827

Comment Rural Character

We moved to this location as we enjoyed the peace and tranquillity of being in a rural location, surrounded by countryside and the new development of these 30 dwellings along with the 10 proposed in WLP7.19 will change this.

Facilities and Transport

The village has very few facilities and only a few buses a day. This means that car journeys are a necessity. Theses 30 proposed dwellings and the 10 in WLP7.19 would probably add about 80 cars to local traffic. Sotterley Road, from the A145 to Woodfield Close, has a footpath on one side only and is not well maintained and with some parts of it usually unusable due to poor drainage and mud, causing pedestrians to have to walk in the road, which will be more dangerous with the increased traffic. Broadband speed is not good and we suffer frequent power cuts.

Construction Nuisance

Due to the rural nature of Sotterley Road, i.e. narrow, not well-drained, partially unusable footpath, the impact of construction vehicles will be heavy.

Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section
WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID
1431

Comment
The draft local plan proposes to allocate the land north of Sotterley Road for 30 dwellings.

Land in this location was submitted by the Sotterley Estate at the call for sites stage. The Council's variation of the site's size and shape is welcomed. The draft allocation site remains available, achievable and deliverable going forwards.

The Sotterley Estate support the draft policy WLP7.20 in principle and the proposed site specific criteria.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 1742

Comment Extend footway along Sotterley Road and link into site

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 1686

Comment No evident discharge strategy for the site. Soil conditions are marginal for infiltration, no watercourses, no AW surface water system

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 1654

Comment Policy WDM1 of the Waste Core Strategy states that the County Council "will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made." The following site allocation policies are within proximity of waste facilities. Proposals on these sites must ensure that they do not prevent or prejudice the use of nearby waste facilities:

- Housing Allocation Policy WLP7.20 – this site is within 400m of a sewage treatment works.

Attached documents
Suffolk Preservation Society Fiona Cairns

Section WLP7.20 - Land North of Sotterley Road, Willingham

Comment ID 726

Comment We consider that the number of dwellings at 30 is disproportionately large in relation to the existing 135. The site is poorly related to the village edge and would have a harmful impact on the landscape character as it intrudes into the countryside. The scale of the development will mean that the landscape impacts will be hard to mitigate.

Attached documents
Westhall Strategy and Site Allocations

John Jackson

Section Westhall Strategy and Site Allocations

Comment ID 545

Comment While the plan seems to try and take into account the character of the village, there are several things to consider before determining that this is a suitable location for a development. First, when listing the amenities in the village, it does not take into account that the public house is currently not in operation, and due to the age of the owner of the food store and post office, its future may be in doubt as well. The amount of walkers along Locks Rd. as well as its use for horse riders would mean that the extra amount of traffic in and out of that area would present a danger and limit its current use. Further, there has been no additional work on the infrastructure of the village in terms of water or sewer and, while 14 houses may not seem like much, this area would struggle to cope with the additional traffic. I would continue to be opposed to such a development.

Attached documents
Lorraine Knight

Section Westhall Strategy and Site Allocations

Comment ID 45

Comment Existing community facilities supporting first draft plan i would suggest are incorrect and lack substance!

* The Public House has been not operating for approximately 13 months and is currently still for sale!

* When the Village Store inevitably has a change in circumstance, there is no guarantee the Post Office will still be there providing a service. Many rural/local Post Offices have shut as have village stores themselves!

* Broadband speeds are very slow in Westhall, with no signs of an improvement from the provider in this area!

Attached documents
Sally Self

Section  Westhall Strategy and Site Allocations

Comment ID  418

Comment  Am concerned about the level of traffic involved if planning goes ahead, access appears to be ok if somewhat small. In regard to the local public house this has been closed for a reasonable period of time which is inconvenient if a property is bought with amenities such as this are mentioned. Uncertain if I want properties built directly behind where I currently live on Locks Rd Westhall.

Attached documents
WLP7.21 - Land West of Lock's Road, Westhall

David Harvey

Section
WLP7.21 - Land West of Lock's Road, Westhall

Comment ID
1280

Comment
Two of the stated specific criteria for site development are outside of the developers/planners control.

Westhall playing field is owned by the Village Hall, Recreation Ground and Playing Field charity of which I am a trustee.

Dogs are not allowed on any part of the playing field and as a result dog fouling is not a problem or issue for us.

I am against providing any form of access to the playing field from the proposed new development as it would encourage dog walkers, create rights of way across our football pitch (as a short cut to the shop and pub) and cause security problems.

Both the hedge and ditch along the western boundary of the proposed development are the property of the charity and any changes to them would need our permission. The hedge is maintained at about 15 feet in height to provide shelter, privacy and security. Therefore any properties positioned to face our boundary would look out at the hedge and also at the high voltage power lines and transformers which supply the village and run along this boundary.

Attached documents
Duncan Empey

Section  WLP7.21 - Land West of Lock’s Road, Westhall

Comment ID  821

Comment  My main concern is about adequacy of infrastructure and services. There have been issues with drainage in the Locks Road area. Also Broadband speeds are very slow in this part of the village (sometimes barely 1.5 Mbps) and will be even worse if an additional 14 households are added to the system. If BT has not already extended the fast fibre service to this part of the village by the time this proposal is considered I suggest that funding of such an extension to improve the service to the Locks Road and Mill Common area be a condition of any approval.

Attached documents
George Harvey

Section WLP7.21 - Land West of Lock's Road, Westhall

Comment ID 1277

Comment

This site was proposed for development when previous local plans were being drafted, however for various reasons it was not included and I do not think anything has fundamentally changed to make this site more suitable now.

As already mentioned, Westhall is characterised by linear, frontage only development and the proposed site is not in keeping with that. I also believe that the 14 proposed houses could easily be accommodated within the existing village envelope in the frontage gaps along Wangford Road and also elsewhere in the parish where small groups of dwellings already exist (such as Cox Common). This approach would be more in character and would I believe be less imposing and have a smaller impact than the single development of houses behind Lock's Road.

Looking in detail at the "site specific criteria" in Policy WLP7.21, I am surprised at some of the statements made. I am a trustee for the charity which owns and operates the adjacent village hall, recreation ground and playing field. At no point have we been consulted about the proposal to create a new access point to our land from the proposed development and the trustees may not be agreeable to this happening. I would also like to point out that the boundary hedge and ditch, between the proposed development and the playing field, belongs to the village hall charity.

Speaking personally I would have serious concerns about the creation of a new access. I can foresee that the new access would naturally create a route which people would use as a shortcut, crossing the playing field to the existing entrance by the village hall. This would end up being used like a public right of way and would be difficult for us to control, particularly when the field is booked for private events, causing conflict.

People would also be very tempted to use this shortcut across the playing field accompanied by their dogs. Dogs have been banned (except temporarily for certain events) from the playing field and recreation ground
for well over 30 years. Currently we have very little trouble in enforcing this ban as the playing field is not a through route and the only entrance is also adjacent to the village green, where dogs are allowed, so people simply go there instead.

Therefore I believe that the statement about creating direct public access to the recreation open space should be removed from the policy.

Messrs M and P Howland
Durrants (Nick Durrant)

Section WLP7.21 - Land West of Lock’s Road, Westhall

Comment ID 1190

Comment 2. The Land

2.1 Land holding encompassed under policy WLP7.21.

3. The Proposal

3.1 We wish to confirm our support for the allocation of the land owned by Messrs M and P Howland under policy WLP7.21. We confirm firstly the availability of all the land for development and secondly our commitment to ensure its delivery during the Local Plan period to provide much needed housing stock for the local area.

3.2 The landowners accept that Policy Land WLP7.21 will be developed following the principles of the First Draft WDC plan set out on page 180 of that document.

3.3 The First Draft Local Plan states that more people are moving into the Waveney District from elsewhere in the UK than are leaving, while households in Waveney are also getting smaller. Even with no population growth the demand for housing is growing. The development of the land included within policy WLP7.21 will assist the Council in addressing these issues and meeting the housing need during the Local Plan period. Additional benefits to be achieved from the development of this site include the provision of much needed affordable housing and sizeable CIL contributions to be used towards the improvement of existing and provision of new infrastructure and facilities. Furthermore there will be an improvement in the natural surveillance of the Recreational Ground which enhance its relationship with the surrounding residential area for the benefit of future and existing residents and the wider community.

4. Development Progress

4.1 The Landowners made a submission to WDC under the Call for Sites
consultation which closed on 9th January 2016. They now wish to see Policy WLP7.21 proceed in an orderly and structured way.

Attached documents
This development would be right on my back door step and effect us
tremendously were this to go ahead. Not only with noise but with all the
additional traffic on the roads. I know with developments the view from my
window is not considered but from a lovely looking field to a housing
development I may as well go back to living in Halesworth. The exact place I
moved away from to have this idealistic country lifestyle not a concrete
jungle on my doorstep.

I have many thoughts on this development and can not see why Westhall
needs to have an additional 14 houses produced on 1 site. There are
numerous plots in the village that have been earmarked for small
development of 3-4 houses that do not effect peoples lives as much as this
would ours.

Additional things that I think Waveney must look at are things that they
have listed incorrectly on the package that you have sent to every one.
Westhall does have a pub as a building yes. This building has been empty
for around 18 months now with no one interested in taking this on as a
pub. The most likely outcome for this is that the pub will be become a
housing development of some kind. Again another development that does
not need massive works to add it to the water and drainage unlike this large
development on the field behind my house.

The village shop and Post Office are currently a great little hub for the
village. The trouble we have with this is that the owner has said once he
passes away he wants the shop to to discontinue, those are his wishes and I
believe it is officially written in his will. This gentleman is in his early 90’s.
Not looking great there is it?!

So with a Pub that is shut and no one wants to buy and a village shop that
looks doomed in the next few years Westhall has literally got a Village hall
and a small play area to offer any potential newcomers.
The roads in and out of the village are single lane roads. We struggle enough with tractors on the road and finding places to pass. With 14 additional dwellings and at least 1 extra car per household there will be a lot more traffic on the roads. Most of this already passes my house on a daily basis, very rarely do any cars that pass stick to the speed limit a small village needs. When the weather is bad in Winter some parts of Westhall are dangerous to drive and meeting the new cars on the road certainly would not help anyone.

Schooling in this area is already completely overloaded. Trust me I know this as we have been looking into it with our daughters first placement.

Has the local wildlife been considered? We are fortunate enough to regularly have Barn Owls, Little Owls, numerous varieties of birds and on the odd occasion deer roaming around this field. Another complete shame on wildlife if this proceeds.

Drainage from the field that the development is planned for is appalling. Currently there is a slight decline in the ground from the field towards my back door. This creates a boggy garden in wet weather and needs to be sorted should any development go ahead.

The gardens that face this development were built with picket fencing facing the field. I would insist that fencing is replaced at the developers cost as this is not something I would want to have to sit and watch from my garden.

I am not against development this must be said but this will effect me so much that I feel I have to say something. One major concern I have is that if this time around the 14 house development gets given the go ahead it is all too plain to see that in future the other half of the field will be put up for development too. So in future Westhall is looking at approx 30 houses maybe the 46 that this plot was originally put in for. With the infrastructure that the village already has I highly doubt that this is going to benefit anybody in the village at present only those that are looking to make a pretty penny from selling their land.

Overall I think a village of Westhall's size needs to be able to offer much more than a village hall to lure in additional people. Looking at the local developments in places like Wenhaston. I can understand these developments taking place as they have a shop, post office, pub and primary school. Westhall simply does not have all this and I can not see how developing here will benefit anybody expect Mr Farmer who wants to make
some money.

If this development does go ahead I will be looking to move. My immediate next door neighbour has already put his house on the market as he does not want to live in the village with this hanging over everyone's heads.

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.21 - Land West of Lock’s Road, Westhall

Comment ID 1743

Comment Link into existing footways and recreational ground

Attached documents
Suffolk County Council Robert Feakes

Section WLP7.21 - Land West of Lock’s Road, Westhall

Comment ID 1687

Comment No viable discharge strategy evident - soil conditions are variable, no watercourses, no AW surface water system.

Attached documents
Westhall Parish Council Ann Donnachie

Section WLP7.21 - Land West of Lock’s Road, Westhall

Comment ID 585

Comment Westhall Parish Council agrees to the inclusion of this site in Locks Road in the Local Plan, but only insofar as the infrastructure constraints previously iterated can be satisfactorily overcome to accommodate up to 14 more houses. To recap, many properties lack mains drainage and, due to ground conditions and levels, the existing foul and surface water drainage systems in Locks Road cannot accommodate an increase in dwellings. Water pressure is very low, partly due to persistent problems with the pumping station at Halesworth, and additional housing will make further demands on the water supply. There is no piped gas, telephone coverage is unreliable due to our distance from the exchange and the age of the copper cabling, and in August 2017 Better Broadband Suffolk announced that Westhall is in the remaining 2% of Suffolk that will still NOT receive high speed broadband even during 2020. The parish is only served by single track, unkerbed, roads with passing places. Given its rural location, those roads are agricultural thoroughfares for large vehicles and machinery, and yet the passing places can only accommodate one car at a time. Also the junction of Nollers Lane (the single track road from the village) with the A143 is narrow with poor visibility, and there is little scope for widening and improved sight lines due to existing buildings. The additional traffic necessarily generated by more housing will therefore make further demands on those roads, and compromise road safety.

The Parish Council does not know how the figure of 14 has been reached, but the existing infrastructure is insufficient to accommodate even that number. 14 more houses would therefore require a considerable investment in infrastructure, and the Parish Council gives its agreement to inclusion of this site in the Local Plan on that basis.

Attached documents
Section | Housing
--- | ---
Comment ID | 550

**Comment**

Social Housing - We need more in all regeneration plans across the Borough so local people can work in the local economy e.g. Southwold, Wenhaston, Worlingham allowing buy to let landlords buy housing denies ordinary people from buying a home for their own needs and demoralises. The same applies to endless 2nd homes purchase if there is no home base for local people you end up with a ghost rural economy without buses and without working families either.

**Attached documents**
Broads Authority Natalie Beal

Section Housing

Comment ID 463

Comment 1.7, 8.2 – does this OAN include the OAN of the Broads part or exclude? Suggest this needs to be clear. We did raise this at the first consultation stage.

Attached documents
Norman Castleton

Section Housing

Comment ID 454

Comment District Wide Strategic Planning Policies: There is far too much housing development in this plan and most of it is wrongly sited on green field sites. This element of the plan calls for high quality design & some affordable housing. Well in this direction things need to improve most of the new housing built up to now is of pretty poor design and does not reflect the character of the area. They could have been built anywhere and they look alien and anonymous. Look at the bungalows on the old site of the Ingate Garage, Beccles which are of poor plain design and all crammed together which indicates they should have been built all together in one great big lump. Of the new social housing built in Lowestoft for example for housing trust operators look very plain of barrack block character and are deteriorating amazingly quickly. In instances where new housing has to be built the area badly needs architects of the calibre of Taylor & Green who built outstandingly designed houses for the Rural District Councils many years ago. They still look great which is more than can be said for the newer private, housing trust and council estates of recent years.

Attached documents
Sandra Bendall

Section  Housing

Comment ID  95

Comment  With the increasing population occupying the new housing stock planned, what provision is being made for NHS services to support them please? Especially with regard to local hospital services and GP services in particular.

Attached documents
South Norfolk District Council Adam Nicholls

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<th>Housing</th>
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**Comment ID**  1593

**Comment**

- In general, South Norfolk Council is pleased that Waveney is planning to meet (and indeed exceed) its OAN and the overall strategy for housing growth is supported.

**Attached documents**
Watts

Section                Housing

Comment ID        256

Comment            The National Planning Policy Framework indicates that local planning authorities must use FUTURE DEMOGRAPHIC AND MIGRATION TRENDS. Has the Strategic Housing Market Assessment definitely done this with due regard to the impact of Brexit on future net migration to the area?

Attached documents
Policy WLP8.1 - Housing Mix

Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.1 - Housing Mix

Comment ID 1441

Comment The fixed costs of building 1 and 2 bedroom properties are the same as those for larger properties. These relate to things such as infrastructure and planning/building regs costs, bond costs of roads and sewers etc and for smaller properties are becoming a disproportionate part of the value calculation. Increasing the percentage of these smaller properties will further reduce land values and may well hinder delivery or lead to further viability discussions around the delivery of affordable housing.

In addition the requirement all be it at 5% for part M4 (2) compliance will add cost. We are sympathetic to the aim of this policy but would point out that whilst this is not difficult to achieve in a 4/5 bed property, applying such criteria to a 2 bed property is likely to increase the floor around to around that of a current 3 bed property with no potential for an increase in the selling price. This again will have a downward impact on land values.

The application of the policy to sites of 20 or more is a sensible move.

Attached documents
**Beccles Society Paul Fletcher**

**Section** Policy WLP8.1 - Housing Mix

**Comment ID** 680

**Comment**
The housing mix specifies that 35% of housing should be affordable, with 50% of these being for affordable rent, 30% shared ownership and 20% starter homes. It is understood that occupants of rented properties will be chosen from applicants who are on a District wide register with a likely preponderance from the Lowestoft area. Much concern has previously been expressed at public meetings and elsewhere about a large influx of people into Beccles who do not contribute to the local economy in a positive way.

When assessing the provision of care homes/nursing homes/sheltered dwellings, we believe that account should be taken of the individual units per dwelling so that when added with all the other houses the total numbers do not exceed the housing allocation allotted for Beccles.

Furthermore we are of the opinion that a greater proportion than 20% should be starter homes for young families.

We are also of the opinion that a mix of detached houses, semi-detached and terraced homes would be more appropriate for the environment of Beccles in relation to the 65% of general housing provision.

**Attached documents**
Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.1 - Housing Mix

Comment ID 1125

Comment Concern is raised to the requirement within Policy WLP8.1 for at least 35% of new residential developments to be 1 or 2 bedroom properties. It is implied that this percentage requirement is separate to the amount of affordable housing provision the Council requires but the policy provides no other assistance to the plan user as to what approach should be taken to developments of varying scales.

This is not considered to be a realistic target for all new residential developments as it does not consider the impact that viability has upon small developments such as the schemes on proposed allocated sites WLP7.9 'Land North of Chapel Road' and WLP7.10 'Land West of London Road' in Wrentham. Furthermore, the supporting Draft Sustainability Appraisal has considered the likely impacts to be at the cost of family homes and mixed balanced communities and the Council needs to make a judgement as to whether the delivery of this policy would be beneficial. Further guidance is required from the Council to clarify whether this policy is to be considered in conjunction, or separate to Policy 8.2 for 'Affordable Housing'.

In regards to Requirement M4 (2) of Part M of the Building Regulations for accessible and adaptable dwellings, we welcome and support the Council’s aim to encourage more housing development suitable for the needs of 40% of districts population who care or live with a disabled resident.

Attached documents
Bungay Neighbourhood Development Plan Steering Group Ken Lodge

Section Policy WLP8.1 - Housing Mix

Comment ID 1523

Comment A mix of housing types is necessary, specifically small houses, starter homes, social housing, easy access housing and sheltered housing. Larger homes are also required to maintain a balance of accommodation and of income spread.

Attached documents
Bungay Town Council P Morrow

Section  Policy WLP8.1 - Housing Mix

Comment ID  1547

Comment  Housing should consist of a varied mix. Housing should be environmentally fit for its lifetime.

Attached documents
Carol & Mark Fisher

Section: Policy WLP8.1 - Housing Mix

Comment ID: 155

Comment: We need smaller retirement properties such as the bungalows in the bottom part of Queen Elizabeth Drive. This then would free up larger properties in the town for families.
Flagship Group -
Jenny Mayne

Section Policy WLP8.1 - Housing Mix

Comment ID 1313

Comment We note and agree with the conclusions in 8.5. relating to the need for smaller units.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.1 - Housing Mix

Comment ID 959

Comment Gladman note the intention in policy WLP2 to shape the housing mix of individual sites in line with the SHMA. The assessment of housing mix within the SHMA represents a fixed point in time and it would therefore be unreasonable to apply this over the plan period through a specific policy mechanism. The housing mix on individual site should be determined on a case by case basis according to market conditions to ensure that sites are viable and responsive to particular circumstances associated with them. In addition, Gladman would also wish to raise initial concerns at this stage with regard to the intention to require optional technical standards for new housing development in the absence of robust evidence to justify its introduction. If the Council wishes to adopt these standards they must be fully justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. Care should be taken to ensure that generic arguments are avoided. It is incumbent on the Council to provide a local assessment evidencing the specific case for Waveney which justifies these policy requirements.

Attached documents
Hastoe Housing Association -
Jenny Mayne

Section  
Policy WLP8.1 - Housing Mix

Comment ID  
1317

Comment  
We note and agree with the conclusions in 8.5. relating to the need for smaller units.
Heather Powell

Section Policy WLP8.1 - Housing Mix

Comment ID 282

Comment When building starts, there must be an appropriate mix of housing. There must be genuinely affordable starter homes for youngsters to buy (not rent). There must be small homes for the elderly to downsize into without paying huge service charges. Please speak to Aiden Branch at Durrants on this point!

Attached documents
Home Builders Federation Mark Behrendt

Section Policy WLP8.1 - Housing Mix

Comment ID 902

Comment Optional building standards

The Council have set out in both policy WLP8.1 and WLP8.28 its intention to apply the optional building standards for access and water efficiency. Planning Practice Guidance requires evidence on both needs and viability before the optional technical standards for housing are implemented and at present there is insufficient evidence on both needs and viability to justify these standards. Until this is undertaken the Council’s polices on these housing standards cannot be considered sound.
Hopkins Homes Christopher Smith  
Armstrong Rigg Planning (Geoff Armstrong)

Section  
Policy WLP8.1 - Housing Mix

Comment ID  
1466

Comment  
Housing Mix – Object

Policy WLP8.1 states that the mix of sizes and types of units on any particular site should be based on evidence of local needs including the Strategic Housing Market Assessment and in consultation with the local planning authority. It goes on to state, however, that proposals for new residential developments will be permitted where at least 35% of new dwellings on the site are 1 or 2 bedroom properties. This second element of the policy is considered to be too prescriptive as the precise housing needs of the district will be subject to change over the lifetime of the plan as new evidence becomes available and will also vary across the district as Neighbourhood Plans provide evidence on specific local housing needs. On this basis we consider the most sustainable approach to setting a required housing mix is for it to be based on the most up to date evidence and determined in consultation with the local planning authority.

Attached documents
Ingleton Wood LLP (Iain Hill)

Section Policy WLP8.1 - Housing Mix

Comment ID 977

Comment The Policy advises that proposals for new residential development will be permitted where 35% of new dwellings comprise one or two bedroom properties. Whilst it is recognized that this is in accordance with the Council’s Strategic Housing Market Assessment (2017), the Policy should provide a degree of flexibility to allow it to respond to changing circumstances. More specifically, it is requested that the Policy should advise that the Council will seek that developments provide 35% one and two bedroom properties, unless developers and landowners can provide evidence to demonstrate that an alternative mix should be provided. This will ensure a consistent approach with the supporting text to the Policy, notably Paragraph 8.6, which states that:

"needs can change and vary from site to site as local requirements change. There also maybe a particular market demand for certain types of property in a specific location. Therefore, some flexibility is required."

Attached documents
Ingleton Wood LLP Iain Hill
Ingleton Wood LLP (Iain Hill)

Section Policy WLP8.1 - Housing Mix

Comment ID 978

Comment
The Policy advises that proposals for new residential development will be permitted where 35% of new dwellings comprise one or two bedroom properties. Whilst it is recognized that this is in accordance with the Council’s Strategic Housing Market Assessment (2017), the Policy should provide a degree of flexibility to allow it to respond to changing circumstances. More specifically, it is requested that the Policy should advise that the Council will seek that developments provide 35% one and two bedroom properties, unless developers and landowners can provide evidence to demonstrate that an alternative mix should be provided. This will ensure a consistent approach with the supporting text to the Policy, notably Paragraph 8.6, which states that:

"needs can change and vary from site to site as local requirements change. There also maybe a particular market demand for certain types of property in a specific location. Therefore, some flexibility is required."

Attached documents
John Lavery

Section | Policy WLP8.1 - Housing Mix

Comment ID | 337

Comment | The overall proposed housing mix needs to be strictly controlled. There are already far too many 'Executive' style 3 & 4 bedroom houses which are actually depressing the existing market for older versions. Many 3-4 bedroom properties in the area have experienced zero price rises while yet more of these houses are flooding the market. As already stated affordable modest family homes and smaller places for those whose families have grown up and moved out are what's needed. This will in itself release more 3-4 bedroom properties onto the market, further reducing the need for new builds.

Attached documents
Mr and Mrs Goaman

Section Policy WLP8.1 - Housing Mix

Comment ID 355

Comment Need for more bungalows in area for older people downsizing.

Attached documents
**Orbit Homes**  
**Jenny Mayne**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.1 - Housing Mix</th>
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<tr>
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<td>1322</td>
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<tr>
<td>Comment</td>
<td>We note and agree with the conclusions in 8.5. relating to the need for smaller units.</td>
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</tbody>
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**Attached documents**
Orwell Housing Association  -  
Jenny Mayne

Section  
Policy WLP8.1 - Housing Mix

Comment ID  
1331

Comment  
We note and agree with the conclusions in 8.5. relating to the need for smaller units.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.1 - Housing Mix

Comment ID 1224

Comment 4.1 Housing Mix (Policy WLP 8.1)
We strongly agree that the mix of size and types should reflect local need but generally 35% of new dwellings should be 1 or 2 bedroom properties and (in developments of more than 20 dwellings) 5% should be accessible or able to be converted to accessible for people with disabilities. In Southwold and Reydon, we would like to see, in addition, up to 30% of houses to be 2 or 3 bedroom properties to keep down the price of market housing and to discourage pastiche "executive" style development.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

<table>
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<tr>
<th>Section</th>
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<tr>
<td>Comment ID</td>
<td>1329</td>
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Policy WLP8.1 Housing Mix puts forward a requirement for all new residential developments to have at least 35% of new dwellings to be 1 or 2 bedroomed properties. The supporting text to this policy indicates that this requirement is derived from the District Council’s recently adopted SHMA (July 2017), and it suggests a degree of flexibility needs to be applied as 'needs can change and vary from site to site as local circumstances change' (para 8.6). Whilst we would agree with the wording within the supporting text we believe that the flexibility advocated needs to be embodied in the wording of the actual policy itself.

Attached documents
Saffron Housing Trust -
Jenny Mayne

Section  
Policy WLP8.1 - Housing Mix

Comment ID  1341

Comment  
We note and agree with the conclusions in 8.5. relating to the need for smaller units.

Attached documents
Simon Phillips

Section Policy WLP8.1 - Housing Mix

Comment ID 1058

Comment I strongly support WLP8.1

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section: Policy WLP8.1 - Housing Mix

Comment ID: 1002

Comment: Draft Policy WLP8.1 Housing Mix

4.1 The Somerleyton Estate object to the policy as currently worded and requests an amendment to the provision within draft policy WLP8.1 that currently states:

"Neighbourhood Plans can set out a different approach to housing type and mix which reflects local circumstances"

4.2 We request that it is replaced with the following text (new content highlighted in bold):

"Neighbourhood Plans or where relevant Design Briefs in the form of Supplementary Planning Documents can set out a different approach to housing type and mix which reflects local circumstances"

4.3 For clarity policy WLP8.1 should set out the circumstances in which the LPA anticipates that an SPD would be developed in preference to the neighbourhood plan if it appeared that the Somerleyton neighbourhood plan was not advancing. The additional text would allow for circumstances where neighbourhood plans do not progress fast enough to meet the development delivery timescales or are abandoned and would allow the local planning authority, through the SPD, to further develop schemes in response to a specific local context.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.1 - Housing Mix

Comment ID 1594

Comment • Policy WLP8.1 – Housing Mix. South Norfolk Council is broadly supportive of the proposed housing mix policy as it reflects the recommendations of the 2017 Strategic Housing Market Assessment.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.1 - Housing Mix

Comment ID 1178

Comment We strongly agree that the mix of size and types should reflect local need but generally 35% of new dwellings should be 1 or 2 bedroom properties and (in developments of more than 20 dwellings) 5% should be accessible or able to be converted to accessible for people with disabilities. In Southwold and Reydon, we would like to see, in addition, up to 30% of houses to be 2 or 3 bedroom properties to keep down the price of market housing and to discourage pastiche "executive" style development.

Attached documents
**Southwold Town Council Lesley Beevor**

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<tr>
<td>Comment ID</td>
<td>1563</td>
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| **Comment** | The Local Plan provides that parishes may specify, within a Neighbourhood Plan, the need for a proportion of housing to be 1-2 beds, to accommodate smaller family units. It should, also, specify that NPs can consider principal residence restrictions on a new-build.  
In addition, range of tenure should be defined, to include occupation by principal residents only. |

**Attached documents**
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Policy WLP8.1 - Housing Mix

Comment ID 1138

Comment
We would strongly support Policy WLP8.1 & 8.2 in Halesworth. However experience in Halesworth has shown that WDC Planning Committees acquiesce to developers pressure to dilute these policies in favour of weaker social contribution, certainly to the detriment to the local community.

Attached documents
Tim Basey-Fisher

Section Policy WLP8.1 - Housing Mix

Comment ID 778

Comment The policy seeks to require at least 35% of new dwellings to be 1 or 2 bedroom properties. Whilst it may be appropriate for the Local Plan to seek to control the size of Affordable Housing on new sites, it should not seek to apply the same restrictions to new Market Housing. This should be left to the market to decide, particularly as the Local Plan has almost a 20 year plan period and housing needs are bound to change over this period.

Similarly whilst it may be appropriate for the Local Plan to require a certain number of dwellings to meet 'optional' building regulation requirements on Affordable Housing, it should not make the same requirements of market housing. Again, this should be for developers to decide in response to the housing market.

Required Change

Amend the Policy to confirm that the bedroom size and optional building regulations requirements apply to only Affordable Housing.

Attached documents
Policy WLP8.2 - Affordable Housing

Anne Bertram

Section Policy WLP8.2 - Affordable Housing

Comment ID 201

Comment [Beccles] What about social housing provision – desperate need for people unable to afford to buy or rent privately.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.2 - Affordable Housing

Comment ID 1442

Comment With regard to the issue of affordable housing we can see no definition for each of the tenure types identified in the policy. For the avoidance of doubt we think that these terms need more clarity.

Attached documents
Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section

Policy WLP8.2 - Affordable Housing

Comment ID

1126

Comment

Support is given to Policy WLP8.2 as the proposed policy wording and supporting paragraphs acknowledge the need to provide new housing for those who would otherwise be unable to access open market housing. It is considered that the proposed affordable housing target of 35% is justified and supported by the evidence base. Furthermore, the proposed threshold of 11 dwelling is also considered as having regard to viability considerations.

We welcome the proactive approach taken by the Council in considering the inclusion of Starter Homes within the affordable housing target in accordance with the suggested amendment to the NPPF made in both the Housing and Planning Act 2016 and recently published Housing White Paper (February, 2017).

Support is given to the proposed ratio of affordable housing and the following statement within the policy in particular: "..Of these affordable dwellings, 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes".

Attached documents
## Broads Authority Natalie Beal

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.2 - Affordable Housing</th>
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<tr>
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<td>472</td>
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<tr>
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<td>8.18 – Affordable housing should be preferably be provided.</td>
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Attached documents
Flagship Group -
Jenny Mayne

Section  Policy WLP8.2 - Affordable Housing

Comment ID  1314

Comment  Our view is that the heading immediately before 8.11 should be changed to "Affordable Housing – including homes for rent and low cost home ownership". The reference to starter homes should be deleted. The government has not produced details on how starter homes would work; there is no guarantee that lenders will offer mortgages on them. Therefore our view is that any target specific to starter homes risks being unachievable. Rather, the Local Plan should use a more generic term i.e. "low cost home ownership" that encompasses a range of products including shared ownership, shared equity, discounted market sales, rent to buy and starter homes.

Attached documents
Flagship Group - Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1315

Comment We agree with the overall requirement to provide 35% affordable housing on sites over 11.

We suggest that the proposed tenure split of the affordable housing is imbalanced – the consultation paper proposes 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes.

Until 1 April 2017 Waveney have asked developers to provide 100% of the affordable units as rented units and we are aware of the reasons behind this (relative need). We note that Para 4.17 of the recent White paper states - "we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units". We therefore recognise why the position has to be changed, but would suggest that the split should be as 70% affordable rent and 30% low cost home ownership, which would comply with NPPF requirements, and be at levels similar to other local authorities across East Anglia. We are aware that if any issues with development economics and viability occur on sites, appropriate mechanisms to deal with these exist.

In the current Local Plan, there is provision for some flexibility on the council's part, to modify targets to ensure that policies remain valid – we would suggest the following caveat is likewise included in this Local Plan " These targets will be monitored and may be modified to take into account up to date housing information through the plan period"

We are wary of including the following proposed wording in the draft document "Sheltered and extra-care housing should be included as affordable units where practicable".

There is currently no revenue funding available for new sheltered housing schemes – any funding for low level housing support is linked to an
individual rather than a property (and is therefore tenure neutral).

Revenue funding specifically tied to new extra care schemes from Social Care budgets is equally unlikely to be forthcoming in the foreseeable future. As Registered Providers we are not currently considering any such projects in Waveney due to revenue risks. We recognise the demographic trends, however we suggest this is better dealt with through providing a range of affordable accommodation that is built to adequate standards and is fit for purposes for an ageing population – on the basis that support and care services are provided in line with needs rather than being strictly tied to the property.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section                          Policy WLP8.2 - Affordable Housing

Comment ID                      960

Comment                         Gladman note the intention in policy WLP2 to shape the housing mix of individual sites in line with the SHMA. The assessment of housing mix within the SHMA represents a fixed point in time and it would therefore be unreasonable to apply this over the plan period through a specific policy mechanism. The housing mix on individual site should be determined on a case by case basis according to market conditions to ensure that sites are viable and responsive to particular circumstances associated with them. In addition, Gladman would also wish to raise initial concerns at this stage with regard to the intention to require optional technical standards for new housing development in the absence of robust evidence to justify its introduction. If the Council wishes to adopt these standards they must be fully justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. Care should be taken to ensure that generic arguments are avoided. It is incumbent on the Council to provide a local assessment evidencing the specific case for Waveney which justifies these policy requirements.

It is noted that the affordable housing policy is not yet supported by the proportionate evidence necessary to justify the level of affordable housing of 35% that has been proposed (Local Plan First Draft, Paragraph 8.14). At this stage, this proposal would appear to be pre-determined and in the preparation of the next iteration of the Local Plan it is essential that a range of options are tested for the delivery of affordable housing. Furthermore, as part of this, careful consideration should be given to the likely scale of delivery of affordable housing from the suite of allocations that are proposed with a view to setting a strategy that will enable affordable needs to be met in full over the plan period.

In addition, additional flexibility will be required within the policy in terms of the proposed tenure split and affordable housing requirement so that the Plan is flexible to any site-by-site requirements and responsive to any changes to the definition of affordable housing.
Attached documents
### Glenys Westmacott

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<thead>
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<td>164</td>
</tr>
<tr>
<td>Comment</td>
<td>How many houses allocated to social housing for local people?</td>
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**Attached documents**
Hastoe Housing Association -
Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1318

Comment Our view is that the heading immediately before 8.11 should be changed to "Affordable Housing – including homes for rent and low cost home ownership". The reference to starter homes should be deleted. The government has not produced details on how starter homes would work; there is no guarantee that lenders will offer mortgages on them. Therefore our view is that any target specific to starter homes risks being unachievable. Rather, the Local Plan should use a more generic term i.e. "low cost home ownership" that encompasses a range of products including shared ownership, shared equity, discounted market sales, rent to buy and starter homes.

Attached documents
Hastoe Housing Association -
Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1319

Comment We agree with the overall requirement to provide 35% affordable housing on sites over 11.

We suggest that the proposed tenure split of the affordable housing is imbalanced – the consultation paper proposes 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes.

Until 1 April 2017 Waveney have asked developers to provide 100% of the affordable units as rented units and we are aware of the reasons behind this (relative need). We note that Para 4.17 of the recent White paper states - "we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units". We therefore recognise why the position has to be changed, but would suggest that the split should be as 70% affordable rent and 30% low cost home ownership, which would comply with NPPF requirements, and be at levels similar to other local authorities across East Anglia. We are aware that if any issues with development economics and viability occur on sites, appropriate mechanisms to deal with these exist.

In the current Local Plan, there is provision for some flexibility on the council’s part, to modify targets to ensure that policies remain valid – we would suggest the following caveat is likewise included in this Local Plan " These targets will be monitored and may be modified to take into account up to date housing information through the plan period"

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Revenue funding specifically tied to new extra care schemes from Social Care budgets is equally unlikely to be forthcoming in the foreseeable future. As Registered Providers we are not currently considering any such projects in Waveney due to revenue risks. We recognise the demographic trends, however we suggest this is better dealt with through providing a range of affordable accommodation that is built to adequate standards and is fit for purposes for an ageing population – on the basis that support and care services are provided in line with needs rather than being strictly tied to the property.

Attached documents
Home Builders Federation Mark Behrendt

Section Policy WLP8.2 - Affordable Housing

Comment ID 901

Comment Policy WLP8.2 Affordable Housing

As there is no viability evidence published alongside the plan we cannot comment on the appropriateness of the proportion of affordable housing that is expected on appropriate sites. However, whilst we appreciate that the Council has recognised that the affordable housing contributions may impact on the viability of some development it is important that this is set out in policy not just the supporting text. We would suggest that at the end of the first sentence of this policy the words "where viable" are inserted.

Attached documents
Section Policy WLP8.2 - Affordable Housing

Comment ID 979

Comment The requirement within the Policy that the tenure of affordable housing should be split 50% (affordable rent), 30% (shared ownership), 20% (starter homes) is supported given that it reflects the Strategic Housing Market Assessment (2017) prepared by the Council. The mix will help ensure the provision of sustainable developments which satisfy local need. In addition, the flexibility incorporated into the draft policy through recognition that both the tenure of affordable housing and the percentage of affordable housing can be varied, subject to the provision of suitable financial viability information, is supported. The flexibility will ensure that developments are viable, therefore, increasing the chance of housing being delivered.

Attached documents
Laura Lovelace

Section Policy WLP8.2 - Affordable Housing

Comment ID 91

Comment With all new builds now I understand a certain amount of social housing has to be built, however I strongly disagree with social housing being on any green belt land, it should only be of benefit to those paying a lot of money to live in such areas. I feel that all social housing should be grouped together and in no way built next to any homes, worth hundreds of thousands of pounds. I am not a snob I own my own property which is excouncil and live next to antisocial council tenants. Why can't councils and private builders pull together, separating these homes from one another. Many council tenants don't care about their properties, a lot can't even cut their grass, why councils and government think that these homes should be mixed is above me. I would never consider spending 400,000 on a home anywhere near what could be untidy, antisocial council housing I feel all social housing near these homes should be on some sort of register, also all privately owned homes that are rented out privately should also be registered for buyers, all home buying should have protection from neighbours using drugs and of the smell of cannabis in their homes, this information should be part of the legal process of buying. I wouldn't live in a new estate if you paid me now, to get any sort of protection you need to live in older established estates like 1970's People that work to pay for their own homes should benefit from nicer places, nicer people, and I'm not suggesting everyone in council homes aren't nice, I live in one.

Attached documents
McGregor

Section  
Policy WLP8.2 - Affordable Housing

Comment ID  
171

Comment  
Are there any assurances that social housing will be for local people or will we be absorbing families that other councils cannot house. This would change the integrity of Beccles.

Attached documents
Orbit Homes -
Jenny Mayne

Section  Policy WLP8.2 - Affordable Housing

Comment ID  1324

Comment  Our view is that the heading immediately before 8.11 should be changed to "Affordable Housing – including homes for rent and low cost home ownership". The reference to starter homes should be deleted. The government has not produced details on how starter homes would work; there is no guarantee that lenders will offer mortgages on them. Therefore our view is that any target specific to starter homes risks being unachievable. Rather, the Local Plan should use a more generic term i.e. "low cost home ownership" that encompasses a range of products including shared ownership, shared equity, discounted market sales, rent to buy and starter homes.

Attached documents
Orbit Homes -
Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1327

Comment We agree with the overall requirement to provide 35% affordable housing on sites over 11.

We suggest that the proposed tenure split of the affordable housing is imbalanced – the consultation paper proposes 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes.

Until 1 April 2017 Waveney have asked developers to provide 100% of the affordable units as rented units and we are aware of the reasons behind this (relative need). We note that Para 4.17 of the recent White paper states - "we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units". We therefore recognise why the position has to be changed, but would suggest that the split should be as 70% affordable rent and 30% low cost home ownership, which would comply with NPPF requirements, and be at levels similar to other local authorities across East Anglia. We are aware that if any issues with development economics and viability occur on sites, appropriate mechanisms to deal with these exist.

In the current Local Plan, there is provision for some flexibility on the council’s part, to modify targets to ensure that policies remain valid – we would suggest the following caveat is likewise included in this Local Plan "These targets will be monitored and may be modified to take into account up to date housing information through the plan period"

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Our view is that the heading immediately before 8.11 should be changed to "Affordable Housing – including homes for rent and low cost home ownership". The reference to starter homes should be deleted. The government has not produced details on how starter homes would work; there is no guarantee that lenders will offer mortgages on them. Therefore our view is that any target specific to starter homes risks being unachievable. Rather, the Local Plan should use a more generic term i.e. "low cost home ownership" that encompasses a range of products including shared ownership, shared equity, discounted market sales, rent to buy and starter homes.
Orwell Housing Association  -  
Jenny Mayne  

Section  Policy WLP8.2 - Affordable Housing  

Comment ID  1336  

Comment  
We agree with the overall requirement to provide 35% affordable housing on sites over 11.

We suggest that the proposed tenure split of the affordable housing is imbalanced – the consultation paper proposes 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes.

Until 1 April 2017 Waveney have asked developers to provide 100% of the affordable units as rented units and we are aware of the reasons behind this (relative need). We note that Para 4.17 of the recent White paper states - "we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units". We therefore recognise why the position has to be changed, but would suggest that the split should be as 70% affordable rent and 30% low cost home ownership, which would comply with NPPF requirements, and be at levels similar to other local authorities across East Anglia. We are aware that if any issues with development economics and viability occur on sites, appropriate mechanisms to deal with these exist.

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Attached documents
Rentplus UK Ltd - Tetlow King Planning (-)

Section Policy WLP8.2 - Affordable Housing

Comment ID 806

Comment We represent Rentplus, a company providing an innovative affordable housing model that delivers affordably rented homes to buy (a 'rent to buy' model) for people who aspire to own their own home, but are currently unable to save for a mortgage deposit.

We have previously responded to the Options consultation held last summer, including an Affordable Housing Statement which provides additional information on the rent to buy model and how we consider its inclusion within local planning policy can assist in meeting local housing needs. It has not been included with this representation, but it is notable that since that consultation response we have submitted responses to the Housing White Paper consultation which included rent to buy within a new proposed definition of affordable housing, and the Housing Minister Alok Sharma has recently confirmed to the House of Commons that it is intended for rent to buy to be included within the next iteration of the NPPF.

Details of completed and forthcoming schemes can be viewed on their website www.rentplus-uk.com, while it is further important to note that Rentplus has delivered a number of rent to buy schemes across England since our last representation. Those schemes have rehomed families previously living in other affordable properties, releasing those for families with greater priority needs, in partnership with the local planning authorities and Registered Providers active in those areas. Rentplus rent to buy homes are allocated through the local choice based lettings scheme and targeted lettings plans, providing homes at an affordable rent for those expecting to purchase in 5, 10, 15 or 20 years, with a 10% gifted deposit to assist purchase.

While the 2017 SHMA has taken into account the new starter homes model, it has not considered those other models and tenures set out within
the Housing White Paper, including rent to buy. As the Government is seeking to widen the definition of affordable housing, and for a wider range of options to be made available to meet aspirations for affordable home ownership, we do not consider it appropriate for the Council to seek to deliver 20% starter homes as part of Policy WLP8.2. This no longer reflects the Government’s intentions and should be amended as part of changes to the emerging plan. We strongly recommend that this part of the policy is amended, removing reference to 20% being provided as starter homes, and instead at least 10% as affordable home ownership models.

We note here that our response to the Housing White Paper earlier this year emphasised that rent to buy is not an intermediate model, but a hybrid that requires separate definition, as with a number of the other models set out in that consultation (at Box 4). Rentplus seeks to bridge the gap left by those affordable housing tenures through which households without a deposit cannot access intermediate housing, but are not eligible or in greatest need for social or affordable rented housing. The rental period in a Rentplus home enables families to build up savings, before purchasing the home outright.

We support the approach taken to seeking to review tenure and type of affordable housing being delivered before seeking to reduce the overall level of affordable housing on individual schemes. This is an appropriate and pragmatic approach that aims to maximise the total level of affordable housing being delivered across Waveney. Policy WLP8.2 should therefore refer to the mix as indicative only, as negotiation on tenure is a key part of securing viable developments. For the policy to fully reflect the Government’s emerging policy position it should include reference to a ‘wide range of affordable housing tenure options, including rent to buy’.

The partnership approach, working with each local planning authority and Registered Providers already active in each area, ensures considerable local knowledge and experience is used in bringing forward each development for local people. We strongly encourage the Council to consider direct discussions between its strategic planning and housing officers and Rentplus, to establish where joint working can deliver additional benefits to the local communities of the District.

We would like to be consulted on further stages of the Plan and other local planning policy publications, by email only to consultation@tetlow-king.co.uk. Please ensure that Rentplus is retained on the consultation database, with Tetlow King Planning listed as their agents.
Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.2 - Affordable Housing

Comment ID 1225

Comment 4.2 Affordable Housing and Starter Homes (Policy WLP8.2)

We strongly agree that developments over 11 dwellings should include 35% affordable, comprising 50% affordable rented, 30% shared ownership and 20% starter homes and that sheltered and extra care housing should be encouraged in the affordable proportion. Where provision on smaller sites is made for commuting this requirement into a cash sum to be paid for affordable housing elsewhere, this sum must represent the full cost of developing affordable housing elsewhere.

The proposed viability assessment must be conducted at local level as the housing market in Southwold and Reydon may be able to sustain a higher proportion of affordable housing than elsewhere in Waveney. Indeed, we would like to see a proportion higher than 35% if this is viable in our area. In addition, it is vital that (a) a local connection allocations policy is applied to all forms of affordable housing and (b) that every step possible is taken to ensure that shared ownership and starter homes remain with that status when re-sold, eg by limits to "staircasing" of equity on shared ownership properties to 75%.

We also believe there should be flexibility to increase the proportion of shared ownership where evidence suggests that this would be a good way of meeting housing need and helping local people stay in/close to their community.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Policy WLP8.2 - Affordable Housing

Comment ID 1330

Comment Policy WLP8.2 Affordable Housing makes reference to all residential development of 11 units or more must make provision for 35% affordable housing. It goes on to identify a split of 50% for affordable rent; 30% shared ownership and 20% starter homes. There is a danger with having an over-prescriptive policy endangering the delivery of housing to the area. Again, we believe that a degree of flexibility may be needed to adjust the level of affordable housing and the type of tenure.

Attached documents
Rosemary Simpson

Section Policy WLP8.2 - Affordable Housing

Comment ID 138

Comment [In relation to sites WLP3.2 and WLP3.1] Can you confirm that the social housing will be houses for local needs and will not be 'shipping in' loads of hard to house people from other areas.

Attached documents
Saffron Housing Trust -
Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1342

Comment Our view is that the heading immediately before 8.11 should be changed to "Affordable Housing – including homes for rent and low cost home ownership". The reference to starter homes should be deleted. The government has not produced details on how starter homes would work; there is no guarantee that lenders will offer mortgages on them. Therefore our view is that any target specific to starter homes risks being unachievable. Rather, the Local Plan should use a more generic term i.e. "low cost home ownership" that encompasses a range of products including shared ownership, shared equity, discounted market sales, rent to buy and starter homes.

Attached documents
Saffron Housing Trust -
Jenny Mayne

Section Policy WLP8.2 - Affordable Housing

Comment ID 1343

Comment We agree with the overall requirement to provide 35% affordable housing on sites over 11.

We suggest that the proposed tenure split of the affordable housing is imbalanced – the consultation paper proposes 50% should be for affordable rent; 30% should be shared ownership; and 20% should be starter homes.

Until 1 April 2017 Waveney have asked developers to provide 100% of the affordable units as rented units and we are aware of the reasons behind this (relative need). We note that Para 4.17 of the recent White paper states - "we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units". We therefore recognise why the position has to be changed, but would suggest that the split should be as 70% affordable rent and 30% low cost home ownership, which would comply with NPPF requirements, and be at levels similar to other local authorities across East Anglia. We are aware that if any issues with development economics and viability occur on sites, appropriate mechanisms to deal with these exist.

In the current Local Plan, there is provision for some flexibility on the council’s part, to modify targets to ensure that policies remain valid – we would suggest the following caveat is likewise included in this Local Plan " These targets will be monitored and may be modified to take into account up to date housing information through the plan period"

We are wary of including the following proposed wording in the draft document "Sheltered and extra-care housing should be included as affordable units where practicable".

There is currently no revenue funding available for new sheltered housing schemes –any funding for low level housing support is linked to an
individual rather than a property (and is therefore tenure neutral).

Revenue funding specifically tied to new extra care schemes from Social Care budgets is equally unlikely to be forthcoming in the foreseeable future. As Registered Providers we are not currently considering any such projects in Waveney due to revenue risks. We recognise the demographic trends, however we suggest this is better dealt with through providing a range of affordable accommodation that is built to adequate standards and is fit for purposes for an ageing population – on the basis that support and care services are provided in line with needs rather than being strictly tied to the property.

Attached documents
<table>
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<tr>
<th>Simon Phillips</th>
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<td><strong>Section</strong></td>
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<td><strong>Comment ID</strong></td>
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</table>
| **Comment**    | I strongly support WLP8.2  
Affordable housing should always be delivered on site - the provision for this not to occur should only be used in the rarest of cases. |

**Attached documents**
South Norfolk District Council Adam Nicholls

Section Policy WLP8.2 - Affordable Housing

Comment ID 1595

Comment • Policy WLP8.2 – Affordable Housing. A completed viability assessment of the plan will be needed to prove that the 35% requirement remains viable. The policy requires that 20% of affordable dwellings should be Starter Homes, but Waveney may wish to consider qualifying this to allow other intermediate tenures if Starter Homes are not deliverable (e.g. if the Government does not produce adequate guidance to define them precisely). The policy also states that 'Sheltered and extra-care housing should be included as affordable units where practicable'. Are the words 'where practicable' precise enough to be enforceable?

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.2 - Affordable Housing

Comment ID 1179

Comment We strongly agree that developments over 11 dwellings should include 35% affordable, comprising 50% affordable rented, 30% shared ownership and 20% starter homes and that sheltered and extra care housing should be encouraged in the affordable proportion. Where provision on smaller sites is made for commuting this requirement into a cash sum to be paid for affordable housing elsewhere, this sum must represent the full cost of developing affordable housing elsewhere.

The proposed viability assessment must be conducted at local level as the housing market in Southwold and Reydon may be able to sustain a higher proportion of affordable housing than elsewhere in Waveney. Indeed, we would like to see a proportion higher than 35% if this is viable in our area. In addition, it is vital that (a) a local connection allocations policy is applied to all forms of affordable housing and (b) that every step possible is taken to ensure that shared ownership and starter homes remain with that status when re-sold, eg by limits to "staircasing" of equity on shared ownership properties to 75%.

We also believe there should be flexibility to increase the proportion of shared ownership where evidence suggests that this would be a good way of meeting housing need and helping local people stay in/close to their community.

Attached documents
Southwold Town Council Lesley Beevor

Section Policy WLP8.2 - Affordable Housing

Comment ID 1564

Comment By the end of the 1970s, Southwold Borough Council and subsequently WDC, had built in the region of 160 affordable dwellings in Southwold. There are now fewer than 90. Since only small sites are available for development in Southwold, the Local Plan should provide that NPs can alter the commutation rules, in order to make provision for local circumstances. This would mean that developers in Southwold would be encouraged to build affordable housing.

In addition, on viability, developers in Southwold will pay high prices for land and the argue it is not viable to deliver affordable housing. The LPA should do everything within its somewhat limited powers in this regard, to prevent such scenarios.

The Local Plan appears to allow NPs to set higher percentages (above 35%) for affordable housing delivered by private developers. The note here is for the SNPT to look at this provision.

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Policy WLP8.2 - Affordable Housing

Comment ID 1139

Comment We would strongly support Policy WLP8.1 & 8.2 in Halesworth.

However experience in Halesworth has shown that WDC Planning Committees acquiesce to developers pressure to dilute these policies in favour of weaker social contribution, certainly to the detriment to the local community.
Tim Basey-Fisher

Section Policy WLP8.2 - Affordable Housing

Comment ID 779

Comment

The Policy requires 35% of new housing on sites of 11 dwellings or more to be Affordable Housing. However, the Local Plan is not supported by an up to date Viability Assessment. The Viability Assessment needs to be undertaken using a recognised methodology and using up to date inputs and agreed assumptions. It should not be done by the Council in isolation and requires input from local developers.

Local experience would suggest that such high levels of affordable housing is not likely viable throughout the Plan period. In the interim, the Council should present its current evidence that it believes the 35% is viable.

Required Change:

Ensure the Policy is supported by up-to-date and robust Viability information and includes provision for the amount and tenure of Affordable Housing to be reduced to ensure scheme viability.

Attached documents
Policy WLP8.3 - Self Build and Custom Build

Badger Building (E.Anglia)Ltd Edward Gilder

Section  Policy WLP8.3 - Self Build and Custom Build

Comment ID  1443

Comment  We have already expressed concern at the consultation meeting about the wording of this policy. The 12 months after completion time cut off is not practical. For a developer to return to a site after twelve months or more to pick up and develop any undeveloped plots, is not a viable proposition. Site compounds have to be re-established and workers relocated to what will be small sites. In addition those people resident on the recently completed section of the development will not welcome the return of activity. These site should be offered for sale at the outset of development for a period of twelve months and if not taken up in that time can then be completed by the developer as part of the normal build programme. If demand is as strong as government would have us believe then there should be no problem with this proposed time scale.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.3 - Self Build and Custom Build

Comment ID 961

Comment The proposed introduction of a blanket requirement for custom / self-build plots should be fully justified through an assessment of housing needs, so that it appropriately reflects local circumstances in relation to the need and demand for self-build and custom build housing. In addition, any such requirements should be fully reflected in the Council’s housing trajectory in terms of the impact that any delayed delivery of such plots may have on overall supply. Gladman are concerned that the policy wording in relation to custom / self-build is not sufficiently responsive to circumstances that will arise on a site by site basis and request that this is addressed through revised drafting to ensure that housing delivery is not delayed in circumstances where there is no demonstrable demand for these products. In addition, we request that the policy and supporting text makes it clear that the Council is 'seeking to encourage' the inclusion of self-build and custom build on large housing sites rather than 'requiring it'.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Policy WLP8.3 - Self Build and Custom Build

Comment ID 1332

Comment Policy WLP8.3 Self Build and Custom Build seeks a minimum of 5% self or custom build as part of any development over 100 units. Whilst self-build does have a role to play in housing delivery, it is our opinion that there should not be a blanket application of this policy on all schemes over 100 units in size; particularly when a scheme forms part of a wider mixed-use development proposal where deliverability is absolutely critical.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.3 - Self Build and Custom Build

Comment ID 1596

Comment • Policy WLP8.3 – Self Build and Custom Build. South Norfolk Council supports this policy, in particular the need for developments of 100 or more dwellings to provide a minimum of 5% self or custom build properties and the requirement for proposals of 5 or more self-build/custom build dwellings to be developed in accordance with a set of agreed design principles.

Attached documents
Policy WLP8.4 - Conversion of Properties to Flats

Paul King

Section Policy WLP8.4 - Conversion of Properties to Flats

Comment ID 693

Comment I fully support Policy WLP8.4 in the First draft plan. It is vital for the reasons stated in the draft plan that "Flat saturation zones" exist and No further conversions are permitted within the said zones.
Policy WLP8.5 - Gypsy and Traveller Sites

Amanda Frost

Section: Policy WLP8.5 - Gypsy and Traveller Sites

Comment ID: 576

Comment: I live in a house overlooking the Belvedere Road Car Park and have no problem at all with the Travelling Show people being allowed to stay on the car park whilst they are operating the fair on Royal Green because they cause no trouble, are respectful of the neighbouring properties and do not dump any rubbish. However the same cannot be said for the illegal encampments we get here from time to time, usually at least twice a year.

Attached documents
Broads Authority Natalie Beal

Section Policy WLP8.5 - Gypsy and Traveller Sites

Comment ID 473

Comment Page 191, Policy WLP8.5 – Gypsy and Traveller Sites. Would welcome reference to impact on landscape character in this policy please.

Attached documents
WHERE PLANNING IS GIVEN TO A SITE THAT IS SINGLE OCCUPANCY AND ONE STATIC CARAVAN, ONE MOBILE CARAVAN AND A UTILITY BLOCK THIS SHOULD BE MONITORED AND Managed BY THE DISTRICT COUNCIL AND PLANNING OFFICE APPROPRIATELY AND NOT LEFT TO THE LOCAL COMMUNITY. IT SHOULD NOT BE ALLOWED TO DEVELOP INTO A SITE THAT CONTAINS 5 MOBILE HOMES PLUS 5/6 CARAVANS AND A UTILITY BLOCK THAT LOOKS LIKE A BUNGALOW!

LIVING ON SITE SHOULD NOT BE ALLOWED UNTIL APPROPRIATE SEWAGE, WASTE AND OTHER FACILITIES HAVE BEEN PROPERLY INSTALLED. THIS WOULD THEN ENABLE BETTER RELATIONSHIPS BETWEEN COMMUNITIES AND TRAVELLERS/GYPSYS AND STOP HUMAN WASTE ETC BEING LEFT ON NEIGHBOURING LANDS.
Environment Agency

Section Policy WLP8.5 - Gypsy and Traveller Sites

Comment ID 879

Comment We would support the policy to site new accommodation for Gypsies and travellers away from flood zones 2 and 3, as it can be difficult to keep such sites safe during flood events.

Attached documents
**Norman Castleton**

**Section**  
Policy WLP8.5 - Gypsy and Traveller Sites

**Comment ID**  
430

**Comment**  
Gypsy and Traveller Sites: We have seen recently in this area of Norfolk & Suffolk how the Gypsy & Traveller communities think they are above the law. Unfortunately, they cause problems wherever they decide to set down and become non-travellers. Therefore, until these travellers reform themselves I would suggest a policy of zero tolerance is adopted to avoid adverse effect on businesses, farms and conventional population areas.

**Attached documents**
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Policy WLP8.5 - Gypsy and Traveller Sites

Comment ID 812

Comment An additional policy line within WLP8.5 is required to address the Suffolk Coast & Heaths AONB - i.e. add to bullet point 5 - no adverse impact on landscape character and quality.

Attached documents
Policy WLP8.6 - Affordable Housing in the Countryside

Badger Building (E.Anglia)Ltd Edward Gilder

Section  | Policy WLP8.6 - Affordable Housing in the Countryside
Comment ID  | 1444
Comment  | We support this policy.

Attached documents
Becky Taylor

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 47

Comment I particularly welcome the inclusion in 8.37 of the provision for 'self-built cooperatives providing it is secured as affordable housing in perpetuity' within the District. This is a progressive and useful approach which potentially enables the emergence of grassroots socially and environmentally responsible housing solutions. Given the very real challenges facing affordable housing provision in rural areas encouraging such initiatives makes the District's long-term housing strategy both more diverse and more robust.

Attached documents
Broads Authority Natalie Beal

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 474

Comment Page 103, Policy WLP8.6 – Affordable Housing in the Countryside. Second bullet point; what about sites next to towns like Beccles, Bungay and Lowestoft as the current policy refers to villages only? Last bullet point; not just the setting of the settlement, but other landscape impacts of the development could be weaved into this – the development could impact on the landscape character of the area in general.

Attached documents
**Flagship Group**  
*Jenny Mayne*

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<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.6 - Affordable Housing in the Countryside</th>
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<tr>
<td>Comment ID</td>
<td>1316</td>
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<tr>
<td>Comment</td>
<td>We support this policy; it's very comprehensive and will help to maintain landowners expectations whilst enabling private homes to ensure viability of rural sites.</td>
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**Attached documents**
Hastoe Housing Association -
Jenny Mayne

Section  Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID  1320

Comment  We support this policy; it's very comprehensive and will help to maintain landowners expectations whilst enabling private homes to ensure viability of rural sites.

Attached documents
**Orbit Homes**

*Jenny Mayne*

**Section**  
Policy WLP8.6 - Affordable Housing in the Countryside

**Comment ID**  
1328

**Comment**  
We support this policy; it's very comprehensive and will help to maintain landowners expectations whilst enabling private homes to ensure viability of rural sites

**Attached documents**
Orwell Housing Association -
Jenny Mayne

Section  Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID  1338

Comment  We support this policy; it’s very comprehensive and will help to maintain landowners expectations whilst enabling private homes to ensure viability of rural sites.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 1226

Comment 4.3 Affordable Housing in the Countryside (Policy WLP8.6)

This allows for development of sites in the countryside adjacent to Larger Villages, Smaller Villages and hamlets where identified housing need cannot be met by allocations in the Local Plan or a Neighbourhood Plan. However, as Reydon and Southwold are counted as one area in the Local Plan, neither meet the definition of Larger Village – so the policy will not apply. Clearly, in the short term, the developments at Duncans Yard, Green Lane, St Felix (possibly) and Copperwheat Ave (longer term) will add significantly to the supply of affordable housing in our community.

However, we believe that Reydon should be included in the policy so that if, in the later years of the plan, there is evidence of housing need that is not being met, further sites on the boundary of the settlement could be developed.

Attached documents
Richard Jackson

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 76

Comment I wholeheartedly support paragraph 8.37. This paragraph recognises the opportunity for low-impact self-build housing co-operatives to contribute affordable housing in rural areas in a way that neither damages local character nor the global environment. This kind of development can also foster rural economic activity and contribute to local community resilience.

Attached documents
Saffron Housing Trust

- Jenny Mayne

**Section**

Policy WLP8.6 - Affordable Housing in the Countryside

**Comment ID**

1344

**Comment**

We support this policy; it's very comprehensive and will help to maintain landowners expectations whilst enabling private homes to ensure viability of rural sites.

**Attached documents**
Sally Anfilogoff

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 752

Comment Chapter 8 District-Wide Strategic Planning Policies

Your draft plan states;

8.3 The Local Plan allocates a significant amount of land to accommodate new housing development, in excess of the objectively assessed need identified above. The overall strategy for the District therefore focusses new housing delivery on allocated sites and windfall sites within the Settlement Boundaries of Lowestoft, the market towns, larger and smaller villages. (See Policies WLP1.1, WLP1.2 and WLP1.3). However, in order to deliver more affordable housing and other types of small scale housing in the Countryside (i.e. outside of Settlement Boundaries),

Policies WLP8.6, WLP8.7, WLP8.8 and WLP8.11 in this section allow for a small number of exceptions to this approach.

But you fail to make suggestions as to what exceptions might be made. It is improper to suggest that residents should approve such a wide ranging statement. You must provide some examples for residents to consider.

Attached documents
Simon Phillips

Section: Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID: 1060

Comment: I support WLP8.6

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.6 - Affordable Housing in the Countryside

Comment ID 1180

Comment This allows for development of sites in the countryside adjacent to Larger Villages, Smaller Villages and hamlets where identified housing need cannot be met by allocations in the Local Plan or a Neighbourhood Plan. However, as Reydon and Southwold are counted as one area in the Local Plan, neither meet the definition of Larger Village – so the policy will not apply here.

Clearly, in the short term, the developments at Duncans Yard, Green Lane, St Felix (possibly) and Copperwheat Ave (longer term) will add significantly to the supply of affordable housing in our community.

However, we believe that Reydon should be included in the policy so that if, in the later years of the plan, there is evidence of housing need that is not being met, further sites on the boundary of the settlement could be developed.

Attached documents
Policy WLP8.7 - Small Scale Residential Development in the Countryside

Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 1445

Comment We have some reservations about the wording of this policy and how this might impact on the delivery of smaller and more affordable homes in villages.

Presently this policy relies on dwelling numbers to define quantity and could for example accommodate 3 larger detached dwellings in a space as defined by your criteria. By using dwelling numbers to limit development, you effectively rule out the possibility of constructing perhaps 6 terraced or semi-detached properties in the same space, which could provide more appropriate dwellings for a village. It might be worth exploring a floor area criteria here where for example a larger detached house might have a footprint of 75 sq m with a double garage of say 40 sq m – you could allow any number of smaller dwellings of no more that the total floor area of the larger dwelling.

We would be happy to discuss with you just how this might be formulated to become an effective policy and one which perhaps might incentivise the delivery of smaller properties.

We note that such development must have local support. We are wary of this and are pleased to see reference specifically to "planning concerns" of the local community – these must be genuine planning concerns and not "alleged concerns" dressed up to hide nimbyism.

Attached documents
Broads Authority Natalie Beal

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 475

Comment Page 196, Policy WLP8.7 – Small Scale Residential Development in the Countryside. Last part of the policy. Not just the setting of the settlement, but other landscape impacts of the development could be weaved into this – the development could impact on the landscape character of the area in general.

Attached documents
Gladman Developments Limited Richard Crosthwaite

**Section**  
Policy WLP8.7 - Small Scale Residential Development in the Countryside

**Comment ID**  
962

**Comment**  
The proposed approach to allow for only small scale development of three or five dwellings in particular circumstances is considered to be an arbitrary restriction that has not been adequately justified. Local Plans should provide a positive strategy that enables sustainable development to come forward without delay and it is highly likely that appropriate forms of development can be brought forward in a sustainable manner during the plan period that exceed the limits that are proposed within this Policy. There are likely to be a number of sustainable development opportunities outside of the tightly drawn settlement boundaries that are well related to settlements and the services and facilities that they provide. Furthermore, such development opportunities can often provide the ability to enhance the sustainability of settlements by enabling new or improved community infrastructure or supporting existing infrastructure that may otherwise cease to operate.

Furthermore, Gladman acknowledge that local communities and parish councils are important stakeholders in the planning process and that it is essential for their views are sought on proposals that may affect their area. Indeed, it is essential that any such views are thoroughly considered by developers preparing proposals and by the local planning authority alongside those of other relevant organisations and individuals when considering and determining planning applications. Notwithstanding this, the Framework does not require local communities to provide support to development proposals and it is therefore essential that any such policy reverts to an approach that reflects the need for the local planning authority to consider the views of all consultees and make it clear that any such support or objection will be considered through a balancing exercise as part of the Council’s decision making process.

Similarly, the approximate percentage split between different settlements within the hierarchy (within policies WLP1.1 and WLPP7.1) should not be used as an arbitrary tool to prevent sustainable development proposals
from coming forward. It is therefore considered inappropriate to include criteria that could result in the rigid application of the spatial distribution percentages that have been proposed.

Attached documents
S Read
Marrons Planning (Jenny Keen)

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 1497

Comment With regards to proposed policy WLP8.7 and the supporting text, it is noted that figure 31 alongside paragraphs 8.40 - 8.41 sets out examples of when development considered by the approach taken in proposed policy WLP8.7 might be permitted. We consider this is a very "black and white" method of assessing development and rather the approach to be taken should consider the merits of each development site and associated proposals in the round as material considerations and the approach should not be to primarily rely on the location of sites as the only determining factor.

Also, whilst we wholly support the concept in paragraphs 8.42 – 8.43 that local support should be sought prior to submitting planning applications, the strength of local support should not be the only factor in deciding whether planning permission can be granted or not for sites of 5 dwellings or more/on the edge of settlements.

Consequently, in assessing proposed policy WLP8.7, whilst we largely support the policy, we submit that the wording should be revisited to provide the flexibility required for sites and proposals to be considered on their individual merits as the determining material considerations. The NPPF is clear that in drawing up Local Plans, Local Planning Authorities should positively seek opportunities to meet development needs and should also provide flexibility to adapt to change (para 14). Therefore the wording of policy WLP8.7 should allow for a more flexible and positive approach to assessing proposals than that currently drafted. This flexible approach would be more consistent with the overarching aims of national planning policy.
Sally Anfilogoff

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 753

Comment Chapter 8 District-Wide Strategic Planning Policies

Your draft plan states;

8.3 The Local Plan allocates a significant amount of land to accommodate new housing development, in excess of the objectively assessed need identified above. The overall strategy for the District therefore focusses new housing delivery on allocated sites and windfall sites within the Settlement Boundaries of Lowestoft, the market towns, larger and smaller villages. (See Policies WLP1.1, WLP1.2 and WLP1.3). However, in order to deliver more affordable housing and other types of small scale housing in the Countryside (i.e. outside of Settlement Boundaries),

Policies WLP8.6, WLP8.7, WLP8.8 and WLP8.11 in this section allow for a small number of exceptions to this approach.

But you fail to make suggestions as to what exceptions might be made. It is improper to suggest that residents should approve such a wide ranging statement. You must provide some examples for residents to consider.

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 1003

Comment Draft Policy WLP8.7 Small Scale Residential Development in the Countryside

4.4 The draft local plan proposes policy WLP8.7 to deal with planning applications for small scale residential schemes in the countryside. The Somerleyton Estate object to this policy as currently worded.

4.5 The founding principle of the policy is understandable, seeking to provide a criteria based approach to a common type of application that also reflects Government guidance on rural housing; namely that "all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided".

4.6 However the second criteria governing proposals of up to three dwellings is unusual; requiring there to be "existing residential properties on three sides of the site" and we would query what evidence there is for this requirement being successful is delivering the extent of countryside housing required through policy WLP8.7.

4.7 Housing development in hamlets and small villages is often linear in nature and can be staggered with rows of properties offset from each other but still forming a cohesive and identified 'group'.

4.8 The LPA provide (on page 194 of the consultation draft plan) a conceptual guide to how the policy would work in practice.

4.9 The requirement for 'development on three sides' however would render a development proposal such as the one conceptualised below as inappropriate:

<SEE EMAIL and PDF>
4.10 Rather than take such a prescriptive approach that criterion should be removed and replaced with "the proposal compliments the form and layout of development in the settlement" as this would allow individual planning officer's to exercise greater professional judgement on the appropriateness of a scheme in its individual context.

Attached documents
Sotterley Estate Tom Barne  
Evolution Town Planning LLP (Steven Bainbridge)

Section  Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID  1432

Comment  The draft local plan proposes policy WLP8.7 to deal with planning applications for small scale residential schemes in the countryside.

The founding principle of the policy is understandable, seeking to provide a criteria based approach to a common type of application that also reflects Government guidance on rural housing; namely that "allsettlementscanplaya role in delivering sustainable developmentinruralareas [https://www.gov.uk/guidance/national-planning-policy-framework/6-delivering-a-wide-choice-of-high-quality-homes#para055] – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided ".

However the second criteria governing proposals of up to three dwellings is unusual; requiring there to be "existingresidentialpropertiesonthreesidesofthesite" and we would query what evidence there is for this requirement being successful is delivering the extent of countryside housing required through policy WLP8.7.

Housing development in hamlets and small villages is often linear in nature and can be staggered with rows of properties offset from each other but still forming a cohesive and identifiable 'group'.

The LPA provide (on page 194 of the consultation draft plan) a conceptual guide to how the policy would work in practice.

The requirement for 'development on three sides' however would render a development proposal such as the one conceptualised below as inappropriate (see attachment).

Rather than take such a prescriptive approach, the 'development on three sides' criterion should be removed and replaced with "the proposal
compliments the form and layout of development in the settlement” as this would allow individual planning officer’s to exercise greater professional judgement on the appropriateness of a scheme in its individual context.

Attached documents

South Norfolk District Council Adam Nicholls

Section Policy WLP8.7 - Small Scale Residential Development in the Countryside

Comment ID 1597

Comment • Policy WLP 8.7 – Small scale Residential Development in the Countryside. South Norfolk Council supports this more flexible approach to the provision of housing in hamlets and scattered settlements, which would allow for small scale infill development to come forward as long as it meets certain criteria and has the support of the local community.

Attached documents
Policy WLP8.8 - Rural Workers Dwellings in the Countryside

Broads Authority Natalie Beal

Section Policy WLP8.8 - Rural Workers Dwellings in the Countryside

Comment ID 476

Comment Page 198, Policy WLP8.8 – Rural Workers Dwellings in the Countryside. Second bullet point – and the worker’s family? You may wish to also look at our equivalent policy to see if that is of relevance/interest/use to Waveney DC.
Sally Anfilogoff

Section Policy WLP8.8 - Rural Workers Dwellings in the Countryside

Comment ID 754

Comment Chapter 8 District-Wide Strategic Planning Policies

Your draft plan states;

8.3 The Local Plan allocates a significant amount of land to accommodate new housing development, in excess of the objectively assessed need identified above. The overall strategy for the District therefore focusses new housing delivery on allocated sites and windfall sites within the Settlement Boundaries of Lowestoft, the market towns, larger and smaller villages. (See Policies WLP1.1, WLP1.2 and WLP1.3). However, in order to deliver more affordable housing and other types of small scale housing in the Countryside (i.e. outside of Settlement Boundaries),

Policies WLP8.6, WLP8.7, WLP8.8 and WLP8.11 in this section allow for a small number of exceptions to this approach.

But you fail to make suggestions as to what exceptions might be made. It is improper to suggest that residents should approve such a wide ranging statement. You must provide some examples for residents to consider.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.8 - Rural Workers Dwellings in the Countryside

Comment ID 1598

Comment • Policy WLP 8.8 – Rural Workers Dwellings. The wording of the policy states applications for the removal of an occupancy condition will only be permitted where it can be demonstrated that the dwellings has been made available to a minimum of three Registered Local Landlords. South Norfolk Council questions the definition of ‘Registered Local Landlords’ as this is not a known term to us. Does it mean locally active Registered Providers?

Attached documents
Policy WLP8.9 - Replacement Dwellings and Extensions in the Countryside

Historic England

Section: Policy WLP8.9 - Replacement Dwellings and Extensions in the Countryside

Comment ID: 1397

Comment: We welcome the identification that the existing dwelling is not a building of architectural or historical value which makes a positive contribution to the locality in policy WLP8.9. We also welcome that proposed extensions to converted agricultural buildings should not detract from the original form and character of the building. We would recommend that in paragraph 8.50 of the supporting text that reference also is made to the historic environment policies in addition to the natural and built environment policies.

Attached documents
Policy WLP8.10 - Residential Annexes in the Countryside

Broads Authority Natalie Beal

Section: Policy WLP8.10 - Residential Annexes in the Countryside

Comment ID: 477

Comment: Page 200, Policy WLP8.10 – Residential Annexes in the Countryside. You may be interested to read our equivalent policy called Residential Ancillary Accommodation.

Attached documents
Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID 1446

Comment We support the revisions to this policy.
This brings the policy more in to line with the current permitted development concessions granted on agricultural buildings for their re use as dwellings.

Attached documents
Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID 1127

Comment The Benacre Company is supportive of the Policy and is encouraged that the Council creates a Policy that is likely to see redundant rural buildings re-used into productive homes, rather than be left unused to deteriorate.

Attached documents
Environment Agency

Section  
Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID  
880

Comment  
The policy should indicate that where conservation of rural buildings is proposed in flood zone 2 and 3, a site specific flood risk assessment would be required.

Attached documents
Historic England

Section Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID 1398

Comment The best use for a building is its original use. Particularly with commercial buildings, owing to changes in practice or technological developments, their original use is not the optimum viable use to prevent it becoming redundant or disused. We welcome the aspiration to ensure that heritage assets remain in use and in good repair through their use. However, the focus of this policy on purely conversion of rural buildings to residential use does not consider the conversion that may be required for a building to remain in commercial use. We would welcome further consideration of this policy, and policy WLP8.14 on the conversion and replacement of rural buildings for employment use, in concert with those in the historic environment section, to ensure the best outcome for the buildings is planned for in Waveney.

Attached documents
Sally Anfilogoff

Section Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID 755

Comment Chapter 8 District-Wide Strategic Planning Policies

Your draft plan states;

8.3 The Local Plan allocates a significant amount of land to accommodate new housing development, in excess of the objectively assessed need identified above. The overall strategy for the District therefore focusses new housing delivery on allocated sites and windfall sites within the Settlement Boundaries of Lowestoft, the market towns, larger and smaller villages. (See Policies WLP1.1, WLP1.2 and WLP1.3). However, in order to deliver more affordable housing and other types of small scale housing in the Countryside (i.e. outside of Settlement Boundaries),

Policies WLP8.6, WLP8.7, WLP8.8 and WLP8.11 in this section allow for a small number of exceptions to this approach.

But you fail to make suggestions as to what exceptions might be made. It is improper to suggest that residents should approve such a wide ranging statement. You must provide some examples for residents to consider.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP.11 - Conversion of Rural Buildings to Residential Use

Comment ID 1599

Comment • Policy WLP 8.11 – Conversion of Rural Buildings to Residential Use. The first paragraph of the supporting text talks about how these buildings should preferably continue to be used for commercial purposes to support the rural economy; should this requirement also be reflected in the policy?

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP8.11 - Conversion of Rural Buildings to Residential Use

Comment ID 1638

Comment Policy WLP8.11 – In the supporting text, Waveney may consider a reference back to policy WLP8.35 to draw attention to the requirement for applications to be supported by appropriate Heritage Asset Assessment.
Employment

David Rogers

Section Employment

Comment ID 1090

Comment 8.57 There is some uncertainty about the number of jobs which we need to plan for and the amount of employment land required to support them. Economic projections themselves at a local level have limitations and cannot foresee new emerging sectors. The additional assumptions in the employment land evidence base around the impact of offshore wind are also uncertain as there are many variables which could affect the total number of jobs and demand for land. The conversion of jobs forecasts to land requirements is also subject to uncertainty as land and floorspace requirements can differ widely between sectors and over time as working patterns change.

Most local people would suggest there is much uncertainty about all of these points.

Which companies are likely to invest? Do we really need so many new workers when we have major employment issues? If we do not, then we clearly do not need (much) more housing.

Below are just a few examples of issues negatively affecting local employment. All sources are local or BBC.

• October 2016 Bernard Matthews sale leaves debts of £23m owed to 900 suppliers

One of Bernard Matthews' creditors is agricultural purchasing group Anglia Farmers, which is owed more than £10,000. Chief executive Clarke Willis said while that was not a large amount in the context of the company’s £250m turnover, he feared for the financial future of some of the smaller companies affected.

He said: "All of a sudden, this has sucked millions out of our local economy. It has just disappeared. To a certain extent, a firm like Tesco can stand being
owed £1m, just like we can stand our £10,000-odd. But there are some smaller companies and sole traders where £5,000 would be a really big deal."

• 13 September 2017 http://www.bbc.co.uk/news/business-41252976

Unemployment rate falls to 4.3% as wages stagnate

There’s a “but”. Of course there is. And that squeezed pay is part of it. According to the Office for National Statistics, average real earnings have declined in the past ten years.

More expensive imports have pushed up price inflation, now close to 3%. With pay up by 2.1% in the past year, you may already be doing the maths with your household budget.

And there’s also the question of job quality and job security; routes out of minimum wage jobs are tougher and more people are having to make do in the gig economy, with its zero hour contracts, long hours and poor employment protection. Bear in mind also that the jobs market is only one indicator of the economy’s health... and uncertainty looms larger than usual.

Where does that leave us? With an exceptionally tight labour market. As a bit of churn in the jobs market is inevitable and a good thing as people leave jobs for better prospects elsewhere, we’re now effectively at full employment. The ONS shows British vacancies have been rising steeply. What does an economy need when it reaches that point? Migrant labour. There’s a problem there, called Brexit. And allied to the political push to cut immigration, there’s the problem of sterling’s weakness making British wages less attractive to migrant workers once they’ve been converted into their home currencies.

• 14 September 2017 500 redundancy letters issued to Babergh and Mid Suffolk councils’ employees

All staff at Babergh and Mid Suffolk district councils have been given redundancy notices. About 500 employees have been sent a letter giving them 12 weeks notice.

• 18 Sept 2017 The UK’s statistics watchdog has stood by its criticism of Boris Johnson in a growing row over the possible financial windfall the NHS may get from Brexit.

Sir David Norgrove said he was "disappointed" the foreign secretary had
revived Vote Leave's pledge of £350m a week extra for the NHS.

Attached documents
South Norfolk District Council Adam Nicholls

Section

Employment

Comment ID

1600

Comment

• Paragraph 8.56 – would be useful to include the date of the Employment Land Needs Assessment

• Bearing in mind the general uncertainty in forecasting the number of jobs needed, there is general support for the policies in the plan as they provide for a flexible and responsive supply of land for employment development.

Attached documents
Southwold Town Council Lesley Beevor

Section Employment

Comment ID 1571

Comment It is important to have a policy within the Local Plan that promotes the development (both new build and conversion) of affordable business space. We refer the Local Plan drafters to Islington Guidance on Affordable Workspace, December 2014, which could be adapted to local circumstances, especially in Southwold, which because of high land values and a shortage of space, has similar problems to London.

The Islington Guidance highlights "a number of studies that in recent years have demonstrated the importance of retaining economic diversity, which directly supports economic growth, productivity and resilience... Many small businesses and start-ups with the potential for financial self-sufficiency have particular needs that often cannot be met by the market, either because of affordable rents are unviable for the developer, or it is below a standard expectation of return... Affordable workspace can be a key driver to support a flourishing local economy." See P. 2

In Southwold, because of a lack of land and the relentless conversion of work space to residential uses, there is a need for a policy that would prevent permissible change of use from work space to residential. Could this be achieved by zoning all of Southwold as an area where such change is resisted? See P 5 of the Islington Guidance, referring to Central Activities Zone, which benefit from an exemption to the office to residential permitted development rights.

We refer you to Core Strategy Policy CS13: Employment spaces, on p. 3 of the Islington Guidance, and urge its adoption in the Waveney Local Plan. This would then allow Neighbourhood Plans to develop local policies for their specific circumstances.

Attached documents
Policy WLP8.12 - Existing Employment Areas

Broads Authority Natalie Beal

Section Policy WLP8.12 - Existing Employment Areas

Comment ID 478

Comment 8.62 says (B class use). Do you mean non-B class use?

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.12 - Existing Employment Areas

Comment ID 1601

Comment • WLP8.12 – Existing Employment Areas. Paragraph 8.6 suggests that outside existing employment areas premises will be able to convert to any use subject to compliance with other policies in the plan. Whilst recognising what is stated on the matter in the Housing White Paper, it is surprising that there is no aim to retain these businesses for commercial use and no requirement for any kind of marketing to take place to demonstrate that the employment use is no longer viable before permission to convert would be granted.

• South Norfolk Council supports the approach taken in paragraph 8.65 and policy WLP8.12 to allow quasi-retail uses such as car showrooms, tyre and exhaust centres and builders’ merchants on the main road frontage of employment areas, recognising that these uses are often not suitable in town centre locations or within employment areas. Would it be possible to identify particular areas where this may be acceptable?

Attached documents
Southwold Town Council Lesley Beevor

Section: Policy WLP8.12 - Existing Employment Areas

Comment ID: 1566

Comment:
The SNP, Coastal Communities Economic Plan and the Feasibility Study for the Southwold Hospital site have all identified a need for start-up, micro and small business space. Re 8.62, the Southwold Business Centre (SBC), off St. Edmund's Road, Southwold, should be identified in the Local Plan and preserved as employment space. STC representatives were told that WDC's Development Management Team is "aware".

WLP8.12 protects existing employment areas likely to be at risk of conversion to residential and illustrated on a map.

The map does not, however, include Southwold Business Centre and STC would seek to correct this omission and identify the site both visually and within the text.

More areas can be identified through NPs and Child's Yard, off the Market Place, in Southwold, is a site worthy of examination, too.

Attached documents
Tim Basey-Fisher

Section Policy WLP8.12 - Existing Employment Areas

Comment ID 780

Comment The Policy is generally supported. However, it is not clear whether it also applies to employment sites with planning permission and not just Employment Areas identified on the new Policies Map.

Required Change:

The Policy should be amended to confirm whether or not it applies to existing permitted and undeveloped employment areas.

Attached documents
Policy WLP8.13 - New Employment Development

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.13 - New Employment Development

Comment ID 1128

Comment The Benacre Company is broadly in support of the Policy.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.13 - New Employment Development

Comment ID 1602

Comment • WLP8.13 – New Employment Development. South Norfolk Council is supportive of the approach in paragraph 8.67 and policy WLP8.13 to allow new employment development outside settlement boundaries but adjacent to existing employment areas for new and expanding businesses subject to a strict set of criteria as this allows flexibility for local businesses wishing to relocate or expand and gives the Council a policy position to respond more quickly and flexibly to speculative applications for larger businesses wishing to move to the district.

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

Section Policy WLP8.13 - New Employment Development

Comment ID 1137

Comment Where it refers to Employment, we would support the statement from WLP 4.5 & WLP 8.13.

With the indicated planned housing development of 740 of which already have planning permission or have been completed since 2014, the need to support more employment development (WLP4.5 Broadway Farm) is vital and a mechanism to ensure delivery of this should be established.

Attached documents
Policy WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use

Comment ID 1129

Comment The Benacre Company is supportive of the Policy and encourages active steps to be taken to aid generation of employment within the region with the re-use of rural buildings outside of the principal settlement boundaries.

Attached documents
Environment Agency

Section  Policy WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use

Comment ID  881

Comment  As with rural buildings converted to residential use, those being converted for employment use should be accompanied by a site specific flood risk assessment when they are located in flood zones 2 and 3.

Attached documents
Historic England

Section Policy WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use

Comment ID 1399

Comment The best use for a building is its original use. Particularly with commercial buildings, owing to changes in practice or technological developments, their original use is not the optimum viable use to prevent it becoming redundant or disused. We welcome the aspiration to ensure that heritage assets remain in use and in good repair through their use. However, the focus of this policy on purely conversion of rural buildings to residential use does not consider the conversion that may be required for a building to remain in commercial use. We would welcome further consideration of this policy, and policy WLP8.14 on the conversion and replacement of rural buildings for employment use, in concert with those in the historic environment section, to ensure the best outcome for the buildings is planned for in Waveney.

Attached documents
Suffolk County Council Robert Feakes

Section  
Policy WLP8.14 - Conversion and Replacement of Rural Buildings for Employment Use

Comment ID  
1639

Comment  
Policy WLP8.14 (Page 206) - In the supporting text, Waveney may consider a reference back to policy WLP8.35 to draw attention to the requirement for applications to be supported by appropriate Heritage Asset Assessment.

Attached documents
Tourism

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section
Tourism

Comment ID
1479

Comment
In general, Bourne Leisure considers that the Draft Local Plan supports the development of the tourism industry in Waveney, as illustrated in the supporting text of draft Policy WLP8.17 (Protection of Existing Tourist Accommodation). The Company endorses this text (paragraphs 8.71 – 8.73) and, in particular, the statement that the tourism industry is 'a vital part of Waveney's economy' and the reference to the Employment Land Needs Assessment Update which 'predicts a significant growth in jobs in the tourism sector'.

Attached documents
Broads Authority Natalie Beal

<table>
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<th>Section</th>
<th>Tourism</th>
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**Comment ID** 479


**Attached documents**
John Clark

Section       Tourism

Comment ID   123

Comment       Also reinstate the tourist information centre again, as this was the only office to obtain the tickets for the National Coach to London Victoria. This was something else that was closed down.

Attached documents
Lowestoft Town Council Shona Bendix

Section Tourism

Comment ID 1292

Comment The WDC Draft document does not address the use of AirBNB and internet micro letting trends in the hospitality industry and their effect on local hotels and B&Bs—

Under the Town and Country Planning Act 1990 (the "1990 Act") planning permission is required for the carrying out of any development of land (subject to certain provisions). The meaning of development is set out in section 55(1) of the 1990 Act and includes a material change of use. Section 25 (of the 1973 Act) deems the change of use from residential premises to temporary sleeping accommodation as a material change of use. This brings the change from residential premises to temporary sleeping accommodation within the definition of development and means that it therefore requires planning permission.

The LTC requests that all micro-letting of rooms and parts of rooms for temporary accommodations be in category Class C1 if the letting arrangements are more than 28 days in a calendar year.

Attached documents
Marine Management Organisation Stacey Clarke

Section               Tourism

Comment ID            56

Comment               Thank you for giving us the opportunity to comment on the draft Waveney Local Plan.

It is pleasing to see reference to the Marine Policy Statement and East Inshore and Offshore Marine plans is made including a more in-depth reference in section 8.7 around tourism.

Attached documents
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<td>Attached documents</td>
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Norman Castleton

Section          Tourism

Comment ID      575

Comment          Tourism: If the overdevelopment is proceeded with as per the proposals in this draft plan then people will not want to come to the area. They might as well stay at home and survey the vast housing estates from their lounge windows. In Lowestoft their has been little attempt since austerity to develop a worthwhile tourist venue. Historic buildings and local amenities have been allowed to deteriorate and then be closed or destroyed. Even the once attractive beach north of the Claremont Pier has all but disappeared because the sea defences were not properly maintained and the tourism office was closed. Thanks to the holiday camp operators at Hopton & Corton private cliff saving work via new sea defences have saved the immediate area and the beaches for the the visitors. Therefore, I think any words here about tourism are just words.

Attached documents
### Rosemary Simpson

**Section**  
Tourism

**Comment ID**  
145

**Comment**  
Why in this development is there no provision for campsites for the huge industry in this area as a whole?

**Attached documents**
Policy WLP8.15 - New Self Catering Tourist Accommodation

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section  Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID  1480

Comment  Bourne Leisure also particularly supports the last sentence of paragraph 8.76 which states:

'Large developments should also provide on-site commercial, recreational or entertainment facilities to serve day to day needs of tourists.'

Corton and Gunton Hall Coastal Villages provide a wide range of facilities including restaurants, sports facilities and spa rooms. These facilities attract visitors to the tourism sites themselves, and to the wider Waveney District.

The Company also supports the Council's innovative and flexible approach at paragraph 8.78, which is intended to limit the number of breaches of holiday occupancy conditions. However, each proposal should be considered on a case by case basis, dependent on the type of tourist accommodation. Such an approach should be made clear, as proposed below:

"...As such If necessary, planning conditions or legal agreements should require new self-catering tourist accommodation units to be vacated for a specified and continuous period of at least six weeks of the calendar year. In order to facilitate year round holiday use, the Local Planning Authority will allow proposals to vacate half the site at one time, and the rest of the site later that year. Each proposal will be determined on a caseby-case basis."

The approach reflects national planning policy, which advises that Local Plans should be 'aspirational but realistic' (NPPF, para 154).

Bourne Leisure therefore considers that the supporting text as referenced
above (as suggested to be amended) would accord with national planning policy (para. 28 NPPF), in that the text supports sustainable rural tourism and leisure developments, including the provision and expansion of tourist and visitor facilities in appropriate locations.
Broads Authority Natalie Beal

Section Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID 480

Comment 8.79. Please mention the Broads specifically here.
<table>
<thead>
<tr>
<th><strong>Environment Agency</strong></th>
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<tr>
<td><strong>Section</strong> Policy WLP8.15 - New Self Catering Tourist Accommodation</td>
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<tr>
<td><strong>Comment ID</strong> 882</td>
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<tr>
<td><strong>Comment</strong> We feel the policy should acknowledge the vulnerability of some types of self-catering accommodation to flood risk. We feel the policy should indicate that owners or site managers should sign up for flood warnings and have flood evacuation plans in place to help mitigate this risk.</td>
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<tr>
<td><strong>Attached documents</strong></td>
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Lowestoft Town Council Shona Bendix

Section Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID 1294

Comment WLP 8.15 – New Self Catering Tourist Accommodation – covered cycle storage to be provided on site b pitches of over 80 caravans should be near bus routes.

The LTC agrees with this goal of cycle storage and would also like to see a policy to promote bicycle rental options for tourists and residents.

Attached documents
Peter Eyres

Section Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID 1085

Comment This policy reaffirms the intention to maintain a gap between Lowestoft and Corton, yet the "open break" and "open space" designations on the current policies map have been removed from the Dip Farm miniature golf course and the field on the other side of the old railway line: please explain the reasons for the removal of the designations. This leaves these spaces with no designation, while policy WLP8.15 seems purpose-designed to fill them with self-catering tourist accommodation, plus the requirement in the policy to add "commercial, recreational or entertainment facilities". It is profoundly to be hoped there is not an intention to put caravans on Dip Farm, as has been mooted. This would be totally incompatible with the intention to prevent coalescence of these two settlements and should be opposed.

Attached documents
Peter Eyres

Section  Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID  1081

Comment  This policy seems to indicate a strong intention to put self-catering accommodation on the Dip Farm miniature golf course: this should be opposed as to do so would contravene policy WLP8.34, to protect the sense of leaving Lowestoft before arriving in Corton by not adding buildings, signs, lights and other development along the road.

I support the requirement to provide covered cycle storage.

Attached documents
Sue Barnard

Section Policy WLP8.15 - New Self Catering Tourist Accommodation

Comment ID 1084

Comment WLP 8.15 – New Self Catering Tourist Accommodation – covered cycle storage to be provided on site and pitches of over 80 caravans should be near bus routes! Where is the nearest bus route for the Tingdene North Denes park?

Attached documents
Policy WLP8.16 - New Hotels and Guest Houses

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.16 - New Hotels and Guest Houses

Comment ID 1130

Comment The Benacre Company would like to see the Policy broadened to allow new build or conversion of buildings into country hotels located away from the sea front locations, but within the open countryside/minor settlements and close to major traffic routes. The region is becoming increasingly popular with walkers and bird watchers, who are attracted to areas away from the coast in quieter, less populous locations and we feel the Policy should be broad enough to consider sensitive applications for the creation of hotels away from Carlton Colville, Lowestoft, Kessingland and Southwold.

Attached documents
South Norfolk District Council Adam Nicholls

Section  
Policy WLP8.16 - New Hotels and Guest Houses

Comment ID  
1603

Comment  
- Policy WLP8.16 – New Hotel and Guest Houses. It is presumed that the reference to streets where further conversions to flats or Houses in Multiple Occupation would not be permitted in paragraph 8.82 and policy WLP 8.16 refers to the 'flat saturation zones' discussed under policy WLP8.4 and its supporting text? Should this terminology be used here (perhaps with a cross reference to the earlier policy?). It may also be useful to state that these areas are shown on the proposals map.

Attached documents
Policy WLP8.17 - Existing Tourist Accommodation

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section: Policy WLP8.17 - Existing Tourist Accommodation

Comment ID: 1481

Comment: The Company agrees with the general approach of draft Policy WL8.17 which seeks to protect the existing stock of hotels, guesthouses and self-catering accommodation and recognises their importance to the District’s tourism economy. However, Bourne Leisure is concerned that there is no explicit statement that supports proposals for the expansion of, or improvements to existing tourism accommodation and facilities in the emerging policy of the Draft Plan. For Gunton Hall and Corton Coastal Villages to continue to attract customers and to respond to changing market conditions, Bourne Leisure needs to invest regularly in order to provide new and improved facilities and accommodation. Improvements can necessitate the expansion of sites in order to improve the quality of accommodation, decrease densities, or increase the range of facilities in order to respond to visitor’s requirements. It is therefore vital that there is support in planning policy for such development proposals.

Bourne Leisure is particularly concerned that Gunton Hall is located outside of defined settlement boundaries and is therefore classified to be within the ‘Countryside’. Draft Policy WLP1.3 (Settlement Boundaries) restricts the development of new D2 use in the countryside ‘except where other policies in the plan indicate otherwise’. There is no indication in Policy WLP1.3 that the expansion of existing tourist accommodation in a ‘Countryside’ location would be acceptable.

Corton Coastal Village is within the Corton Settlement Boundary but occupies a seafront location. Bourne Leisure notes that draft Policy WLP8.16 (New Hotels and Guest Houses) includes an exception to draft Policy WLP1.3 (Settlement Boundaries) which permits newbuild hotels and guest houses seafront locations in Corton, Lowestoft, Kessingland and
Southwold:

'New build hotels and guest houses will be supported in seafront locations in Corton, Lowestoft, Kessingland and Southwold.'

Therefore whilst Bourne Leisure supports the - at times innovative - emerging plan approach to encouraging investment in the District’s tourism industry in the supporting text of draft Policy WLP8.17, the Company does not consider that this approach is translated into policy itself. It is therefore requested that the Local Plan includes a clear, specific policy which supports the expansion of, and improvements to existing tourism businesses, in addition to their protection, including those located in countryside or seafront locations. The suggested amendments to draft Policy WLP8.17 below would ensure that the Council does not limit inward tourism investment and that future policy will support the expansion and improvement of a mix of tourism accommodation in the District, to ensure their continued operation:

Policy WLP8.17 – Existing Tourist Accommodation

'Existing tourism accommodation will be protected.

Provided that the new development is not contrary to other policies of this Local Plan, proposals for expansion and improvements to existing tourism sites will be supported within settlement boundaries.

Provided that the new development is not contrary to other policies of this Local Plan, proposals for expansion and improvements to existing tourist accommodation sites will also supported in:

1 Countryside locations; and

2 Seafront locations in Corton, Lowestoft, Kessingland and Southwold.

Change of use will only be considered in exceptional circumstances where it can be fully and satisfactorily demonstrated that there is no demand for the tourist accommodation.

Marketing evidence must be provided which demonstrates the premises have been marketed for a sustained period of a minimum of 12 months in accordance with the requirements set out in Appendix 6.'
Southwold Town Council Lesley Beevor

Section Policy WLP8.17 - Existing Tourist Accommodation

Comment ID 1559

Comment Policy 8.17 protects 'guest houses' from being converted to residential. STC representatives asked for this to be clarified to include bed and breakfast accommodation and were asked to include this request in this formal submission, as it was considered material.

Attached documents
Retail, Leisure and Town Centres

South Norfolk District Council Adam Nicholls

Section Retail, Leisure and Town Centres

Comment ID 1604

Comment • Paragraph 8.90 – would be useful to add the date of the Retail and Leisure Needs Assessment

Attached documents
Policy WLP8.18 - New Town Centre Use Development

Beccles Town Council C Boyne

Section  Policy WLP8.18 - New Town Centre Use Development

Comment ID  1156

Comment  The council would like to either extend the lines OR suggests that this policy is changed to replace "Within Secondary Shopping Frontages" with "Within the remainder of the Town Centre Boundary". Policy WLP8.18 (and indeed the whole local plan) indicates that there is a need for greater retail provision. It tries to ensure that new retail provision is developed within town centre boundaries, or within 300m of them to ensure the town centres remain vibrant. Policy WLP8.19 weakens this by allowing shop fronts to be taken away because they are just outside the green line, even though they are in the town centre.

Council believes that the reason behind ending the green lines short of the town centre boundaries is that, typically, there is more mixed residential/shop frontage on the edges. However, it is essential that the town centre is protected and that the current shops are retained, thus the suggested change.

Attached documents
Section | Policy WLP8.18 - New Town Centre Use Development

Comment ID | 1471

Comment | Introduction and Background

We write on behalf of our client, Brookhouse Group Limited, in respect of the above. Brookhouse is the owner of North Quay Retail Park, on Denmark Road, in Lowestoft.

The Retail Park is located approximately 2km west of Lowestoft town centre. Although it is not located in a defined centre, it is the principal retail warehouse location in the town providing floorspace for large format operators, providing 15 retail units and over 21,000 sq. m of floorspace.

The development of the Retail Park has benefited from the support of the Local Planning Authority who have granted numerous permissions for the development of the site over the last 25 years.

Content of the Draft Local Plan

The draft Local Plan outlines at Policy WLP 8.18, the approach taken to the development of town centre uses. The policy states that such development will be permitted within the town centre boundaries. Furthermore, the policy goes on to state that, where no suitable or available sites exist within the town centre, a proposed development will be permitted on edge of centre sites. For retail development, 'edge of centre' is defined as within 300m of the Primary Shopping Area (PSA), whilst for other town centre development, it is defined as within 300m of the town centre boundary.

Regarding development for town centre uses outside of town centres, Policy WLP 8.18 states that any such proposed development would only be permitted where:

* The location is accessible by public transport and is accessible to pedestrians and cyclists;
* The site has good links to the Town Centre, or links can be improved; and

* The site will not impact upon other neighbouring uses, in terms of traffic, parking, and amenity. In addition, the Policy requires that:

'Planning applications for Town Centre Use development on edge of centre, and out of centre sites over 350 sq. m should be accompanied by an Impact Assessment which demonstrates the proposal will have no significant adverse impact on the vitality and viability of the Town Centre, and no significant adverse impact on any Town Centre investments.'

Representations in Relation to Retail Development Policies

The justification for requiring the submission of an impact assessment for all town centre use development over the proposed threshold of 350 sq. m of floorspace suggested to be derived from the recommendations provided by Carter Jonas as part of the 2016 Retail Study.

Paragraph 26 of the National Planning Policy Framework enables Local Planning Authorities to set a proportionate, locally set floorspace threshold that is lower than the national threshold of 2,500 sq. m.

Paragraph: 016 Reference ID: 2b-016-20140306 of the National Planning Practice Guidance confirms that:

'...In setting a locally appropriate threshold it will be important to consider the:

* scale of proposals relative to town centres

* the existing viability and vitality of town centres

* cumulative effects of recent developments

* whether local town centres are vulnerable

* likely effects of development on any town centre strategy

* impact on any other planned investment'

The Retail Study, which is listed as background evidence for the draft Local Plan, states at Paragraph 15.4 that their assessment of retail trends has highlighted dynamic growth in smaller convenience retail stores (i.e. Aldi, Lidl, Tesco Express, Sainsbury's Local). The Study states that where these are proposed on the edge or outside smaller centres and villages, they could result in a significant adverse impact on that centre's overall vitality.
and viability.

Paragraph 15.7 states:

'In our judgement this is a reasonable impact threshold as it will provide the local planning authority with sufficient flexibility to assess the merits and implications of edge and out-of-centre foodstore applications that could potentially have significant implications for the viability and delivery of new or extended floorspace in these existing centres. We also advise that this threshold should be applied, where relevant, to change of use applications and applications seeking variations of conditions.'

The proposed threshold of 350 sq. m lies in stark contrast to that of the nationally imposed threshold of 2,500 sq. m, contained within the NPPF.

The 'smaller local and village centres' referred to at Paragraph 15.4 of the Retail Study are presumably those are the lower end of the Retail Hierarchy for Waveney District Council, as defined by Policy CS10 of the Core Strategy. These include the District Centres of Kirkley & Oulton Broad, as well as a number of Local Centres. However, the only town centres represented on the Policies Map submitted as part of the draft Local Plan documents, are those of Lowestoft, Beccles, Bungay, Halesworth and Southwold.

It is clear from the above that the proposed threshold of 350 sq. m has been suggested by Carter Jonas only to prevent new edge and out of centre 'convenience goods' retail development drawing expenditure away from smaller centres in the hierarchy.

The Council have provided no evidence base to support a threshold of 350 sq. m for assessing the impact of comparison goods retail development. Written, quantifiable evidence is required to support the imposition of any impact threshold below the 2,500 sq. m national threshold. The evidence is required to address the considerations as set out above in the National Planning Practice Guidance.

In the absence of provision of any such evidence, the national threshold of 2,500 sq. m should be adopted for assessing the impact of comparison goods floorspace, or alternatively, an evidence-based threshold should be provided to justify and enable stakeholders to consider as part of the Local Plan consultation and alternative lower threshold suggested.

Conclusion

Brookhouse Group is a long term stakeholder in Lowestoft. We trust that its comments above will be considered as part of this consultation and either
the national threshold will be adopted for assessing the impact of comparison goods floorspace, or an evidence base will be prepared to support any lower threshold that takes into account the 'important' considerations of the National Planning Practice Guidance that stakeholders can review as part of any next stage consultation process.

Brookhouse reserves the right to provide representations at the Inquiry in the absence of evidence being produced by the Council which justifies the imposition of the retail impact threshold of 350 sq. m for comparison goods retail floorspace.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.18 - New Town Centre Use Development

Comment ID 1297

Comment WLP 8.18 – High Street excluded, no public transport or need to provide by its exclusion

The LTC supports reconfiguring the one way traffic pattern on upper High Street. This will allow the option of buses include High Street in their routes because the direct of travel now doesn't allow them to pull off to the side at a layby on the left to load and unload passengers.

Attached documents
Sainsburys (c/o Indigo Planning Limited) Sean McGrath
Indigo Planning (Victoria Chase)

Section Policy WLP8.18 - New Town Centre Use Development

Comment ID 1176

Comment
On behalf of our client, Sainsbury's Supermarkets Ltd, we submit representations in respect of the Waveney District Council First Draft Local Plan.

Proposed Policy WLP8.18 New Town Centre Use Development suggests the requirement for an impact assessment to be submitted with proposals of more than 350sqm on sites for town centre uses on edge of centre or out of centre sites.

Although the proposed Policy WLP 8.18 is based on empirical evidence, we consider that for the Council to be able to assess the cumulative effects of edge of centre and out of centre development, a more appropriate threshold is 750sqm for out of centre retail developments.

Attached documents
Southwold Town Council Lesley Beevor

Section  Policy WLP8.18 - New Town Centre Use Development

Comment ID  1560

Comment  P.212 is worthy of a slight revision and, again, it was requested that this form part of a formal response. The reason being that Southwold not only provides for the ordinary needs of residents of the town and surrounding parishes but, also, provides a strong tourism function.

Attached documents
The Halesworth & Blyth Valley Partnership Ezra Leverett

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<tr>
<th>Section</th>
<th>Policy WLP8.18 - New Town Centre Use Development</th>
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<tr>
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<td>1135</td>
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| Comment       | We would support the statement from 8.94 that 'Town Centres currently face many challenges, particularly competition from the internet and out of centre retail parks it is therefore critical that the local plan protects and enhances the vitality and viability of the District's town centres'

Halesworth is the 'hub' for surrounding villages and where the main retail should be located. To maintain this 'vitality and viability' planners should resist any loss of retail premises in Halesworth Town Centre.

Attached documents
Tim Basey-Fisher

Section  
Policy WLP8.18 - New Town Centre Use Development

Comment ID  
781

Comment  
The Policy replicates policies in the National Planning Policy Framework, and does not need to be repeated.

Required Change:
The Policy should be amended to delete elements that replicate NPPF Policy.

Attached documents
Policy WLP8.19 - Vitality and Viability of Town Centres

Beccles Town Council C Boyne

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 1155

Comment Policy WLP8.19 is attempting to ensure that town centres do not get eroded by change of use applications. It differs significantly from the current local plan in which the town centre boundary is used to determine the applicability of change of use. The new policy distinguishes between primary and secondary shopping frontages and only restricts change of use to these frontages. This will allow change of use to all those shops outside the marked green and blue lines.

The council would like to either extend the lines OR suggests that this policy is changed to replace "Within Secondary Shopping Frontages" with "Within the remainder of the Town Centre Boundary". Policy WLP8.18 (and indeed the whole local plan) indicates that there is a need for greater retail provision. It tries to ensure that new retail provision is developed within town centre boundaries, or within 300m of them to ensure the town centres remain vibrant. Policy WLP8.19 weakens this by allowing shop fronts to be taken away because they are just outside the green line, even though they are in the town centre.

Council believes that the reason behind ending the green lines short of the town centre boundaries is that, typically, there is more mixed residential/shop frontage on the edges. However, it is essential that the town centre is protected and that the current shops are retained, thus the suggested change.

Attached documents
John Clark

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 121

Comment Also the Lowestoft shopping area needs to be improved 200% more shops factorys etc, as there more and more people and familys moving to the area.

Seeing that Lowestoft is the largest town in Suffolk surely this makes very good sense to improve the town by 200% as above.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 1532

Comment 1.12 About 500 net new jobs will be in sectors requiring new employment premises (B1,B2, B8).

Lowestoft will continue to need large scale office space in the Power Park, LNR and High Street area. We urge that the Council prioritize business and employment over the needs for housing in these areas. In the High Street, LRN, LRS and historical areas we urge that heritage buildings will prioritize ground floor as dedicated to business/retail space and the upper floors to residential.

Attached documents
Lowestoft Town Council Shona Bendix

Section: Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID: 1531

Comment: Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Kirkley, High Street and LNR shopping areas, provided there is a ground floor retail use in accordance with the above.

Proposals for the change of use of ground floor retail units to community facilities will be permitted provided that:

- the unit does not occupy a prominent position in the Centre;
- satisfactory vehicular access and car parking can be provided;
- the unit has suffered from a clearly demonstrated long-term vacancy for a period of at least 12 months; and iv. the physical treatment of the unit minimises the problem of dead frontages or is appropriate to the proposed use.
- is appropriate in scale and supports the needs of the adjacent residential area;
- is accessible to all sectors of the community.

The class categories of drinking establishments and hot food takeaways has been set at 20% of retail frontages. This will assist in controlling the night-time economy and allow for critical mass of daytime open shops to encourage foot traffic and a thriving retail street.

Attached documents
Peter Eyres

Section  Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID  1088

Comment  For some reason, the north side of Bevan Street East has not been included as a shopping frontage although it is quite as important as the south side which is.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 1227

Comment 4.4 Vitality and Viability of Town Centres (Policy WLP8.19)

The viability of Southwold High Street is a vital issue for our community and economy. Residents of Reydon both work in Southwold High Street and use its shops. The policy proposes controls on changes of use but we are concerned that these are not adequate to protect the independent character of the High Street. Other measures need to be added here such as limiting the extension of floor space in current shop units so that they remain appropriate and affordable for independent retailers.

Although beyond the scope of the Local Plan, we would wish to stress here that the setting of business rates for High Street retail premises also has a direct bearing on the viability of a High Street such as Southwold. We urge Waveney to do all it can, working with central government to find an equitable long term solution to this issue.

Attached documents
South Norfolk District Council Adam Nicholls

Section  Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID  1605

Comment  • Policy WLP8.19 – Vitality and Viability of Town Centres. Is there any merit in including target percentages for A1 uses for the key retail centres in the policy to ensure that the number of A1 uses in those primary shopping area and town centres does not fall below certain levels (South Norfolk’s Development Management Policies document has several policies for Diss and Wymondham in particular on this matter)? The policy currently refers to statements like the 'dominant retail appearance', 'concentration of uses in the immediate street frontage'; how will these be assessed?

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 1181

Comment The viability of Southwold High Street is a vital issue for our community and economy. The policy proposes controls on changes of use but we are concerned that these are not adequate to protect the independent character of the High Street. Other measures need to be added here such as limiting the extension of floor space in current shop units so that they remain appropriate and affordable for independent retailers.

Attached documents
Southwold Town Council Lesley Beevor

Section Policy WLP8.19 - Vitality and Viability of Town Centres

Comment ID 1561

Comment Policy 8.96 should highlight that Southwold's high rents, in turn, leading to high business rates, drive out independent businesses and deprive customers of choice.

Attached documents
Policy WLP8.21 - Sustainable Transport

Beccles and Bungay Cycle Strategy Ian Reid

Section Policy WLP8.21 - Sustainable Transport

Comment ID 1027

Comment BBCS broadly welcome this policy. We feel that the wording could be made stronger so that new developments are specifically designed from the outset to promote walking and cycling and thus reduce reliance on private motor vehicles. The location of schools and other services should be designed in such a way that walking and cycling are the most convenient and most attractive option.

We also feel that shared use paths should be designed to accommodate mobility vehicles as well as cycles and pedestrians.

Attached documents
**Bourne Leisure Ltd (Lichfields) -**
Lichfields (Sian Davies)

**Section**  
Policy WLP8.21 - Sustainable Transport

**Comment ID**  
1483

**Comment**  
Bourne Leisure endorses the vision of draft Policy WLP8.21 to restrict the use of the private car and support sustainable transport uses. The Company understands the importance of minimising climate change and this aligns with the national principle of a presumption in favour of sustainable development.

However, the NPPF also states that local plans should be both aspirational and realistic (para. 154). Many of Bourne Leisure's sites are in rural locations, making the use of public transport difficult, and, car use is often the only suitable as well as preferable mode of transport for groups traveling to tourism destinations such as holiday parks and hotels. The Company therefore requests the following addition to draft Policy WLP8.21, to ensure that visitors are not discouraged from visiting the District:

"Development will be supported where possible:...."
Gary Shilling

Section Policy WLP8.21 - Sustainable Transport

Comment ID 9

Comment All houses should have the minimum capability to provide "OFF ROAD" car parking for three cars! This should be a must as all current housing developments DO NOT provide anywhere near enough parking (Let alone off road). This should not include the garage as a space as 8/10 times a garage will never see a car inside it.

Attached documents
Gladman Developments Limited Richard Crosthwaite

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<th>Section</th>
<th>Policy WLP8.21 - Sustainable Transport</th>
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| Comment ID | 966 |

| Comment | Policy WLP 8.21 relates to the need to encourage development that enables residents to use non-car modes. This is an important policy requirement, however it is considered essential that this also reflects the emphasis that is provided in Section 4 of the Framework, which indicates that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people, but also acknowledge that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. |

| Attached documents | |


Lowestoft Town Council Shona Bendix

Section  Policy WLP8.21 - Sustainable Transport

Comment ID  1299

Comment  The LTC urges the WDC to promote a policy to require electric vehicle power points in all new or updated retail and large (more than two cars) residential developments car parks. The power points can be franchised, private or public.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.21 - Sustainable Transport

Comment ID 1296

Comment We need to protect carpark from development and perhaps recommend a minimum parking standard for all new developments of 1 space for each two bedrooms.

If people are to be encouraged to walk, cycle and use public transport, to help the town achieve environmental and health objectives, then developments must be located and designed such that these modes rival the car for cost and convenience.

It will include-

- changes to the town centre bus station on Gordon Road;
- expansion and improvement of other bus facilities, especially our east/west routes;
- an Urban Traffic Management and Control system that will reflect changes in traffic patterns as a result of the new 3rd Crossing;
- a Real Time Passenger Information system;
- and a detailed programme of improvements to walk/cycle routes and crossings in and around the town centre, along the coastal path/beachfront, and along the east/west routes from the train station across to Oulton Broad and the Suffolk Wildlife Reserve.
- Sensitivity to our elderly and disabled population who depend on public transportation and so need covered bus shelters, convenient bus stops and an effective east/west bus system. It's very difficult to go from Kirkley or north Lowestoft to the North Quay Retail Park.

This policy is also aimed at ensuring the accessibility of buildings and developments by people whose mobility is impaired.
Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.21 - Sustainable Transport

Comment ID 1298

Comment WLP 8.21 – 4TH bullet point re cycle paths and public footpaths in new developments- do cycle paths happen?

In order to support Lowestoft residents in adopting sustainable lifestyles, the Council will ensure that the layout of new developments makes adequate provision for travel by cycle, their safe storage, and provision for the recycling of waste materials.

Attached documents
**Nicky Elliott**

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<tr>
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<tr>
<td>Comment</td>
<td>Policy WLP8.21 - Sustainable Transport: New developments should be specifically designed to promote walking and cycling and thus reduce reliance on private motor vehicles. The location of schools and other services should be designed in such a way that walking and cycling are the most convenient and most attractive option.</td>
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**Attached documents**
Paul Cope

Section Policy WLP8.21 - Sustainable Transport

Comment ID 433

Comment Cycle routes are important and they should be a part of the planning. The success of the path across the Millenium Green in Halesworth which is used by all sorts of people with bicycles, buggies, wheelchairs and dogs shows what can be achieved. Along with paths traffic calming and measures to reduce traffic speed in towns and villages and on the lanes around Waveney should be considered. Driving standards are discernably dropping and traffic speeds increasing following the decline in active traffic policing in the area following cuts. Road safety for all but particularly for more vulnerable road users on bicycles and feet should be a major priority in planning. A major factor in people not cycling is because of safety concerns and that is related to traffic speed and attitudes of drivers.

Attached documents
Peter Eyres

Section Policy WLP8.21 - Sustainable Transport

Comment ID 1099

Comment This policy contains fine words, which I strongly support, but the key to delivering sustainable transport is the political will of the council in following through. New development is often the best mechanism for providing new cycling infrastructure both within the site itself and with section 106 or Community Infrastructure Levy funding for components of the network outside the site. New development can also make the difference between filling in a missing link or blocking it forever, and development control officers need to be vigilant to watch for these opportunities. The Waveney Cycle Strategy is clearly an important tool in ensuring that these things happen, provided it is used, and I strongly support it.

What is sad is that, all too often, well-intentioned facilities are spoilt by poor design, by clients or designers who do not understand cycling and probably do not cycle themselves or are unfamiliar with the local area. Consultation with local cycling groups is therefore vital at all stages of the design. Another problem is that cycle facilities can be seen as secondary, an add-on, which means that they are always going to go off half-cock, whereas consideration of requirements from the concept stage of the design will allow cycling to be incorporated from the start in a way that is integral to the development: this applies to both cycle tracks themselves and perhaps especially cycle parking. It's really not good enough for cycle parking to be left to planning conditions: after all, provision for cars and lorries would not be left to a late stage in the design.

There cannot be too much emphasis on the need to provide secure, convenient, covered cycle parking, enclosed for longer stays, whether at home or work, at shops or leisure. Again, the facilities provided too often show a lack of understanding of cyclists' needs or even of the English weather. Sheffield stands are the best, but are often placed too close to surroundings (600mm is the minimum acceptable gap all round), and off-the-shelf canopies often seem more designed to look good than actually to
keep the rain off (a frequent error is that the eaves line is simply too high – it should be the minimum necessary to avoid bumping one's head – or does not extend far enough – it should be at least one metre wider than the bicycles it is sheltering, i.e. a minimum total width of 4 metres).

If a real effort were to be put into providing high-quality cycle facilities, not only in new development but also by the highways authorities, cycling would increase and congestion reduced or prevented. Is there the will to do this?

Attached documents
Community Services and Facilities

Simon Phillips

Section Community Services and Facilities

Comment ID 1059

Comment WDC should do more in this regard than it has in the past.

Attached documents
Policy WLP8.22 - Built Community Services and Facilities

Broads Authority Natalie Beal

Section Policy WLP8.22 - Built Community Services and Facilities

Comment ID 481

Comment Page 221, Policy WLP8.22 - Built Community Services and Facilities. For clarity, if the process is followed, the community do not buy the Asset and it is then sold, does it automatically stop being an Asset and is de-registered as such? If not, as the policy is worded, nothing can happen to the Asset even though due process has been followed.

Attached documents
Lowestoft Town Council Shona Bendix

Section  
Policy WLP8.22 - Built Community Services and Facilities

Comment ID  
1300

Comment  
We need to take a lead on Green issues. As well as WDC providing individual domestic services via blue and green bins, we need to make sure that commercial waste is also dealt with in the same manner. Private companies collect general waste from businesses, and there is no guarantee that all waste is sorted following collection. This is something we should follow up as a responsible body.

There should be more local Community Re-cycling facilities, as is evidenced by communities in our neighbours across the North Sea. This should also help to reduce littering, particular in the Town Centre.

The LTC supports the growth of University of Suffolk, East Coast College, and the National Boat College in order to raise skills and qualifications levels in the workforce. Support should include:

- a plan for dormitory student housing for those who are not day students,
- increased public transportation options (there is no direct bus route from south Lowestoft to the campus), and
- encouraging apprenticeships and training links between local businesses and the college.

There is a significant shortfall in provision for young people across Lowestoft (such as skateparks, kickabout areas and youth shelters). The skatepark at Normanston Park is very popular and should be repeated in any new garden estate development in north Lowestoft and in the Kirkley Athletic field area to serve south Lowestoft.

The Council considers that an integrated network of accessible open spaces, sport and recreation facilities is an essential part of the Lowestoft’s infrastructure and character. It provides opportunities for formal and informal recreation and sport, for wildlife to flourish and migrate around the area and for sustainable travel around the town on foot or by cycle.
also improves the townscape, helping to break up and soften the urban area. To this point, the plan should require all developments to contribute to the provision of open space according to the Lowestoft’s standards, identified strategic needs and existing deficits in an area and require major new developments to include on-site public open spaces and wildlife habitat. On-site provision must create a network or corridor with existing green infrastructure where such a network exists beyond the site boundaries.

We have a centuries old example of linking infrastructure in our Scores. There are old, blocked scores that can be reopened and are a part of the Lowestoft Heritage Action Zone. Corridors and pathways for walking and cyclists should be developed along the coast (the East Coast Pathway), north and south through Normanston Park and across Lake Lothing, and east/west from the train stations to the Carlton Marshes.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.22 - Built Community Services and Facilities

Comment ID 1228

Comment 4.5 Built Community Assets (Policy WLP8.22)

We welcome the extension of the protection given to buildings designated as assets to the community to all built community assets in that proposals to change the use of, or develop for a different use, existing built community facilities will only be agreed where it can be shown that there is no community use (including an alternative community use) for that asset.

Attached documents
Richborough Estates Ltd Russell Crow  
Brown & Co (Paul Clarke)  

Section  
Policy WLP8.22 - Built Community Services and Facilities  

Comment ID  
1334  

Comment  
Policy WLP8.22 Built Community Services and Facilities expresses support for the establishment of community facilities which, we believe will eventually form part of the skill centre adjacent to our site. We are supportive of such proposals and will show positive links to it from our proposed residential development.  

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.22 - Built Community Services and Facilities

Comment ID 1606

Comment • Policy WLP8.22 – Built Community Services and Facilities. Paragraph 8.111 states that the 'the listing of an asset does not provide protection against a change of use of redevelopment of the land or building' but this statement is contrary to the wording of policy WLP8.22 which states that proposals to change the use, or redevelop for a different use, a facility registered as an asset of community value will not be permitted. It is appreciated that the policy seems to be seeking strong protection for these assets from changes of use or redevelopment proposals but the policy seems very restrictive and absolute. Could the policy be made slightly more flexible by adding 'unless...' and then having a number of strict criteria which must be fulfilled?

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.22 - Built Community Services and Facilities

Comment ID 1182

Comment We welcome the extension of the protection given to buildings designated as assets to the community to all built community assets in that proposals to change the use of, or develop for a different use, existing built community facilities will only be agreed where it can be shown that there is no community use (including an alternative community use) for that asset.

Attached documents
Southwold Town Council Lesley Beevor

Section
Policy WLP8.22 - Built Community Services and Facilities

Comment ID
1570

Comment
The campaign to retain Southwold Hospital for the community has highlighted a number of issues.

1) There is a need to define community facilities more broadly, to cover a wide range of uses including local shops that serve the community.

2) There is strong support to resist change of use for community assets that result in substantial increases in land value, so that uses that promote regeneration. In addition, the Policy should to be flexible enough to allow what is happening with the Southwold Hospital site, whereby part of the existing site is being redeveloped for community uses that are different from the original use.

3) Finally, there should be a Policy that encourages the recycling of assets of community value, or other community facilities, for affordable housing and/or affordable start-up business space.

Attached documents
Theatres Trust Tom Clarke

Section                                  Policy WLP8.22 - Built Community Services and Facilities

Comment ID                               629

Comment                                  The Theatres Trust welcomes and supports Policy WLP8.22 - Built Community Services and Facilities.

It clearly promotes and safeguards community and cultural facilities and therefore reflects guidance in Para 70 and 156 of the NPPF.
Policy WLP8.23 - Protection of Open Space

Barry Shimmield

Section Policy WLP8.23 - Protection of Open Space

Comment ID 1365

Comment

This is a personal statement but as I am Secretary of the Gunton Woodland Community Project and a member of Gunton Park Residents Association I will pass on your response to them so that you may get an official comment from these two organisations.

Reference the Section "Strategic Planning Policies", the wording of Policy WLP8.23 together with paragraphs 8.116 to 8.120, all the areas shown as "Open Spaces" on the Policies Map are afforded a high level of protection. Development would only be permitted in exceptional circumstances and any prospective application for development would have to satisfy such stringent conditions that it is unlikely to succeed. Development would only be considered if it added to the open space or replaced it with an equivalent or better provision or if the applicant could prove that the open space was surplus to requirements. It is true that the National Planning Policy Framework of 2012, paragraphs 76 and 77, does provide for yet another category known as "Local Green Space" which has an even higher level of protection. But these are very special locations and paragraph 76 of the Framework makes it clear that .... they should only be designated when Local and Neighbourhood Plans are being prepared or reviewed by local communities.

Our local Councillor(s) have now raised the spectre that Open Spaces such as the North Denes, the net drying rack area, the green belt behind Gainsborough Drive and the area that connects Foxburrow Wood to Gunton Church Lane are all under possible threat because they do not have this classification "Local Green Space".

Clearly it is impractical to contemplate Neighbourhood Plans that would cover every significant Open Space but this should not be necessary anyway because, in my opinion, the Open Space protection Policy WLP8.23 should provide adequate protection. However, for extra safety, it would be
possible to reinforce this by considering the addition of one further clause to the 3 existing conditions ....

Proposals for the development of Open Spaces will only be permitted where ....

* After a full public consultation it was supported by a majority of the general public.

Your comments on this suggestion would be appreciated.

Attached documents
<table>
<thead>
<tr>
<th><strong>Section</strong></th>
<th>Policy WLP8.23 - Protection of Open Space</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comment ID</strong></td>
<td>482</td>
</tr>
<tr>
<td><strong>Comment</strong></td>
<td>8.118. Might be worth explaining that open space which has been assessed as part of the Assessment, which is located in the Broads Authority Executive Area of Waveney has been protected through the Broads Local Plan.</td>
</tr>
</tbody>
</table>

**Attached documents**
Dr P R and Mrs A Winslade

Section Policy WLP8.23 - Protection of Open Space

Comment ID 103

Comment We note Section 8.120 and your stated intent to encourage Parish and Town Councils to consider designating Green areas which are demonstrably important to them as Local Green Spaces in Neighbourhood Plans.

With this in mind we would like you to encourage Lowestoft Town Council to designate the following area as Local Green Space:-

The North Denes, from Links Road in the North to the Northern Boundary of the East of England park (as defined in your maps on page 47 and also page 82 of your map book) excluding the current Tingdene Caravan Park.

We feel it meets the criteria of the National Policy Planning Framework, i.e.:-

It is in close proximity to the community it serves, is local in character and is not an extensive tract of land.

It is an area of natural beauty (particularly if tidied up) acting as a lovely foreground to N. Lowestoft. It has considerable historical significance (as early as the 14th century the Denes constituted the largest of the town areas of Common Land) and the bulk of it was sold to Lowestoft, under special and very favourable terms, by Mr Colman, for recreational use by the people of Lowestoft.

It acts as a wildlife corridor, is frequently used as a 'resting' place for migrating birds, is very popular with ornithologists and is used daily by many people for general exercise, pleasure and dog walking.

(Please note that this submission replaces our previous one submitted earlier today, where we were cut short as your system logged us out due to period of 'inactivity' of less than 5 minutes!!!!)
Attached documents
Environment Agency

Section Policy WLP.23 - Protection of Open Space

Comment ID 883

Comment This policy is fully supported. We welcome the acknowledgement of the importance of gardens and other privately owned green spaces. These can provide havens and interconnecting corridors for wildlife and contribute to the character and quality of the local environment.

Attached documents
Jim Gwyther

Section

Policy WLP8.23 - Protection of Open Space

Comment ID

266

Comment

In Section 8.120 you state your intention to encourage Parish and Town Councils to consider designating green areas which are demonstrably important to them as Local Green Spaces in Neighbourhood Plans.

With this in mind I would like you to encourage Lowestoft Town Council to designate the following area as Local Green Space:-

The North Denes from Links Road in the north down to the northern boundary of the East of England Park (as defined in your maps on page 47 and also page 82 of the map book) excluding the current Tingdene Caravan Park.

I feel it meets the criteria of the National Planning Policy Framework.

It is in close proximity of the community it serves, is local in character and is not an extensive tract of land

It is an area of natural beauty (particularly if tidied up) acting as a lovely foreground to North Lowestoft. It has considerable historical significance and the bulk of the North Denes north of the Caravan Park was sold to Lowestoft under special and favourable terms, with funding from Jeremiah James Colman for recreational use by the people of Lowestoft.

It also acts as a wildlife corridor, is frequently a "resting place" for migrating birds, is very popular with ornithologists and is used daily by many people for general exercise, pleasure and dog walking

Attached documents
Peter Eyres

Section  
Policy WLP8.23 - Protection of Open Space

Comment ID  
1068

Comment  
My comment about fig. 7 applies (your ref. 825): the actual North Denes area (from Links Road to the caravan site and the western side of the caravan site) should be protected as open space in accordance with policy WLP8.23 for the reasons I stated above. However, the suggestion that the open space would be better defended in a "Neighbourhood Plan" drawn up by Lowestoft Town Council is not realistic at this stage, as it will be a long time before LTC is firmly on its feet and perhaps years before it is on a sound enough footing to carry out as mammoth a task as a Neighbourhood Plan for Lowestoft, which covers perhaps half the population of the district. Therefore it will be up to the planning department to defend the open space in accordance with this policy and the Note on Implementation.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Policy WLP8.23 - Protection of Open Space

Comment ID 1335

Comment Policy WLP8.23 Protection of Open Space. Open spaces and links to recreational areas and sports pitches are an important element of our proposals. We would support and assist proposals to create open space and playing fields as part of this allocation. This will include assisting in bringing forward a proportion of their sports fields with compensatory and improved facilities brought forward to the south of our residential proposals.

Attached documents
Sport England Philip Raiswell

Section Policy WLP8.23 - Protection of Open Space

Comment ID 741

Comment Sport England supports this policy as it seeks to protect open space, including sport and recreation facilities. The exception criteria for the policy are similar to Sport England’s own policy relating to playing fields and NPPF Paras 73-74.

Attached documents
## Climate Change

**Lowestoft Town Council Shona Bendix**

<table>
<thead>
<tr>
<th>Section</th>
<th>Climate Change</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1301</td>
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</table>
| Comment   | Open spaces can perform more than one function. An important role for some open spaces (such as Leath Ham, Fens, the Denes and Kirkley Ham) will be to act as flood water storage areas or flood paths. Flood risk assessments should where possible and appropriate, identify low areas at risk of flooding as flood management assets and keep them open.  

It is imperative that any deliberate and man-made breaches of flood defences be reassessed to evaluate any new risks associated with floods, sea level rising, and tidal surges.  

We need to take a lead on Green issues. As well as WDC providing individual domestic services via blue and green bins, we need to make sure that commercial waste is also dealt with in the same manner. Private companies collect general waste from businesses, and there is no guarantee that all waste is sorted following collection. This is something we should follow up as a responsible body. |

**Attached documents**
Marine Management Organisation Stacey Clarke

Section Climate Change

Comment ID 59

Comment I would like to suggest areas where further in-depth references in a similar style could be made to the marine plans to more holistically consider them in this local plan:

- Where climate change and erosion are referred to reference could be made to East Marine Plan policy CC1 which looks to ensure proposals take account of climate change in their design and how they will reduce impacts on climate change adaptation methods elsewhere eg on coastal management measures in place

Attached documents
Watts

Section      Climate Change

Comment ID  259

Comment      I believe that climate change is real, is happening and is probably accelerating. Unfortunately, it looks like mankind will be unable to reverse this process. It is therefore important that ALL planning decisions always include solutions that will both acknowledge the future problems and alleviate the consequences of climate change as much as possible e.g. why allow developments that increase the likelihood of flooding instead of trying to reduce it. Developers must be made to cover the current and future costs of climate change problems on their developments.

Attached documents
Policy WLP8.24 - Flood Risk

Anglian Water Services Limited Stewart Patience

Section                   Policy WLP8.24 - Flood Risk

Comment ID                1357

Comment                   Policy WLP8.24 refers to assessing the risk of flooding from all sources but is focused on flood zones identified by the Environment Agency. It is assumed that flood risk from sewers and surface water will be considered in the context of this policy and policy WLP1.4 (Infrastructure) and WLP8.29 (Design).

We do not have any specific comments on this policy subject to our other suggested changes to the Local Plan policies set out above.
Benacre Estates Company Edward Vere Nicoll  
Savills (UK) Ltd (Rosanna Metcalfe)

Section  
Policy WLP8.24 - Flood Risk

Comment ID  
1131

Comment  
Although we are in support of this Policy, we think we should not specifically comment on it, given that the residential allocations in Wrentham are close to or within flood risk areas.

Attached documents
### Bourne Leisure Ltd (Lichfields) -
**Lichfields (Sian Davies)**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.24 - Flood Risk</th>
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**Comment ID** 1484

**Comment** Bourne Leisure considers that Policy WLP8.24 should refer to the exception that is applied to existing tourism accommodation and holiday parks within flood risk areas. Paragraph 102 of the NPPF in effect requires that only the extent of proposed new development itself, within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.

**Attached documents**
Broads Authority Natalie Beal

Section Policy WLP8.24 - Flood Risk

Comment ID 484

Comment 8.128 I understand from the EA that Waveney is also affected by the BESL model issue. At the time of writing, I had not seen the draft SFRA for Waveney DC. How is the gap in modelling going to be addressed? Please see our agreed Position Statement with the EA here which may be of interest to you: http://www.broads-authority.gov.uk/__data/assets/pdf_file/0011/958286/SFRA-Position-Statement-9-May-2017.pdf

Attached documents
Environment Agency

Section  Policy WLP8.24 - Flood Risk

Comment ID  884

Comment  We broadly agree and support the flood risk policy. However, Paragraph 8.126, states that "Since the publication of the 2008 Strategic Flood Risk Assessment, new flooding models have been prepared by the Environment Agency. As such the Strategic Flood Risk Assessment is now being updated to get the most up to date understanding of risk." It should be noted that new modelling is also being undertaken by Waveney District Council and other Risk Management Authorities too.

We feel the policy should also contain information in regards to environmental permitting. Under the Environmental Permitting Regulations (England and Wales) 2016 if you wish to do work in, under, over or within 8 metres of any fluvial main river, flood defence structure or culvert and within 16m of any tidal main river, flood defence structure or culvert you may require an environmental permit for flood risk activities. You may also need a permit for works on the floodplain beyond the 8/16m distance if you wish to do work that is likely to divert or obstruct floodwaters, damage any river control works or affect drainage. This permit is in addition to planning permission.

Attached documents
Forestry Commission Steve Scott

Section  Policy WLP8.24 - Flood Risk

Comment ID  1516

Comment  Flood risk

The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.24 - Flood Risk

Comment ID 967

Comment Section 10 of the Framework provides national policy on factors including flood risk. As currently drafted, Policy WLP8.24 seeks to restrict development in areas of flood risk in a manner that is inconsistent with national policy.

Attached documents
Halesworth Town Council N Rees

Section  Policy WLP8.24 - Flood Risk

Comment ID  1351

Comment  Flooding, after heavy rainfall, is becoming an increasing problem in Halesworth, particularly at the northern end of the shopping street, The Thoroughfare. Natural control measures to slow the flow of flood waters in streams to the west of Halesworth need to be constructed.

Attached documents
Lowestoft Town Council Shona Bendix

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.24 - Flood Risk</th>
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<tr>
<th>Comment ID</th>
<th>1311</th>
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</table>

**Comment**

(Policy WLP8.24 on page 225)

Problem...8.129 The policy says that there will be no building on flood plains except when we think we need to. The exception is so broad it essentially renders the denial of building toothless. The proposal to build housing on the Sanyo/Jen Wen site puts almost all of the proposed housing and a school in a Level 3 flood zone (the worst and most likely to flood classification).


**Attached documents**
River Waveney Trust Andrew Mackney

Section Policy WLP8.24 - Flood Risk

Comment ID 1748

Comment The Trust is disappointed that this recognition of water and river-related issues is not always reflected in policies. We recognize that the Broads Authority is the planning authority for the river itself within the District, but development in the catchment beyond the Broads Authority area has a direct bearing on the river’s health.

Overall, we think the draft Plan should take a more positive attitude to enhancing water and drainage issues, and to promoting biodiversity. Consideration should be given to including policies 'SWM4 – Water Quality Improvements' and 'ECO1 – Biodiversity Enhancement' suggested in AECOM’s Water Cycle Study, into the Local Plan. (Relevant Water Cycle Study policies are referenced at the end of the email.)

WATER CYCLE STUDY

Recommended policies referred to in the text:

SWM4 – Water Quality Improvements

Developers should ensure, where possible, that discharges of surface water are designed to deliver water quality improvements in the receiving watercourse or aquifer where possible to help meet the objectives of the WFD.

ECO1 – Biodiversity Enhancement

It is recommended that Waveney District Council include a policy within its Local Plan which commits to seeking and securing (through planning permissions etc.) enhancements to aquatic biodiversity in the District through the use of SuDS (subject to appropriate project-level studies to confirm feasibility including environmental risk and discussion with relevant authorities).
Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.24 - Flood Risk

Comment ID 1607

Comment • Policy WLP8.24 – Flood Risk. Paragraph 8.126 – South Norfolk Council is pleased that the 2008 Strategic Flood Risk Assessment is currently being updated to get the most up to date understanding of risk and this evidence will be important to inform the final Plan. A Norfolk SFRA (excluding Breckland district) is likely to be finalised in the next month or two, and East Suffolk Council will need to have some regard to this, especially along the Waveney valley.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP8.24 - Flood Risk

Comment ID  1662

Comment  The Lowestoft Flood Risk Management Strategy identifies the need to reduce the impermeable area in the Kirkley Stream catchment. It is not possible to retrofit sustainable drainage measures across the catchment, so the County Council would welcome a discussion on policy measures to require (or at least encourage) higher standards in respect of surface water run off within the Kirkley Stream catchment.

Attached documents
Tim Basey-Fisher

Section  Policy WLP8.24 - Flood Risk

Comment ID  782

Comment  The Policy replicates policies in the National Planning Policy Framework, and does not need to be repeated.

Required Change: 
The Policy should be amended to delete elements that replicate NPPF Policy.

Attached documents
Watts

Section  Policy WLP8.24 - Flood Risk

Comment ID  260

Comment  I can understand the reasoning behind restricting developments within flood zones. However, what if a development outside a flood zone indirectly causes a flood risk within an area in close proximity to that development? As mentioned in my previous comments about flood risk areas in Halesworth and Holton, if you build on water catchment areas on high ground, the water will obviously try to move downhill (as all water is constantly trying to find its way back to the sea!). This can affect flood prone areas on lower ground.

Attached documents
Policy WLP8.25 - Coastal Change Management Area

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 1132

Comment The Benacre Company note that the Policy is inline and supportive of the Shoreline Management Plan currently in existence.

Attached documents
**Environment Agency**

**Section** Policy WLP8.25 - Coastal Change Management Area

**Comment ID** 885

**Comment**

We endorse the inclusion of a coastal change section within the Local Plan and support the recognition that coastal change impacts upon coastal communities, the local economy, the natural environment and infrastructure of the area.

Paragraph 8.131 states 'The National Planning Policy Framework states that Local Plans should reduce the risk from coastal change by restricting inappropriate development in vulnerable areas or development which causes detrimental physical changes to the coast.' Restricting inappropriate development is critical, however, there is also a need to promote adaptation to change within areas subject to erosion. Particularly with regards to the diversification of businesses, such as diminishing arable farms, or within rural coastal communities within managed realignment or no active intervention frontages where the coastline may change. It is important that this need is reflected within local planning policies that actively promote adaptation within Coastal Change Management Areas (CCMAs).

Paragraph 8.131 goes on to state 'The Framework states that Local Plans should be clear as to what development will be appropriate in the Coastal Change Management Areas and in what circumstances. The National Planning Practice Guidance states that residential development will not be appropriate within a Coastal Change Management Area but some commercial and community development may be appropriate with the area depending on the level of risk and the sustainability of the proposals.' Within a managed realignment or no active intervention frontage it is important that development proposals have the opportunity to demonstrate wider benefits, through a sustainability appraisal or similar, when compared to the 'do nothing' scenario associated with no development. For example, rural properties in coastal change areas can be affected by blight, subject to crime and require costly demolition. An opportunity to develop a more suitable land use or construct a moveable
We support the development of a Coastal Change Supplementary Planning Document and recommend the inclusion of an adaptation section to assist landowners.

Policy WLP8.25 indicates that the Coastal Change Management Area is identified on the Policies Map. It is important that there is facility to update this map regularly in accordance with coastal change, although we do recognise the challenge in the implementation of this. A digital, GIS based map provides an ideal resource.

The policy highlights acceptable development within the CCMAs; within the 20 year time horizon, only temporary development directly related to the coast, such as beach huts, cafes, car parks and sites used for touring caravan and camping will be permitted. Whereas beyond the 20 year time horizon, other commercial and community uses will be permitted providing...
they require a coastal location and provide economic and social benefits to the local community. Do these policies give sufficient scope for diversification for landowners on managed realignment or no active intervention frontages? If wider benefits can be demonstrated when compared to a ‘do nothing’ scenario then should other land uses be considered both within and beyond the 20 year zone? In addition, essential infrastructure will only be permitted within a CCMA where no other sites outside of the CCMA are feasible. If a management plan is in place to manage the removal and replacement of such infrastructure then its implementation to facilitate regeneration or prevent blight could be considered.

We support the statement 'Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan and there will be no material adverse impact on the environment.'

We welcome the inclusion of the reference to the community of Easton Bavents within paragraph 8.139 and recommend that anticipatory adaptation proposals (e.g. action prior to demolition or before the point a business becomes unsustainable) within areas of imminent risk are considered in the context of immediate facilitative action required to help prevent the negative consequences associated with more reactionary measures.

Paragraph 8.142 states 'In order to maintain the sustainability of coastal settlements, relocation should take place close to the existing community.' Relocation close to the existing community is often difficult for various reasons; appropriate land may not be available, consents must be obtained, the landowner will expect a return on the site and like for like development is rarely possible. Therefore, there could be scope to extend this principle elsewhere within the district, if local land is unavailable or purchase not feasible. We support the concept that the existing site is either cleared and made safe or put to a temporary use beneficial to the local community.

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 1170

Comment Other matters of particular strategic cross-boundary importance for the Borough Council are considered to be adequately addressed in the Waveney draft local plan. These include including meeting your objectively assessed housing needs and the approach to coastal change management (policy ref. WLP8.25).

Attached documents
Marine Management Organisation Stacey Clarke

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 60

Comment I would like to suggest areas where further in-depth references in a similar style could be made to the marine plans to more holistically consider them in this local plan:

- Where climate change and erosion are referred to reference could be made to East Marine Plan policy CC1 which looks to ensure proposals take account of climate change in their design and how they will reduce impacts on climate change adaptation methods elsewhere eg on coastal management measures in place.

Attached documents
Natural England -

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 1573

Comment The Natural Coast

We note and support the inclusion of policies for coastal change in the plan. We also note that Waveney District supports some of the most natural and scenic undeveloped coasts in England. This is recognised in designations including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, the Heritage Coast, and the Suffolk Coast National Nature Reserve. NPPF paragraph 114. states that; 'LPAs should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast'...We recommend that the plan includes policy wording to maintain the character of the undeveloped coast and protect and enhance its distinctive landscape and seascape.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 1229

Comment 4.6 Coastal Change Management Area (Policy WLP8.25) and Relocation and Replacement of Development Affected by Erosion (Policy WLP8.26)

We support these policies to prevent development in the coastal areas liable to erosion and to allow for some support in securing planning permission to replace properties at risk from erosion.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.25 - Coastal Change Management Area

Comment ID 1183

Comment We support these policies to prevent development in the coastal areas liable to erosion and allow for some support in securing planning permission to replace properties at risk from erosion.

Attached documents
<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.25 - Coastal Change Management Area</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1086</td>
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<tr>
<td>Comment</td>
<td>WLP 8.25 – No dwellings to be allowed in these areas, including presumably 52 week per year occupancy of caravans in such areas?</td>
</tr>
<tr>
<td>Attached documents</td>
<td></td>
</tr>
</tbody>
</table>
Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Benacre Estates Company Edward Vere Nicoll
Savills (UK) Ltd (Rosanna Metcalfe)

Section  Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Comment ID  1133

Comment  The Benacre Company is likely to have property affected, both agricultural and residential, by coastal erosion and therefore the relocation/replacement of dwellings and buildings is likely to be very relevant. We are specifically concerned about the condition for relocation of replacement dwellings to be relocated adjacent to an existing settlement. The Benacre Company would like to see the Policy broadened to allow existing residential dwellings located away from existing settlements to be replaced in a similar location outside of the CCMA. We specifically give examples of working farmhouses and farmyards located within the CCMA and at risk of erosion. We do not feel it is appropriate for such a dwelling and business location to be relocated adjacent to an existing settlement. It would be most appropriate for a replacement farmhouse and farmyard, including buildings, to be located further inland but on the same farm.

We also site examples of individual dwelling houses built in isolation but currently benefiting from services and see no reason why these properties, should they be lost to coastal erosion, could not be replaced in alternative sites within the ownership, assuming services and transport links etc. are no worse than that of the existing site.

Some of The Benacre Company's properties which are likely to be lost to coastal erosion are significant detached properties which we feel would be most appropriately replicated away from an existing settlement.
Attached documents
Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section
Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Comment ID
1486

Comment
The Company supports the principle of Policy WLP8.26, in that it accords with national Planning Practice Guidance (Flood Risk and Coastal Change) which encourages local planning authorities to take account of existing settlements and requirements for facilitating roll-back and the relocation of land uses. However, Bourne Leisure is concerned that the Policy, as drafted, could restrict the identification of roll-back locations for sites such as Corton Coastal Village, which is located in a seafront location within the Corton Settlement (and therefore not considered to be in the countryside). The following amendment is therefore requested to the third criterion:

'The new development is in a location that is accessible to the coastal community from which it was displaced or otherwise meets the needs generated by its use'

Attached documents
Laura Martin

**Section**  
Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

**Comment ID**  
1064

**Comment**  
I am commenting on this as one of the Easton Bavents residents who has already lost her home to the sea, and would therefore be eligible for one of the reserved plots.

My view is generally in favour of the proposal for the new development area, but whether I take up the offer or not would depend on a number of details. Firstly I would wish the plot to be the same size as the one I lost. Secondly it needs to be affordable, people who've lost a property tend not to have much spare cash. Thirdly I would hope the plot would come with no restrictions as to use (apart from the usual planning regs) and no restrictions as to future disposal.

I hope this is clear but please get in touch if clarification is needed.

**Attached documents**
Natural England -

Section: Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Comment ID: 1574

Comment: The Natural Coast

We note and support the inclusion of policies for coastal change in the plan. We also note that Waveney District supports some of the most natural and scenic undeveloped coasts in England. This is recognised in designations including the Suffolk Coast and Heaths Area of Outstanding Natural Beauty, the Heritage Coast, and the Suffolk Coast National Nature Reserve. NPPF paragraph 114. states that; 'LPAs should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast'...We recommend that the plan includes policy wording to maintain the character of the undeveloped coast and protect and enhance its distinctive landscape and sea scape.

Attached documents
Reydon Parish Council Jean Brown

Section  Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Comment ID  1230

Comment  4.6 Coastal Change Management Area (Policy WLP8.25) and Relocation and Replacement of Development Affected by Erosion (Policy WLP8.26)

We support these policies to prevent development in the coastal areas liable to erosion and to allow for some support in securing planning permission to replace properties at risk from erosion.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.26 - Relocation and Replacement of Development Affected by Coastal Erosion

Comment ID 1184

Comment We support these policies to prevent development in the coastal areas liable to erosion and allow for some support in securing planning permission to replace properties at risk from erosion.

Attached documents
Policy WLP8.27 - Renewable and Low Carbon Energy

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID 1487

Comment The Draft Local Plan identifies the offshore/renewable sector to be an area for potential future jobs/growth in the District (Section 1, Overall Spatial Strategy, Page 14). Bourne Leisure endorses this approach to supporting the local economy, but requests that it is made clear in the pre-submission Local Plan that acting on this potential for growth should not come at the expense of any potentially harmful impacts on existing industries such as tourism.

Paragraph 97 of the NPPF states that local planning authorities should:

'...design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.'

The approach in the District’s Local Plan should, therefore, be to consider the potential effects of renewable energy proposals on sensitive receptors such as holiday accommodation sites. The Company supports the statement at supporting paragraph 8.146 of the Draft Local Plan which recognises that renewable energy developments can have significant negative effects on biodiversity, heritage and landscape and also the amenity of residents and workers. However, the Company requests the following amendment to ensure the text fully acknowledges the important relationship between the quality of the natural environment, the role of tourism, and its contribution to the local economy:

'Renewable and low carbon energy developments can also have an effect on amenity of residents, visitors and workers nearby through noise, smell, shadow flicker and glare'.

It is, therefore, vitally important that any neighbourhood plan policies, and
proposals, for renewable energy development should be drafted/determined with a balanced and pragmatic approach to ensuring that the tourism industry, and in turn, the local and regional economy are not harmed. Draft Policy WLP.27 should be amended accordingly, to ensure that it fully aligns with national policy:

'Renewable and low carbon energy schemes will be permitted where:

There are no significant adverse effects on the amenities of nearby properties or the tourism/visitor industry, there are no adverse safety impacts and no significant adverse effects on the transport network; or..'
Broads Authority Natalie Beal

Section Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID 485

Comment Page 231, Policy WLP8.27 - Renewable and Low Carbon Energy. Please refer to the Broads' Landscape Sensitivity Study here. Please mention impact on landscape outside of the Waveney DC Local Plan area. We make these comments with the appeal for a wind turbine Ringsfield a few years ago in mind. The supporting text for the policy may cross refer to other policies, but the first bullet point includes some considerations that are in other policies of the Local Plan and adding landscape character impact outside of the Waveney area seems prudent.

Attached documents
Forestry Commission Steve Scott

Section Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID 1515

Comment Renewable & low carbon energy

The resilience of existing and new woodland is a key theme of the Forestry Commission's work to Protect, Improve and Expand woodland in England. We will continue to work with Forestry / Woodland owners, agents, contractors and other stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.

Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

Attached documents
Historic England

Section
Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID
1400

Comment
We welcome the supporting text identifying the policies on landscape and the historic environment as important considerations. However, we recommend that a specific policy on renewables should cover the inclusion of renewable technologies within Conservation Areas and with regard to historic buildings and the wider historic landscape. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings

https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ to be helpful in understanding these special considerations.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID 1302

Comment Given the acknowledged vulnerability of the region to the effects of climate change and the projected levels of development Lowestoft will be required to accommodate, the LTC considers it reasonable to require new developments to provide a minimum of 15% of energy demand to be sourced from renewable or low carbon sources such as solar roofs, passive heating and cooling, and any other sustainable energy technology.

The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved and/or the introduction of additional energy efficiency measures (i.e. additional to those required under the relevant Code for Sustainable Homes or BREEAM requirements) to achieve an equivalent reduction in carbon emissions.

Attached documents
Suffolk Preservation Society Fiona Cairns

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.27 - Renewable and Low Carbon Energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>703</td>
</tr>
<tr>
<td>Comment</td>
<td>The Society recommends that the supporting text to this policy includes reference to design policy WLP8.29. Design issues can apply equally to renewable energy proposals. Omitting reference to that policy in para 8.146 might suggest otherwise to planning agents and/or their clients.</td>
</tr>
</tbody>
</table>

Attached documents
Watts

Section  
Policy WLP8.27 - Renewable and Low Carbon Energy

Comment ID 261

Comment  
Suggestion - all new buildings whose use is specified as industrial should have mandatory solar panels fitted to their roofs. The amount of panels (i.e. Energy output) should be based upon the area of roofing. Could this be applied retrospectively to existing industrial units?

Attached documents
Policy WLP8.28 - Sustainable Construction

Anglian Water Services Limited Stewart Patience

Section  Policy WLP8.28 - Sustainable Construction

Comment ID  1358

Comment  It is noted that it is proposed to adopt the higher water efficiency standard for residential development.

We understand that the EA considers that the Anglian Water company area which includes part of Waveney District is located in a water stressed area as defined in the Environment Agency’s maps. Therefore we would support the optional water efficiency standard being applied within Waveney District.

However we do not consider it necessary to include reference to further viability work being required as Government research (The Housing Standards Review Cost Impact report (2014) has shown that the cost of the optional higher water efficiency standard and associated cost can be as low as £6-93 per dwelling. We therefore consider that this does not make the Waveney Local Plan, or individual development proposals, unviable.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.28 - Sustainable Construction

Comment ID 1447

Comment This policy lacks clarity in terms of dwelling numbers, relying instead on the wording major residential development.

For clarity and for the avoidance of argument, it would be helpful if the words "major development" could be replaced with a more definite number. We would suggest that in line with limits elsewhere in your policies, this figure for residential development be defined as sites of over 100. Similarly a floor area figure would be appropriate for commercial development.

Attached documents
Clare Mackney

Section Policy WLP8.28 - Sustainable Construction

Comment ID 732

Comment Growth of housing and jobs is vital but the Plan appears to give priority to accommodating the outcomes of the developer-led site identification process over environmental protection and enhancement. The very few policies relating to the natural environment are concerned with preventing harm and only secondarily seek improvement, and should be worded more positively. For example, the sustainability measures listed in WLP8.28 should be provided other than in 'exceptional circumstances', not just 'where practical'. Simply to 'maintain' green infrastructure and biodiversity (policy WLP8.22) is not enough to warrant supporting a proposal and the term should be dropped so that the policy always seeks restoration and enhancement.

Attached documents
Environment Agency

Section Policy WLP8.28 - Sustainable Construction

Comment ID 886

Comment We welcome this policy and in particular support to sustainable management of water in both construction and in the finished designs of buildings. In particular we would support the use of SuDS, green roofs and other rainwater harvesting systems that are included in the policy. These can all play a role in effective water use and enhance green infrastructure. Larger developments or certain types of industrial developments may require abstraction permits and this should be incorporated into the policy. More information can be found at https://www.gov.uk/topic/environmental-management/water

We also support the minimising of construction waste in development, we feel this could be strengthen in the supporting text. We believe waste should be 'designed out' as part of the design stage of development. It should be clear how the waste hierarchy will be followed during development and how in the buildings' design, its construction, and during its operation the applicant will be aiming for the top of the hierarchy wherever possible. Compliance with the waste hierarchy is a legal obligation. More information can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Material that is disposed of may also require developers to apply for an environmental permit. The transportation of waste soils can be a factor in the spreading of invasive species and this should be considered by developers.
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.28 - Sustainable Construction

Comment ID 968

Comment Gladman would wish to raise initial concerns at this stage with regard to the intention to require optional technical standards for new residential development in the absence of robust evidence to justify its introduction. If the Council wishes to adopt these standards they must be fully justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. Care should be taken to ensure that generic arguments are avoided. It is incumbent on the Council to provide a local assessment evidencing the specific case for Waveney which justifies these policy requirements.

Attached documents
<table>
<thead>
<tr>
<th>Halesworth Town Council N Rees</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section</strong></td>
</tr>
<tr>
<td><strong>Comment ID</strong></td>
</tr>
<tr>
<td><strong>Comment</strong></td>
</tr>
</tbody>
</table>

**Attached documents**
Historic England

Section       Policy WLP8.28 - Sustainable Construction

Comment ID   1401

Comment      In addition to our comments above under renewables and low carbon, we would identify that the policy does not set out how it relates to new work to existing buildings.

Attached documents
**Home Builders Federation Mark Behrendt**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.28 - Sustainable Construction</th>
</tr>
</thead>
</table>

**Comment ID** 903

**Comment** Optional building standards

The Council have set out in both policy WLP8.1 and WLP8.28 its intention to apply the optional building standards for access and water efficiency. Planning Practice Guidance requires evidence on both needs and viability before the optional technical standards for housing are implemented and at present there is insufficient evidence on both needs and viability to justify these standards. Until this is undertaken the Council’s polices on these housing standards cannot be considered sound.

**Attached documents**
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section                                     Policy WLP8.28 - Sustainable Construction

Comment ID                                  1467

Comment                                     Sustainable Construction – Object

The Council has set out at Policy WLP8.28 its intention to apply optional building standards for water efficiency. Planning Practice Guidance requires evidence on both needs and viability before the optional technical standards for housing are implemented and at present there is insufficient evidence on both needs and viability to justify these standards. Until this is undertaken the Council’s polices on these housing standards cannot be considered sound.

Attached documents
Peter Eyres

Section Policy WLP8.28 - Sustainable Construction

Comment ID 1100

Comment Yes, secure, enclosed, convenient cycle parking from which it is to reach the public highway is an important aid to encouraging cycling: every obstacle that can be removed helps.

If we are thinking about sustainable construction, when will we turn our attention to recycling human waste? We in the developed world are in the anomalous position of taking two very precious resources, human waste and expensively purified water, and mixing them up to produce a foul and dangerous pollutant which costs us a lot to make safe. The inferior result is reusable to a degree, but in any case urine, arguably the most valuable part, is irretrievably lost. The possibility of saving human waste for composting is hardly a new idea: it just needs to be put into practice, which can most easily happen on new developments.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section  
Policy WLP8.28 - Sustainable Construction

Comment ID  
1337

Comment  
Policy WLP8.28 Sustainable construction. The policy advocates a range of sustainable measures to be incorporated within any major residential or commercial development. Whilst we would agree with the objectives of this policy, there are three elements that are of concern, namely:

* Renewable and low carbon energy generation into the design of new developments. Larger schemes should explore the scope for district heating.

* Promotion of sustainable transport modes including secure and convenient cycle storage and charging points for electric vehicles; and

* A show home demonstrating environmentally sustainable options which can be purchased and installed in homes bought off-plan.

Although the policy is prefaced with the phrase 'where practical' we are concerned that this policy could potentially affect the viability of delivering sites.

Attached documents
River Waveney Trust Andrew Mackney

Section Policy WLP8.28 - Sustainable Construction

Comment ID 913

Comment WLP8.28 Sustainable construction

We welcome the requirement that new residential development should include sustainable water measurement measures and achieve a water efficiency standard of 110 litres/person/day, but consider the requirement should only be waived in exceptional circumstances. Water Cycle Study policy 'SWM3 – SuDs and Water Efficiency' should be incorporated into the Local Plan policy.

WATER CYCLE STUDY

Recommended policies referred to in the text:

SWM3 – SuDs and Water Efficiency

Developers should ensure linkage of SuDS to water efficiency measures where possible, including rainwater harvesting.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP8.28 - Sustainable Construction

Comment ID 1693

Comment The references to minimising waste in construction and providing waste management facilities in Policy WLP8.28 is welcomed.

Attached documents
Tim Basey-Fisher

Section  Policy WLP8.28 - Sustainable Construction

Comment ID  783

Comment  The Policy seeks to put additional burdens on development and is contrary to Ministerial Statements (Pickles 25 March 2015). No evidence is provided demonstrating that meeting these additional burdens is viable.

Required Change:

Delete the Policy.

Attached documents
Design

South Norfolk District Council Adam Nicholls

Section Design

Comment ID 1608

Comment • Paragraph 8.161 – South Norfolk Council is fully supportive of planning for the needs of those with dementia, considering the ageing population and increasingly publicity and awareness of dementia.

Attached documents
Policy WLP8.29 - Design

Anglian Water Services Limited Stewart Patience

Section                           Policy WLP8.29 - Design

Comment ID                        1359

Comment                           Reference is made to developments including Sustainable Drainage Systems (SuDS) to drain surface water.

Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.

As noted in the supporting text for this policy there is a need to ensure that surface water is managed by SuDs rather than discharging to the combined or surface water sewer system.

It is therefore suggested that Policy WLP8.29 could be strengthened by making the following amendment:

* 'Development should use sustainable drainage systems...of the scheme. No surface water connections are made to the foul system and connections to the combined or surface water system are only made in exceptional circumstances where it can be are no feasible alternatives (this applies to new developments and redevelopments). Foul and surface water flows should also be separated where possible.'
Anne Frith

Section Policy WLP8.29 - Design

Comment ID 1745

Comment Who on the project/planning committee is responsible for ensuring that the legal rights of disabled people, under the Disabilities and Equality Act of 2010, to equal, safe, and independent access to all public realms, are implemented?

Who on the project Committee will read this and act to have the interests of all disabled people actively, and effectively, promoted?

Who on the project Committee has read the report of April 2017 of the Parliamentary Equality Commission into the future of the built environment? This Inquiry looked at ways in which public spaces can provide equal access for all so that especially an aging population can independently and safely access shops, libraries, transport links, and social groups. Without safe access to these facilities they conclude that people become increasingly isolated and housebound. That leads to depression and sometimes alcoholism and obesity. Then this section of the public makes frequent demands on the over-stretched medical and welfare services. The summary of the report showed the surprise of the Commission at the large amount of opposition to so-called shared spaces where all road users, pedestrians, cyclists, and all sorts of motor vehicles, are supposed to mingle with priority being established by eye-contact. Apart from the large consulting companies which derive inflated fees from advising on these projects, and the architects with their unrealistic designs, few people could be found to favour an area where there is no distinction between the areas for motor vehicles and pedestrians. The developers too favour flat surfaces and all to share the same surface as this allows more room for financially profitable building.

The Commission recommended that a moratorium should be imposed on all future schemes until the whole subject had been properly examined. Also that it should be easier for members of the public to challenge the decisions of the local authorities on these matters. Without a compliance officer, a disabilities officer, there is no-one at present to safeguard the
interests of disabled people. There is no-one collecting information, a focus for disabled people with concerns, someone responsible for contacting disabled people, and in particular people with sight loss who are most affected by the removal of safe footways, and for collecting information from elsewhere about best practice.

1. In the Journal Colin Noble, leader of the Council, urged district and town councils to begin planning for more than forty percent of the population of Suffolk in the near future being aged over 65, and that a girl born today might live to 100. There are expected to be two and a quarter million people with significant sight loss by 2025. In addition there will be an increasing number of people with mobility problems and mobility scooters. These are not nearly as manoeuvrable as able bodied pedestrians and they too need safe, vehicle-free passage. As do people with dementia, Mothers with small children, and the generally frail and elderly.

In the out of all proportions housing estate planned for Worlingham and South Beccles it is vital that the needs of this growing elderly population be taken fully into consideration at the outset, not just being an add-on.

2. Someone should be appointed immediately to look to the rights, needs, and interests of all disabled people.

The width of roads and footways is of the utmost importance. There should be sufficient width for buses and other necessary large vehicles. There should be wide, pedestrian friendly and vehicle-deterrent footways with substantial kerbs.

Crossing points should be identified and where appropriate audible controlled crossings should be installed. Courtesy crossings, which have no status in law should not be included.

The pro shared-space lobby will say that cars waiting at traffic-lights pollute the atmosphere. In the future cars will be electric so this will not be an issue. Electric cars are silent so safe and audible crossings are more than ever essential.

Those who know well that disabled people, and especially blind people, need safe, vehicle-free, footways will confuse the plans. The widths of the footways will not be stated in the early drafts. Crossings may be indicated but not specified. It will not be clear from the drafts whether the edge of a footway will have a substantial kerb or merely a line or colour contrast.

3. Around the Country local authorities have not been rigorous in
controlling developments. It is discovered too late that roads are not wide enough for buses, that there are no safe footways, that there are no safe crossings in areas where people want to cross.

Developers have swiftly put up a building invading the area which should have been the footway and, because the building is already up and perhaps it is only a meter or two over the agreed building line, the Council does not force the developer to demolish the building and build according to the agreed plan.

A Councillor, in addition to a member of the planning department, should be made responsible for scrutinising the plans, and making frequent unexpected site visits, at every stage, with especial reference to side effects of any plan changes. They must have the power to halt construction until such time as the developer rectifies the situation.

4. It will be said that the stage three safety audit will ensure safety. This is no longer a guarantee of safety for pedestrians. The criteria for these safety audits were drawn up at a time when there was a clear distinction between the roadway and the footway, and, in heavily used areas, a physical barrier or substantial kerb was assumed. The Audit looks at the safety of the roadway, now called the, 'implied,' or, 'inferred,' roadway. The Audit can be carried out eighteen months after the completion of the project and it is apparently common practice for the auditors to be employed by the local authority which has commissioned the project so it would be most surprising if they ordered radical changes.

5. The development, it seems, will be carried out in stages. Again developers around the Country have not fulfilled their agreements. The stages must be very carefully specified and strictly kept. All the most profitable development must not be allowed to take place first for then the developers seem to be able to close down the company and abandon responsibility for the rest of the development, which usually contains all the social provision.

If the developer does not agree to strict planning controls, and a rigorous and enforceable timetable, then go to another developer. The developers with whom you are dealing, looking at their history and developments around the Country, do not inspire confidence in those who might be expected to live in the proposed estate.

I look forward to hearing from you as to whom in the future I should direct my concerns, and who will be actively and effectively safeguarding the rights and needs of all disabled people, and who will have the knowledge to
challenge assertions made by groups who either have no knowledge of the subject, or whose objectives do not include the safety of pedestrians.

Attached documents
Beccles Society Paul Fletcher

Section Policy WLP8.29 - Design

Comment ID 679

Comment

In Policy WLP8.29 – Design – there is a recommendation that innovative design will be supported where it meets the criteria laid down within this Policy note. In this context it might be helpful to state that "developers are encouraged to employ a competent architect to comply with the provisions of this policy so as to produce innovative design".

Currently, the houses being built at the Cucumber Lane junction fail to inspire any confidence in achieving the stated design policy in either their quality of build, density or innovation of design.

It is noted that in Policy 8.29, "Public rights of way are to be maintained and enhanced".

It would be useful if a plan of existing definitive rights of way was made available for the sites from Suffolk County Council Highways Department as an aide memoire for all prospective developers. It should also be a requirement that Waveney D.C. overlay such a plan on the final issue of the Beccles and Worlingham Garden Neighbourhood map.

Attached documents
## Bungay Neighbourhood Development Plan Steering Group Ken Lodge

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.29 - Design</th>
</tr>
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</table>

| Comment ID | 1522 |

| Comment | Housing: the design quality of any new housing should be made the central focus. |

| Attached documents |  |
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.29 - Design

Comment ID 969

Comment It is noted that Policy WLP8.29 proposes to introduce criteria relating to design and that failure to meet the criteria will result in the refusal of planning permission. Any such policy should be positively framed and seek to shape the delivery of new development that responds positively to its wider context by securing appropriate design solutions. There will however be circumstances where a degree of harm could be identified and in such circumstances this would need to be considered in the planning balance in the context of a scheme’s wider sustainability credentials and not necessarily result in the refusal of planning permission. Furthermore, the rigid use of Building for Life 12 in decision making should be avoided within policy as it is not a requirement of national policy.

Attached documents
Halesworth Town Council N Rees

Section       Policy WLP8.29 - Design

Comment ID   1349

Comment       Most houses in the new developments will have two cars but to ensure an uncluttered frontage and open vistas, parking for two vehicles should be designed to be behind the building line. Similarly additional parking should be provided away from the main sightlines.

Attached documents
Historic England

Section Policy WLP8.29 - Design

Comment ID 1402

Comment We welcome the section on design and the identification of the historic environment in paragraph 8.155. We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. Most particularly, we seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design. We note that the natural and built environment are included within the policy but not the historic environment.

We welcome the initial local considerations about what design and density means in Waveney. The supporting text could be further enhanced through locally-specific examples both within this section and in the previous settlement specific strategies and overviews.

Attached documents
Nicky Elliott

Section Policy WLP8.29 - Design

Comment ID 1279

Comment Policy WLP8.29 – Design: I would like to see included in this policy that ALL new buildings should be carbon-neutral and generate their own energy using the latest and most appropriate electricity-generating technology.

Attached documents
Peter Eyres

Section Policy WLP8.29 - Design

Comment ID 1103

Comment New developments in rural areas should respect their locality. A new cul-de-sac should not be built to a higher standard than the more important road from which it takes access. An urban housing layout, complete with kerbs, footways and lighting, sticks out like a sore thumb in a village with grass verges, no footways and only the occasional street light.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.29 - Design

Comment ID 1231

Comment 4.7 Design (Policy 8.29)

This is a long section and wide-ranging policy but open to considerable interpretation. The aims are to ensure that development is in keeping with the surroundings, built and landscape, manages car-parking discreetly, uses appropriate materials, has adequate drainage and meets the Building for Life (sustainability) guide. We would like to see the encouragement of bold modern architecture which is in keeping with the surroundings and avoid endless recreation of a conventional suburban vernacular which, sadly, characterises too much of the built environment in Reydon.

With regard to sustainability, we believe that new buildings should be required to meet the most stringent standards of low carbon use, including the requirement for effective energy conservation and the encouragement of ground source heat pumps, solar energy, storage batteries etc. These provisions need to be applied in conservation areas.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section  Policy WLP8.29 - Design

Comment ID  1339

Comment  Policy WLP8.29 Design. This is a criteria-based policy which identifies the factors that need to be taken into account in designing proposed developments. In submitting an outline planning application for the residential development, it will be supported by a range of technical reports, including a Design & Access statement and a Landscape & Visual Impact Assessment.

Attached documents
River Waveney Trust Andrew Mackney

Section Policy WLP8.29 - Design

Comment ID 915

Comment WLP8.29 Design

We welcome the requirement to use sustainable drainage systems but consider it should be framed more positively; the phrase 'not detract from the design quality of the scheme' could be replaced by 'should be designed and planted to increase biodiversity', or similar.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.29 - Design

Comment ID 1185

Comment This is a long section and wide-ranging policy but open to considerable interpretation. The aims are to ensure that development is in keeping with the surroundings, built and landscape, manages car-parking discreetly, uses appropriate materials, has adequate drainage and meets Building for Life (sustainability) guide. We agree that innovative design should be strongly supported and would like to see the encouragement of bold modern architecture which is in keeping with the surroundings and avoid endless recreation of a conventional suburban vernacular which, sadly, characterises a lot of the built environment in Reydon. We would also like to see specific reference to the Suffolk Design Guide. Further, we would like to see encouragement of low carbon technology (such as appropriately designed solar panels) in conservation areas.

Attached documents
Policy WLP8.29 deals with design and includes a requirement that public safety is considered as a design issue. This, allied to the Building Regulations (Part B), should be sufficient to ensure that fire safety requirements (access and water supply) are considered. However, the Plan could be more positive by including supporting text identifying the need to consider fire safety as a design issue. The following could be added to paragraph 8.159:

8.159 Promoting public safety and discouraging crime and disorder are important outputs of a well designed scheme. Development proposals should incorporate 'Secured by Design' principles and encourage natural surveillance over public areas. Particular care will be required in the design of car parking areas, landscaped areas, public spaces and pedestrian routes in order to avoid creating crime and disorder issues. Development proposals should give early consideration to access by emergency vehicles, plus hard standing and provision of fire hydrants for fire service vehicles. The Suffolk Fire and Rescue Service strongly encourages the provision of automated sprinkler systems.

The Suffolk Fire and Rescue Service strongly encourage consideration of the provision of automated sprinkler systems. Whilst the Building Regulations do not currently require their provision, and it is not the Place of the Local Plan to exceed Building Regulation requirements, every opportunity should be taken to encourage the use of sprinklers.
Suffolk County Council Robert Feakes

Section Policy WLP8.29 - Design

Comment ID 1692

Comment The reference to making provision for bins as a design issues in Policy WLP8.29 is welcomed.
Tim Basey-Fisher

Section  Policy WLP8.29 - Design

Comment ID  784

Comment  The Policy seeks to ensure good design. It sets out a number of criteria against which proposals will be tested and should they fail any of the criteria, the Policy suggests schemes will be removed. However, no guidance is provided to understand how each of the criteria will be applied and tested, and what would constitute a failure or pass. Given the imprecise nature and lack of information on what constitutes a pass of fail, the requirement for proposals to be refused should be removed.

Required Change:

The Policy should be amended to delete the text "...Development proposals which fail to meet the above criteria will be refused planning permission.." or ensure that the Local Plan explains clearly how the planning proposals will be assessed against the criteria and what would constitute a pass or failure.

Attached documents
Policy WLP8.30 - Housing Density and Design

Badger Building (E.Anglia)Ltd Edward Gilder

Section: Policy WLP8.30 - Housing Density and Design

Comment ID: 1448

Comment: We support this policy.

This is a restatement of the current policy which has been applied flexibly and successfully in the past.

Attached documents
Joyce Moseley

Section Policy WLP8.30 - Housing Density and Design

Comment ID 298

Comment [Halesworth] Please ensure housing has high architectural values not like some of the housing around.

Attached documents
Richborough Estates Ltd Russell Crow
Brown & Co (Paul Clarke)

Section Policy WLP8.30 - Housing Density and Design

Comment ID 1340

Comment Policy WLP8.30 Housing Density & Design. This policy advocates a housing density of 30 dwellings per hectare. The policy provides some flexibility under the phrase 'unless Local character indicates otherwise...', and in our view, it is important that a single density is not applied rigidly as there may be many circumstances that justify a change to this density in order to achieve sustainable growth and the efficient use of land.

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section  Policy WLP8.30 - Housing Density and Design

Comment ID  1004

Comment  Draft Policy WLP8.30 Housing Density and Design

4.11 The Somerleyton Estate objects to the policy as currently worded and requests an amendment to the provision within draft policy WLP8.30 that "Neighbourhood Plans can set their own policies for housing density which respond to local circumstances"

4.12 We would request that it is replaced with the following text (new content highlighted in bold):

"Neighbourhood Plans or where relevant Design Briefs in the form of Supplementary Planning Documents can set their own policies for housing density which respond to local circumstances"

4.13 Notwithstanding the above the Somerleyton Estate support the principle of allowing neighbourhood plans to address the issue of development density because in Somerleyton sufficient alternative development sites exist should the community wish to 'spread' the allocation around the village to reduce densities or to help deliver the community facilities required by the residents and District Council alike.

4.14 For clarity policy WLP8.30 should set out the circumstances in which the LPA anticipates that an SPD would be developed in preference to the neighbourhood plan if it appeared that the Somerleyton neighbourhood plan was not advancing. The additional text would allow for circumstances where neighbourhood plans do not progress fast enough to meet the development delivery timescales or are abandoned and would allow the local planning authority, through the SPD, to further develop schemes in response to a specific local context.
Attached documents
Policy WLP8.31 - Residential Gardens and Urban Infilling

Badger Building (E.Anglia)Ltd Edward Gilder

Section  Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID  1449

Comment  We support this policy.

The redevelopment of larger gardens has over the years provided a useful source of housing land we see no reason to curtail this if the policy is carefully applied.

Attached documents
**Broads Authority Natalie Beal**

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.31 - Residential Gardens and Urban Infilling</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>496</td>
</tr>
<tr>
<td>Comment</td>
<td>Policy WLP8.31 – Residential Gardens and Urban Infilling includes a requirement to 'Safeguard protected trees.' As not many trees are protected I would suggest that this might be widened to safeguard any trees with landscape, amenity or biodiversity value.</td>
</tr>
</tbody>
</table>

**Attached documents**
D J Turrell

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 101

Comment Policy WLP8.31, would it not be better to word this policy, Housing development on greenfield gardens in urban locations will be discouraged unless it meets every condition, and has support of local residents, your old policy H9 which was replaced by DM02 worded this so planners and committee members had a policy to use to refuse planning in tandem back gardens, which developers were aware of and so did not try to buy and built on such locations.

In my opinion you need a strong urban greenfield policy as your policy WLP1.2 alone would give developers an open case to build in most locations and your planning officers hands would be tied to refuse such applications

Attached documents
Historic England

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 1403

Comment In policy WLP8.31 we would suggest a small deletion: "...into the surrounding built, natural, and where necessary historic environment." As currently drafted it could imply that the historic environment is only those designated assets and, therefore, does not always apply as a consideration although the same could be argued about the natural environment too in this circumstance.

Attached documents
Lowestoft Town Council Shona Bendix

Section  Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID  1290

Comment  Infill and residential gardens page 240, Policy WLP8.31, WLP 8.32

The Council considers that, in addition to the provision of well-planned public spaces, the provision of high quality private outdoor amenity space for all types of new residential development must be considered to be an essential component of high quality design, and key to the creation of a sustainable residential environment both in terms of its contribution to liveability and to urban greening and the preservation and/or enhancement of local biodiversity.

Such space is needed for sitting out, socialising, play, drying washing, and gardening (flowers and food). Infill of new housing into residential gardens should be discouraged and the minimum size of the remaining garden (where infill is permitted) should be spelled out in policy.

In developing 1,000 to 1,500 additional dwellings scattered inside an existing town, the infrastructure requirements are likely to be significant and include new and improved roads and green routes, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools or school additions, new recreation provision, new healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing homes in the area and help to sustain them. The proper planning and delivery of this infrastructure will be the result of a comprehensive approach to development in the area. It cannot be assumed that new housing on infill and brownfield does not come without cost to the existing neighbourhood. As houses are added, the overall "load" on existing infrastructure, schools, roads, etc. must be reassessed and adjusted.

We do not see in the present draft plan accommodations made for the increased stress on roads, schools, healthcare, etc. on infill and the smaller brownfield sites.
Proposals for small scale residential development involving infill, backland or severance plots will not be permitted unless the development:

* is sited in a location where it would not be disturbed by other land uses;
* establishes a safe and secure environment;
* protects the setting of existing buildings and the character and appearance of the area;
* protects the amenity of neighbouring residents, particularly in terms of loss of privacy or light, or overbearing impact;
* has safe and convenient access; and
* has secure and lit bicycle storage and facilities for the storage of refuse, recycling and garden waste containers.

The tight boundary around Lowestoft means that small sites, such as backland plots behind existing dwellings, have historically been an important source of additional dwellings for the town. However, given the nature of such sites often close to existing housing, new development needs to be carefully controlled in order to protect the character and amenity of the neighbourhood and the quality of life of its inhabitants.

In the case of severance plots, it is important that the original dwelling(s) shall retain sufficient garden space to meet the Council's minimum standards. "Terracing" or the filling of spaces between semi-detached or detached houses will be avoided, especially when the new build blocks off access to the back gardens and avoiding tandem development.

Filling front existing gardens and dropping an existing curb to create car parking and access will not be allowed. Front gardens turned into parking lots remove a spot for on-street parking for the public when curbs are dropped so that cars can enter the front garden parking space. Paving over a garden increases street water run-off and decrease bio-diversity. Front gardens filled with cars degrades the streetscape and neighbourhood sociability.

In recent years there has been significant pressure, particularly in central locations in our conservation districts, to convert existing houses into flats, bedsits and houses in multiple occupation. It is also important to note that not all shared accommodation will trigger the need for planning permission. However, where planning permission is required it is considered important to ensure that such development takes place in an appropriate form and

www.eastsuffolk.gov.uk/newwaveneylocalplan
location. In particular it is considered important to have regard to amenity and also to prevent the conversion of small and modest sized family housing. All houses converted to multiple occupancy will need to have outside space, off-street bin storage, bicycle/mobility scooter storage and parking all considered as part of the application.

Green roofs and rainwater harvesting schemes important as stated in policy along with renewable and low carbon energy so why aren’t solar panels required in a percentage of non-conservation area new-builds? We should be supporting the inclusion of solar panels in all new-build properties, whether partial or whole buildings, when considering planning applications.

Attached documents
Norman Castleton

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 428

Comment Residential Gardens and Urban Infilling: I think something needs to be mentioned here about the threat from flooding and the need for local soak-away drains in addition to the installed surface water drains/sewer systems. Gardens and other cultivated areas act to drain away surface water from heavy rains or water course overflows. If gardens or green areas close to housing are hard cored over with buildings or paving then the water cannot soak away thus causing or acerbating flooding. I thought that a stipulation banning concreting over gardens to prevent flooding had been introduced.

Attached documents
Reydon Parish Council Jean Brown

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 1232

Comment 4.8 Residential Gardens and Urban Infilling (Policy 8.31) (p 240)

We support the proposed conditions to be met before any garden development can be allowed and agree that Neighbourhood Plans should be allowed to set their own policies on this kind of development which has been a big issue for Southwold and is now beginning to affect Reydon.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 1186

Comment We support the proposed conditions to be met before any garden development can be allowed and agree that Neighbourhood Plans should be allowed to set their own policies on this kind of development which has been a big issue for Southwold and is now beginning to affect Reydon.

Attached documents
Southwold Town Council Lesley Beevor

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 1568

Comment The Plan and Vision could do more in protecting gardens as a source of wildlife habitat. Towns, and suburban gardens, have become much more important habitats with the increase in industrial agricultural methods. It is suggested that one of the places to reflect this is within Policy 8.31, which could include, as a rationale, protecting gardens as a source of wildlife habitat.
Sue Barnard

Section Policy WLP8.31 - Residential Gardens and Urban Infilling

Comment ID 1082

Comment Residential Gardens and Urban Infilling – lacking any clarity, individuality reigns, this is very poor as there is no set policy about tandem or infill development. Everything is left up to design materials criteria, which can lead to different results re approval or not, whereas a policy would give guidance and clarity to those intending such back garden developments, those objecting and for the planners and planning committee. Previously SCDC’s policy was much stronger and clearer than WDC’s and set out criteria. Unfortunately no comparison can be made with SCDC’s new local plan, as it is still in development. Difficult for planners for both district councils who all work out of Riverside, I believe, and for when the 2 councils merge or whatever it is called. This lack of a clear policy is terrible, there is a need for a set criteria. One scheme will fail with this woeful lack of criteria, but something similar will pass, poor policy.

Attached documents
Policy WLP8.32 - Biodiversity and Geodiversity

Barry Shimmield

Section
Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID
1366

Comment
Policies Map

I am surprised that the area known as Gunton Meadow Nature Reserve, South of Leisure Way, owned and managed by Suffolk Wildlife Trust, is shown as a simple Open Space.

Should not this be designated as either a Local Nature Reserve or a County Wildlife Site?

Attached documents
Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Section                      Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID                  1488

Comment                      The Company considers that draft Policy WLP8.32 should be re-phrased, for consistency with national guidance. National Planning Practice Guidance for the 'Natural Environment' (January 2016) states:

'Local planning authorities should only require ecological surveys where clearly justified.'

The requirement should therefore be proportionate to the location, nature and scale of development proposed. The Policy should also recognise national policy which states that environmental mitigation can be secured through planning conditions or planning obligations, to contribute to the acceptability of proposals (NPPF, para. 118). Policy WLP8.32 should therefore be reworded as follows:

'Development will be supported where it can be demonstrated that it maintains, restores or, enhances or mitigates the existing green infrastructure network and positively contributes towards biodiversity through the creation of new green infrastructure and improvement to linkages between habitats. Regard should be had to the Waveney Green Infrastructure Strategy.'

Attached documents
Clare Mackney

Section  Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID  731

Comment  2. Growth of housing and jobs is vital but the Plan appears to give priority to accommodating the outcomes of the developer-led site identification process over environmental protection and enhancement. The very few policies relating to the natural environment are concerned with preventing harm and only secondarily seek improvement, and should be worded more positively. For example, the sustainability measures listed in WLP8.28 should be provided other than in 'exceptional circumstances', not just 'where practical'. Simply to 'maintain' green infrastructure and biodiversity (policy WLP8.22) is not enough to warrant supporting a proposal and the term should be dropped so that the policy always seeks restoration and enhancement.

Attached documents
**Environment Agency**

**Section**  
Policy WLP8.32 - Biodiversity and Geodiversity

**Comment ID**  
887

**Comment**  
We strongly support this policy. In line with this policy, any strategic site allocation must be preceded by a baseline survey that should be carried out before planning is granted. If there are notable habitats present, we would re-iterate the necessity for appropriate mitigation and compensation plans to be submitted. Any wetland feature (pond, ditches, or other water features) must be retained, and a substantial buffer provided.

It is possible for housing and development to bring enhancements to the natural environment and an overall increase in biodiversity. This is especially true, where development is planned for agricultural land. Setting a requirement that all new development must create new priority habitat would support WLP 8.32 as well as the Local Planning Authority’s duty under the Natural Environments Rural Communities (NERC) Act 2006.

Examples of priority habitats:

* New wetlands (ponds, reed beds, linear wetlands) which can be created as part of Suds

* Deciduous woodlands – planted as shelter belts, alongside footpaths, or to shade Important for providing shade and cool places for people.

* Wildflower meadows and pollinator corridors which encourage

In a wider context, these types of new priority habitat can be used to link existing habitats if planning can occur at a larger scale. It may for example be possible to create a new green corridor between an area of development and a nearby wildlife site.

**Attached documents**
Forestry Commission Steve Scott

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 1514

Comment We apologise this has been sent after your deadline, but this information is more guidance for the future than comment on the detail of the local plan draft. The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.

A summary of Government policy on ancient woodland


Section 40 – "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity".


Paragraph 118 – "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss".


This Guidance supports the implementation and interpretation of the
National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non-statutory consultee [http://www.forestry.gov.uk/forestry/INFD-98UH7N] on "development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in Natural England's Ancient Woodland inventory [http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm]), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings"

It notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.


The Forestry Commission has prepared joint standing advice [https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences] with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.

The Standing Advice website will provide you with links to Natural England's Ancient Woodland Inventory [http://www.gis.naturalengland.org.uk/pubs/gis/tech_aw.htm], assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website [http://www.forestry.gov.uk/forestry/infd-
UK Forest Standard 2017

Page 24 "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs).


Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".


Paragraph 2.53 - This has a "renewed commitment to conserving and restoring ancient woodlands".

Paragraph 2.56 – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".


Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.

In the wider planning context the Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives [http://www.forestry.gov.uk/forestry/infd-9asbjw] as part of a wider integrated landscape approach. For instance through:

* the inclusion of green infrastructure [http://planningguidance.communities.gov.uk/blog/guidance/natural-
environment/biodiversity-ecosystems-and-green-infrastructure/] (including trees and woodland [http://www.forestry.gov.uk/forestry/BEEH-A6LMEZ] ) in and around new development; and

* the use of locally sourced wood in construction and as a sustainable, carbon lean fuel [http://www.forestry.gov.uk/communitybiomass] .

Attached documents
### Glenys Westmacott

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.32 - Biodiversity and Geodiversity</th>
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<tr>
<td>Comment ID</td>
<td>165</td>
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<tr>
<td>Comment</td>
<td>Green corridors between houses and open spaces for wildlife needed to be planned in to the projects.</td>
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</table>

**Attached documents**
Kenneth Parry Brown

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 1079

Comment It should be the policy of the Council and incorporated into the Local Plan that Agricultural Land with Graded 1, 2 or 3A should be protected from development wherever possible. It should be protected from Solar Farms, Residential or Commercial development.
Lowestoft Town Council Shona Bendix

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 1304

Comment

The Council will seek to conserve the nature conservation and geodiversity interest of County Wildlife Sites, Local Wildlife Sites and RIGS identified on the Proposals Map, and Suffolk Biodiversity Action Plan species and habitats, by controlling the type and intensity of development. The Council will not grant planning permission for development which would be likely to cause net loss after mitigation and compensation of the relevant biodiversity or geodiversity interest, or protected BAP species, in terms of population size or loss of extent of BAP habitat or feature for which the site was designated.

The Council recognises the importance of biodiversity and geodiversity (the range of plants, animals and geological features) in Lowestoft, for its intrinsic value and its contribution to local distinctiveness and quality of life.

Locally designated sites make an important contribution to ecological networks and provide stepping stones between other sites and corridors, including those with national or international conservation designations.

In assessing the potential impact of development proposals, direct and indirect impacts will be taken into account.

Where the Council permits the removal of trees, replacement planting will be on a two for one basis. This may not always be possible or appropriate on the development site in question, and in such cases off-site provision will be expected as an alternative. Applicants are advised to liaise with the WDC Tree Protection Officer at the earliest opportunity to discuss appropriate replacement species, size, and locations. All replacement tree planting proposals will need to be accompanied by a tree care and management plan for the new trees.

Attached documents
Norfolk County Council Stephen Faulkner

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 768

Comment The County Council note that as yet the impact of proposals on internationally protected habitats has yet to be assessed and no necessary mitigation has been identified. There is potential for adverse impacts on designated sites within Norfolk arising from the development proposed in the plan, e.g. from increased recreational use. A report of a study of existing recreational impacts on Natura 2000 sites in Norfolk was published this year (Panter, C., Liley, D. & Lowen, S. (2016). Visitor surveys at European protected sites across Norfolk during 2015 and 2016; unpublished report for Norfolk County Council, Footprint Ecology) and this will help inform the evidence base for an Appropriate Assessment of the Local Plan.

The County Council also note that currently a Norfolk Green Infrastructure Mapping project is being undertaken, funding by all planning authorities in Norfolk, and which has mapped ecological networks and Green Infrastructure corridors (in line with the requirements of the NPPF, paragraph 117). It would be reasonable to extend the mapped corridors into the Waveney district area.

Attached documents
River Waveney Trust Andrew Mackney

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 914

Comment Policy WLP8.32 Biodiversity and Geodiversity

This policy should be more strongly worded to include a presumption against development that results in the loss of green infrastructure or biodiversity. Supporting development just because it 'maintains' the status quo sets aspirations too low. We support the positive element of the policy.
Rosemary Simpson

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 143

Comment I do hope that the Council are working with Suffolk Wildlife Trust to ensure safe pathways for wildlife.

Attached documents
**South Norfolk District Council Adam Nicholls**

**Section** Policy WLP8.32 - Biodiversity and Geodiversity

**Comment ID** 1609

**Comment** • Paragraph 8.180 – it would be useful to include the date of the Waveney Green Infrastructure Strategy.

**Attached documents**
Suffolk Wildlife Trust James Meyer

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 1247

Comment We support the content and intentions of policy WLP8.32, including the reference to protecting County Wildlife Sites and Priority (formerly Biodiversity Action Plan) species and habitats. We also support the reference in the explanatory text to securing ecological enhancements as part of new developments.

We consider that the policy could be improved by the following amendment to the fourth paragraph (new text shown in italics):

"Where there is reason to suspect the presence of protected and/or Priority species or habitats, applications should be supported by an ecological survey undertaken by a suitably qualified person. If present the proposal must be sensitive to, and make provision for their needs include appropriate mitigation and/or compensation measures. All development should also include ecological enhancements which maximise the site's value for biodiversity".

Attached documents
Watts

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 195

Comment If areas within the District are 'internationally protected' (or even 'nationally protected'), why are any proposals being considered which might damage these areas and therefore require mitigation measures which would probably require the use of some Council funds (i.e. local taxpayers money).

Attached documents
Watts

Section Policy WLP8.32 - Biodiversity and Geodiversity

Comment ID 262

Comment

It is not always possible to provide compensatory habitat where development damages an important biodiversity site. It is difficult and usually costly to do this.

Habitat protection means exactly what it says. Important habitats should be protected at all costs. There are still too many inappropriate damaging developments which are allowed to proceed. This is doubly frustrating and disappointing when developments are given the green light against the wishes of local residents. This not only damages the biodiverse environment, it also means that residents come to mistrust both the planning system and the planning officers.

The whole point of Local Plans was supposedly to put planning power into the hands of local people. This principle falls apart if the views of local residents and the protection guidelines that they are trying to uphold, are blatantly ignored by planning officers and government ministers.

Attached documents
Policy WLP8.33 - Landscape Character

Broads Authority Natalie Beal

Section Policy WLP8.33 - Landscape Character

Comment ID 486

Comment 8.187 – a further update to the Landscape Character Assessment in 2017.


Attached documents
Broads Authority Natalie Beal

Section       Policy WLP8.33 - Landscape Character

Comment ID   487

Comment       Page 245, Policy WLP8.33 – Landscape Character. Could the last sentence be interpreted to just relate to the Waveney area? Could it be worded to include the Broads as well?

Attached documents
Broads Authority Natalie Beal

Section  Policy WLP8.33 - Landscape Character

Comment ID  462

Comment  The Broads is not a National Park for planning purposes. It has a status equivalent to a National Park.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.33 - Landscape Character

Comment ID 1303

Comment WLP 8.33 Landscape Character - visually sensitive skylines, seascapes and significant views towards key landscapes and cultural features will be protected and where possible enhanced, is enhancing necessarily positive? E.g. Banners, lighting etc on sea wall near East of England Park?

Assessment of design quality for major applications for residential development will be made using the Building for Life criteria (CABE / HBF) and applicants will be expected to demonstrate that scheme designs can achieve a minimum score of 14 out of 20 (i.e. a silver award standard).

The design of all major non-residential or mixed-use developments will be assessed against the design criteria set out in By Design: DETR 2000.

It will be necessary to ensure that the siting, layout, scale, form, massing, materials and detailing of any proposed buildings will have a harmonious visual relationship with surrounding buildings. Matters of silhouette, proportion, and solid to void ratios will all be important considerations to be addressed.

It is important that the design of development creates buildings that work well for their occupiers. This includes the provision of adequate storage in new developments, be that for wheelie bins, cycles, or for the storage of mobility scooters. It may also mean designing for an ageing population to reflect demographic trends.

Tall buildings over 5 stories in residential areas or over 7 stories in business areas will not be considered in Lowestoft. All buildings will be no taller than the average height of the surrounding buildings in a 50 meter radius. Spires, flagpoles and reasonable decorative elements are not included in height requirements. Tall buildings may be defined as "buildings which are substantially taller than their neighbours and / or which significantly change the skyline". The definition is taken from 'Guidance on Tall Buildings' EH /CABE 2007, to which proposals should have regard.
Public art can play a critical part in the development and regeneration of places by making the architecture and/or the setting or public space around them more attractive, and establishing a sense of place and local identity. It also has intrinsic cultural and aesthetic value.

The placing of public artworks on or off development sites is a material consideration in the planning system. The Council encourages all major developments (10 or more dwellings or 1,000 sq. m or more of non-residential floorspace) to integrate public artworks as part of the overall design concept from the outset. Applications for development should incorporate information on the content and quality of any artwork into the accompanying Design and Access Statement.

In exceptional circumstances where the incorporation of artwork is not possible within the development, the Council will seek an equivalent financial contribution to a 'pool' for the commissioning of public artworks elsewhere within the Borough. In such cases, the requirement in the policy for integrated design would not apply.

The Council will work with the LTC, Lowestoft Vision, landowners and other partners to develop an active strategy to bring vacant premises in the town centre back into active use or, at a minimum, to introduce a scheme to make vacant premises look more visually attractive.

The Council will require all new development to be well designed and sustainable. In Lowestoft this will mean:

* layouts and designs that provide a safe, attractive, permeable, legible and useable public realm for all users, which is pedestrian and cycle orientated;

* areas which function well and where possible integrate residential, working and community environments and fit well with adjoining areas;

* the promotion of safe and secure communities;

* greener streets and spaces to contribute to local biodiversity, visual amenity, and health and well-being, and offset the impacts of climate change;

* protecting and enhancing the special character and distinctiveness of Ipswich and helping to reinforce the attractive physical characteristics of local neighbourhoods;

* buildings that exhibit very good architectural quality, are highly sustainable and are designed for long life by being capable of adaptation to
accommodate changing needs and uses over time;

* ensuring that new development incorporates cycle and waste storage, public transport infrastructure and car parking if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity; and

* new buildings in or around Air Quality Management Areas will be designed so that their size and layout will minimise, and at the very least not increase, localised retention of polluting emissions, and will include ventilation systems that protect the health of users of the buildings. Design that is considered not to adequately meet all these criteria will be refused.

National planning policy is clear that all new development should achieve high standards of design and environmental sustainability. Given high projected levels of growth in Lowestoft over the plan period and the distinctiveness of the north and south conservation areas of town where much of this growth is to be directed, design quality is considered to be a particularly important requirement for all new development in the town.

Business, dockside and industrial areas are encouraged to have high quality, well designed sustainable buildings that are efficient, useful and visually beautiful. The LTC notes that modern design can be as beautiful as period design, however the unique requirements of coastal towns mean that the best modern designs also blends in with the coastal environment. Materials such as wood, stone, flint, and brick wear much better than aluminium, metal and smooth plastic cladding. Smooth materials show wear (sand blasting from wind and rain) and staining from gull poo and should be avoided.

Attached documents
Reydon Action Group for the Environment Stephen Chessher

Section Policy WLP8.33 - Landscape Character

Comment ID 1245

Comment WDC is a member of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty Partnership and a signatory of the AONB Management Plan and therefore, in effect, a guardian of the AONB.

It is therefore disappointing to see that WDC proposes to downgrade the protection afforded to the AONB compared to current policy. The existing policy DM27 says: Development affecting the ...AONB ... will not be permitted unless it can be demonstrated there is an overriding national need for development and no alternative site can be found. By contrast, WLP8.33 says only: Development will not be permitted where it will have a significant adverse impact on:

* the setting of the Broads or Suffolk Coasts & Heaths AONB; or

* locally sensitive and valued landscapes including Rural River Valleys and Tributary Valley Farmland character areas.

Thus the proposed policy equates AONB land which is nationally designated with locally sensitive landscapes which have no such designation. It is difficult to avoid the conclusion that WDC has no commitment to the AONB and wishes to preserve maximum flexibility to allow development of AONB land. I would like to see a far more robust policy relating to the AONB which, as a minimum, should reference NPPF paragraphs 115 and 116.

Attached documents
Sue Barnard

Section Policy WLP8.33 - Landscape Character

Comment ID 1083

Comment WLP 8.33 Landscape Character - visually sensitive skylines, seascapes and significant views towards key landscapes and cultural features will be protected and where possible enhanced, is enhancing necessarily positive? E.g. Banners, lighting etc. on sea wall near East of England Park, which will be to the detriment of the avifauna and fauna? That area of sea wall is home to the only Purple Sandpipers found in Suffolk. What will happen to the banners in a good old easterly gale? Why is there no mention of the need for a new flood risk assessment, when one is mentioned for the neighbouring PowerPark and with the proposed increase in the number of steps and ramps there will be further flood risk, due to the removal of the sea wall top side walls to allow access.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Policy WLP8.33 - Landscape Character

Comment ID 939

Comment 4th bullet point, add reference to key historic landscape features.

We would recommend that the policy needs to be strengthened to highlight the national significance of AONB, such as:

Development will only be permitted where it:

* makes a contribution towards the special landscape character and qualities of the Suffolk Coast & Heaths AONB.

* does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of the area

* supports the wider environmental, social and economic objectives as set out in the Suffolk Coast & Heaths Management Plan.

Where exceptionally development is essential, landscape enhancements, mitigation or compensation measures must be provided to the satisfaction of the Local Planning Authority. Any existing development that adversely affects the landscape and special qualities of the AONB will be expected to satisfactorily mitigate this impact as part of any new development proposals.

Attached documents
Suffolk County Council Robert Feakes

Section Policy WLP8.33 - Landscape Character

Comment ID 1644

Comment There is an effective approach to landscape matters throughout the Plan. The recent settlement fringe sensitivity study commissioned by the District Council has provided a robust evidence base to inform the location and design of urban extensions. The draft Landscape Policy, including the identification of sensitive river valley and tributary landscapes, also appears to be founded on robust evidence. In addition, the plan recognises the character and special Qualities of the Broads NP and the SC&H AONB as well as the setting of these nationally designated areas.

Attached documents
The Society considers that the draft plan gives AONBs the same policy status as locally sensitive landscapes. This fails to acknowledge the national importance of AONBs and should specifically refer to paras 115 and 116 of the NPPF. These specify that great weight should be given to conserving the landscape and scenic beauty of AONBs and that major development should only be permitted in exceptional circumstances where it meets the specified tests set out in para 116. I note that the Colchester Borough Council Draft Local Plan has a much more robust policy that is dedicated to the Dedham Vale AONB. The Society refers you to the policy below and recommends that a similar policy is adopted in the Waveney Plan to ensure that adequate protection of national landscape designations is made:

POLICY ENV4 – DEDHAM VALE AREA OF OUTSTANDING NATURAL BEAUTY

Development will only be supported in or near to the Dedham Vale Area of Outstanding Natural Beauty (AONB) that:

(i) Makes a positive contribution to the special landscape character and qualities of the AONB, including tranquillity;

(ii) Does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of these areas, including by increased vehicle movement;

(iii) That there are no adverse impacts on the setting of the AONB which cannot reasonably be mitigated against and,

(iv) Supports the wider environmental, social and economic objectives as set out in the Dedham Vale AONB & Stour Valley Management Plan.

Applications for major development within or in close proximity to the boundary of the Dedham Vale Area of Outstanding Natural Beauty will be refused unless in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
Where exceptional development is essential, landscape enhancements, mitigation or compensation measures must be provided to the Local Planning Authority's satisfaction. Any proposals affecting existing development that adversely affects the landscape qualities of the AONB, or its setting will be expected to satisfactorily mitigate this impact as part of any new development proposals.

Proposals for solar farm development or wind farms in or near the Dedham Vale AONB should have regard to the advice in the Council's Guidance Note 'Designing solar farm renewable energy development' and in the 'Dedham Vale AONB Position Statement Renewable Energy in the Dedham Vale Area of Outstanding Natural Beauty (March 2013).

The Council will also encourage proposals in or near the AONB to underground new infrastructure associated with electricity schemes, where financially viable, to help protect the high landscape qualities of the Dedham Vale. (Colchester Borough Council Draft Local Plan)

Attached documents
Policy WLP8.34 - Coalescence of Settlements

Badger Building (E.Anglia)Ltd Edward Gilder

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 1450

Comment We do not support this policy as presently worded.

The policy as presently worded creates an absolute presumption on the development of land between settlements where the open gaps are smaller. There may well be sites around the fringe of villages where development would otherwise fit in to the landscape but which in the terms of this policy would be refused.

We think this policy would be better drafted as a criteria based policy to cover those few but exceptional circumstances. We would be happy to discuss appropriate wording to address this point.

Attached documents
Beccles Town Council C Boyne

**Section**  
Policy WLP8.34 - Coalescence of Settlements

**Comment ID**  
1154

**Comment**  
Policy WLP8.34: Coalescence of Settlements provides limited protection of all land outside the boundaries. It can be overruled by Neighbourhood Plans and by subsequent decisions of WDC. The land north of Lowestoft road between Beccles and Worlingham is outside the settlement boundaries, and although this area is mentioned on p.246, it is not named in the policy. The council would like to see stronger protection for this area.

**Attached documents**
Charles Fortt

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 424

Comment I strongly support policy WLP8.34. It is essential to retain the unique character of settlements, however much they have to expand to meeting increasing demand for housing and employment.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 970

Comment The intention of Policy WLP8.34 to prevent the coalescence of settlements is noted. In setting such policies, it is useful for a criteria based approach to be introduced and is necessary for any areas to be protected to be carefully considered and justified through the Council's proportionate evidence base.

Attached documents
Great Yarmouth Borough Council Nicholas Fountain

Section          Policy WLP8.34 - Coalescence of Settlements

Comment ID      1168

Comment          The Borough Council notes in particular the strategic allocation at North Lowestoft Garden Village in the parish of Corton (site policy ref. WLP2.12). The Borough Council is pleased to see that extent of the allocation maintains a sizeable gap between this and the settlement of Hopton-on-Sea (within Great Yarmouth Borough), and this is reinforced by draft policy WLP8.34 - Coalescence of Settlements. Note that the Borough Council is currently considering potential growth options for development in Hopton-on-Sea, including housing growth to the south of the current settlement. The Borough Council has no objection to the Corton draft allocation, but suggests that paragraph 8.193, listing important gaps, is amended to note that Hopton-on-Sea is located within the Borough of Great Yarmouth.

Attached documents
Historic England

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 1404

Comment We welcome the policy on coalescence of settlements.

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 1610

Comment • Policy WLP8.34 – Coalescence of Settlements. This is a negatively worded policy in terms of 'will not be permitted' and the sentiment is entirely understood and agreed with – this is a very important matter. However, could consideration be given to wording the policy more positively by saying: 'development in the areas shown on the proposals map(?) will be permitted only where it would not contribute towards the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements'? This would not weaken the policy substantially and would arguably be slightly closer in intent to the NPPF on the wording of policies.

Attached documents
Sue Barnard

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 1087

Comment WLP 8.34 Coalescence of Settlements - Very important for Gunton, need to maintain open green space between Corton and Gunton, need for recognition of open green space and leisure spaces e.g. Dip Farm football pitches and pitch and putt. Corton and Lowestoft mentioned in notes on page 246.

Attached documents
Watts

Section Policy WLP8.34 - Coalescence of Settlements

Comment ID 263

Comment I totally agree with this principle.

Attached documents
Policy WLP8.35 - Heritage Assets

Bourne Leisure Ltd (Lichfields) -
Lichfields (Sian Davies)

Comment ID 1489

Comment
Gunton Hall is a Grade two listed building. Bourne Leisure supports the statements at supporting draft text paragraphs 8.197 and 8.198 and at draft Policy WLP8.35 which recognise that heritage assets should be protected but also enhanced.

The Company supports the following statement in draft Policy WLP8.35:

'Proposals for development should conserve or enhance Heritage Assets and their settings.'

This approach accords with national planning policy (NPPF, para 126), which states:

'Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment.'

In developing this strategy, LPAs should take into account "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.'

Draft Policy WLP8.35 would then support continued investment in Heritage Assets such as Gunton Hall in the District, and will in turn support their continued conservation and enjoyment.
Policies WLP 35 and 8.36 refer to the protection and enhancement of heritage assets. Section 12 of the Framework provides the basis on which local planning authorities should plan for the conservation and enhancement of the historic environment. Here, an important distinction is made between 'designated' and 'non-designated' heritage assets. Any local planning policies must reflect this important distinction, in particular the different balancing exercises that a local authority must undertake when assessing planning applications that affect such assets. Paragraphs 134 and 135 are of particular relevance:

'133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

* the nature of the heritage asset prevents all reasonable uses of the site; and

* no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

* conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

* the harm or loss is outweighed by the benefit of bringing the site back into '

'134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

'135. The effect of an application on the significance of a non-designated

Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.35 - Heritage Assets

Comment ID 971

Comment Policies WLP 35 and 8.36 refer to the protection and enhancement of heritage assets. Section 12 of the Framework provides the basis on which local planning authorities should plan for the conservation and enhancement of the historic environment. Here, an important distinction is made between 'designated' and 'non-designated' heritage assets. Any local planning policies must reflect this important distinction, in particular the different balancing exercises that a local authority must undertake when assessing planning applications that affect such assets. Paragraphs 134 and 135 are of particular relevance:

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Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.35 - Heritage Assets

Comment ID 971

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Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.35 - Heritage Assets

Comment ID 971

Comment Policies WLP 35 and 8.36 refer to the protection and enhancement of heritage assets. Section 12 of the Framework provides the basis on which local planning authorities should plan for the conservation and enhancement of the historic environment. Here, an important distinction is made between 'designated' and 'non-designated' heritage assets. Any local planning policies must reflect this important distinction, in particular the different balancing exercises that a local authority must undertake when assessing planning applications that affect such assets. Paragraphs 134 and 135 are of particular relevance:

'133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

* the nature of the heritage asset prevents all reasonable uses of the site; and

* no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

* conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

* the harm or loss is outweighed by the benefit of bringing the site back into '

'134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

'135. The effect of an application on the significance of a non-designated
heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Attached documents
Historic England

Section Policy WLP8.35 - Heritage Assets

Comment ID 1406

Comment Listed buildings include a variety of structures reflecting the area's architectural, industrial and cultural heritage. We look for policies that carefully consider the preservation and preferably enhancement of these assets and, crucially, of their setting.

In some instances, a full consideration of setting may require close co-operation with adjoining districts where landscape setting may fall within the boundary of these neighbouring authorities. Where relevant, we will seek evidence of this cross-boundary co-operation in the evidence base.

We also encourage a policy that addresses the potential listing over the plan period of as yet unidentified heritage assets that further demonstrate the development and activity of the town and its inhabitants.

Attached documents
Historic England

Section Policy WLP8.35 - Heritage Assets

Comment ID 1408

Comment There are three Registered Parks and Gardens in Waveney which should be considered for protection through policy. The policy should anticipate and protect any future designations.

Attached documents
Historic England

Section Policy WLP8.35 - Heritage Assets

Comment ID 1411

Comment We welcome a policy basis for the creation and management of a local Heritage at Risk register for Grade II listed buildings. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified. Given the issues identified in Waveney, we would expect to see consideration through the Local Plan on how it can help address heritage at risk. The National Heritage at Risk Register can be found and searched here by local authority:

www.historicengland.org.uk/advice/heritage-at-risk


Attached documents
Historic England

Section Policy WLP8.35 - Heritage Assets

Comment ID 1405

Comment We welcome a section on the historic environment as part of the Local Plan. We also welcome the structure of a strategic and specific detailed policies. However, we recommend that further work is undertaken to provide a suite of locally-specific policies.

In the structure you are following we would expect to see an overarching historic environment policy supported by policies for: listed buildings, scheduled monuments and archaeology, conservation areas, registered parks and gardens, non-designated heritage assets (including locally-listed buildings), and heritage at risk. This could be done on an asset type by asset type basis or separated into designated heritage assets and non-designated heritage assets plus heritage at risk. Some considerations for such policies follow.

Attached documents
Historic England

Section Policy WLP8.35 - Heritage Assets

Comment ID 1412

Comment

Whilst we recommend that the chapter would benefit from further consideration, we have identified some points which we would highlight.

Paragraph 8.196 suggests that there are different levels of protection for grade II listed buildings, grade II registered parks and gardens and conservation areas compared to the other designated heritage assets. This is not the case. The statutory tests, under which the NPPF sits as a material consideration, provide the standard of protection. Paragraph 132 and 133 of the NPPF set out the tests where public benefits have to outweigh substantial harm; which itself has to be exceptional whatever grade or type of heritage asset is considered. These tests remain subsidiary to the statutory tests.

Policy WLP8.35 on Heritage Assets requires all development proposals which have the potential to impact on heritage assets (designated or non-designated) or their settings to be supported by a heritage impact assessment. Whilst we welcome the commitment to heritage assets, as per paragraph 128 of the NPPF, this needs to be proportionate to the scheme proposed and the number and significance of heritage assets affected.

Paragraph 8.197 refers to specific policies for locally listed buildings, conservation areas and archaeology. Two of these are non-designated heritage assets and one is a designated heritage asset, although this is not clear. In fact, the section and policy on locally listed buildings and non-designated heritage assets is unclear – how can a non-designated heritage asset be identified? Is there a list of historic parks and gardens, for example, which are not Registered Parks and Gardens?

Attached documents
South Norfolk District Council Adam Nicholls

Section Policy WLP8.35 - Heritage Assets

Comment ID 1611

Comment • Paragraph 8.199 – it would be useful to include the publication date of the Built Heritage and Design Supplementary Planning Document and maybe a web link if it is available online.

Attached documents
Suffolk Coast & Heaths Area of Outstanding Natural Beauty Paula Booth

Section Policy WLP8.35 - Heritage Assets

Comment ID 940

Comment Add here, in potentially in another part of the plan, the Council’s policy in respect of Enabling Development. Clarity over when enabling development is applied, making reference to Historic England criteria and contribution to protection of heritage assets.

Attached documents
Suffolk County Council Robert Feakes

Section  Policy WLP8.35 - Heritage Assets

Comment ID  1640

Comment  • Page 248 Historic Environment, paragraph 8.195. A reference to the Historic Environment Record would be welcome, as a list of designated and non-designated assets and the main source on the district's archaeological sites.

• WLP8.35 – The policy on Heritage Assets applies implicitly to archaeological sites and built/landscape heritage. It would be beneficial to make this more explicit, and set out that this is a policy relating to all types of heritage assets, including archaeological remains. The policy would then strongly complement WLP8.38, which gives further information on archaeological remains as a subset of heritage assets. Otherwise, it may be worth repeating paragraph 8.198 from WLP 8.35 in the archaeology policy section (WLP8.38).

Attached documents
Suffolk Preservation Society Fiona Cairns

Section  
Policy WLP8.35 - Heritage Assets

Comment ID  
706

Comment  
This policy lacks rigour and does not follow national guidance. The Society recommends that the terminology more closely reflects that of the NPPF and includes reference to the terms significance, substantial and less than substantial harm, and public benefit. We draw your attention to the policy below which the Society considers is a good example and recommends is used in place of the draft policy

Historic Environment

Development that will lead to substantial harm to or total loss of significance of a listed building, conservation area, historic park or garden or important archaeological remains (including development that adversely affects the setting of heritage assets) will only be permitted in exceptional circumstances where the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Where development will lead to less than substantial harm this harm should be weighed against the public benefits of the proposal.

Development affecting the historic environment should seek to conserve and enhance the significance of the heritage asset and any features of specific historic, archaeological, architectural or artistic interest. In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset, in the first instance, unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through character appraisals, the Local Planning Authority will request the removal of the features that undermine the historic environment as part of any proposed development. The Local Planning Authority will request the provision of creative and accessible interpretations of heritage assets impacted by development.

Conservation of the historic environment will also be ensured by:
(i) Identifying, characterising, protecting and enhancing Conservation Areas;

(ii) Protection and enhancement of existing buildings and built areas which do not have Listed Building or Conservation Area status but have a particular local importance or character which it is desirable to keep;

(iii) Preserving and enhancing Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, including their respective settings, and other features, which contribute to the heritage of the Borough; and

(iv) Sites of archaeological interest will be clearly identified and protected, and sites that become known, whether through formal evaluation as part of a Planning Application or otherwise, will similarly be protected according to their importance.

Heritage Statements and/or Archaeological Evaluations will be required for proposals related to or impacting on the setting of heritage assets and/or known or possible archaeological sites, and where there is potential for encountering archaeological sites so that sufficient information is provided to assess the significance of the heritage assets and to assess the impacts of development on historic assets together with any proposed mitigation measures. (Colchester Borough Council Draft Local Plan)

Attached documents
Suffolk Preservation Society Fiona Cairns

Section Policy WLP8.35 - Heritage Assets

Comment ID 711

Comment We note that this policy [WLP2.18 Oakes Farm, Beccles Road, Carlton Colville] uses the term 'enabling development'. The Plan does not include an Enabling Development policy and the Society would urge clarity around this important point, in view of recent enabling development decisions (Woodbridge and St Felix Schools) and the fact that the NPPF only considers enabling development in terms of benefiting heritage assets. Accordingly a policy such as that set out below is recommended which rigorously adopts Historic England criteria in their adopted guidance (2008) in determining planning applications that propose enabling development.

Enabling Development:

* Planning permission will only be granted for development proposals presented as enabling development in wholly exceptional circumstances and where they represent the last resort to secure the conservation of designated heritage assets.

* Planning permission will only be granted for development proposals that demonstrably meet the tests and criteria set out in the English Heritage guidance Enabling Development and the Conservation of Significant Places (or guidance superseding it) and fulfil national park purposes. (South Downs National Park)

Attached documents
Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Gladman Developments Limited Richard Crosthwaite

Section Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID 972

Comment Policies WLP 35 and 8.36 refer to the protection and enhancement of heritage assets. Section 12 of the Framework provides the basis on which local planning authorities should plan for the conservation and enhancement of the historic environment. Here, an important distinction is made between 'designated' and 'non-designated' heritage assets. Any local planning policies must reflect this important distinction, in particular the different balancing exercises that a local authority must undertake when assessing planning applications that affect such assets. Paragraphs 134 and 135 are of particular relevance:

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* the nature of the heritage asset prevents all reasonable uses of the site; and

* no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

* conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

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'134. Where a development proposal will lead to less than substantial harm...
to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

'135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

Attached documents
Historic England

Section  
Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID  
1410

Comment  
Historic England has published guidance pertaining to Local Listing which you may find helpful: https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/

In national policy terms, 'non-designated heritage assets' (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions. Paragraph 135 of the National Planning Policy Framework states that decisions on applications affecting such assets will require a balanced judgment that has regard to the significance of the asset and any harm or loss:


Government guidance recognises that local lists and local criteria for identifying non-designated heritage assets are a positive thing and can help with decision-making:


We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:

http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_buildings.aspx

There are enough appeal cases to indicate that inspectors regard non-designated heritage assets, and something on a local list, as an important material consideration in planning decisions. In fact, where there isn't a
local list, some inspectors have been unable to give as much weight to a non-designated heritage asset. Our website contains a number of appeal cases and if you search for 'locally listed heritage asset' or 'non-designated heritage asset', you will get relevant ones:
http://www.historicengland.org.uk/advice/hpg/planning-cases/

Robust provision for these heritage assets will increase the soundness of your forthcoming plan.

Attached documents
Historic England

Section
Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID
1407

Comment
Waveney contains sixteen designated Conservation Areas. We encourage that the local plan process provides a basis for the continued update and management of Conservation Management Plans, identifying each conservation area's local identity and distinctiveness. These should identify features that typify and contribute to this special distinctiveness as well as allow for less tangible judgments of character, quality of place and special distinctiveness. The plan will be more robust where it directs future development to take account of the special and distinctive character of Conservation Areas, emphasising that this is a cumulative result of built form, materials, spaces and street patterns, uses and relationships to surrounding features such as the surviving historic buildings and street patterns.

We would also welcome provision for any future designation of conservation areas within the district as well as specific provision for the landscape setting of different parts of the area.

Attached documents
Lowestoft Town Council Shona Bendix

<table>
<thead>
<tr>
<th>Section</th>
<th>Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1309</td>
</tr>
<tr>
<td>Comment</td>
<td>The LTC acknowledges the townscape importance of buildings of local interest which have no other statutory protection, and encourages their retention and upkeep. In situations where the benefits of a replacement development outweigh the retention of an existing building on the local list, the Council will expect a high standard of design. Supplementary guidance will be published updating the previous list and identifying buildings of particular local interest.</td>
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Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID 1308

Comment There is a presumption in favour of retaining and repairing buildings of local townscape interest. Proposals involving the loss of such buildings will only be permitted if it can be demonstrated by thorough analysis in the Design and Access Statement that the replacement building(s) is of an equal or higher standard of design and incorporates sustainability features.

Attached documents
Norman Castleton

Section  Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID  395

Comment  Locally Listed Buildings & Non-Designated Heritage Assets: All this seems very good but Waveney District Council has a dismal record regarding the preservation of heritage assets. The approach seems to be of the 1960s in nature. Knocking down perfectly sound older buildings or heritage assets like the Coopers Biscuit Factory instead of reusing them. Then putting something inferior in its place e.g. drive through Burger Bars. Heritage assets like the High Street Scores have been falling into disrepair over many years. I would suggest that the resources and knowledge of the various historical societies and preservation trusts be brought together to provide help and guidance to the Council and planners.

Attached documents
Suffolk Preservation Society Fiona Cairns

Section Policy WLP8.36 - Locally Listed Buildings and Non-Designated Heritage Assets

Comment ID 707

Comment The policy uses a variety of different terms: Non Designated Heritage Assets, Locally Listed Building, a building of historic or local significance and locally important. To avoid confusion one term should be used, preferably that of Non Designated Heritage Asset as used in the NPPF, to describe buildings which are on a local list or are given the status as part of a planning application process.

The Society welcomes the inclusion of local lists in Neighbourhood Plans. However the Society has noted that there is inconsistency in how policies relating to non-designated heritage assets are handled amongst Independent Examiners of Neighbourhood Plans across Suffolk. One Examiner excluded any reference to locally listed buildings outside of the designated conservation area. It is therefore important that the Waveney policy is clear that non-designated heritage assets can be located inside and outside conservation areas. Although buildings in conservation areas are protected from demolition and in Waveney are also subject to Article 4 Direction, there are instances where the inclusion of a specific building on a local list is justified. Buildings identified as non-designated heritage assets which are outside conservation areas are also afforded a level of protection through NPPF para. 135. We therefore recommend that the policy should be explicit that locally listed buildings within a NP might fall inside or outside of a conservation area (unlike the existing Waveney Local List which predominately contains buildings contained within or adjoining a conservation area).

Another NP Independent Examiner erroneously, in the opinion of the Society, rejected a policy to collate a list of non-designated heritage assets as it was deemed to be task for the local authority. Therefore in order to comply with the appropriate wording of the NPPF (Annex 2, Glossary, Definition of heritage assets), the Society recommends the final sentence of the policy is amended to read:
Neighbourhood Plans can identify other buildings of historic or local significance (non-designated heritage assets) in conjunction with the local authority.

Attached documents
Policy WLP8.37 - Conservation Areas

Beccles Town Council C Boyne

Section Policy WLP8.37 - Conservation Areas

Comment ID 1157

Comment Policy WLP8.37 deals with Conservation Areas. The last paragraph starts "proposals for replacement doors, windows and porches in Conservation Areas .... must be of a suitable design and constructed in appropriate materials....". The council would like to see "constructed in appropriate materials" changed to "appearance". If it is not a listed building, and the replacement looks the part, does it matter what it is made of? Modern sustainable materials improve living conditions, afford better heat insulation and should offer a benefit to the property.

Residents should not be prevented from using such materials, provided the character and look of the property is unchanged.

Attached documents
Lowestoft Town Council Shona Bendix

Section Policy WLP8.37 - Conservation Areas

Comment ID 1307

Comment The character and distinctiveness of Lowestoft is the product of a combination of Lowestoft's geographical setting, history and communities. It is fundamental to our local identity and should be cherished and encouraged.

The LTC is keen to protect and enhance the town's designated Conservation Areas. The character appraisals and management plans for each area highlight what is distinctive about the area including building styles, street patterns, land form, historical development and key views. Proposals for development will need to indicate precisely how each scheme will preserve and enhance the conservation area in which it is located by a thorough appreciation of these distinctive characteristics.

General guidance on demolition within conservation areas by the LTC states that there should be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area and that consent to demolish should not be given unless there are acceptable plans for redevelopment.

The East of England Plan stresses that local authorities should afford the highest level of protection to the wider historic environment which contributes to the distinctiveness of the region.

Attached documents
Paul King

Policy WLP8.37 - Conservation Areas

Comment ID 698

Comment

I support policy WLP8.37 but feel a more stringent approach should be taken with regard to replacement doors, windows and porches. If original doors or windows have previously been removed or changed prior to properties being included within a conservation area then the planning policy should require that any further changes to doors or windows require that new ones are replaced by using original materials i.e. wood and of a design as per the original design. The current policy allows for plastic or UPVC replacements to be used where original doors or windows have previously been replaced. This should not be permitted within conservation areas. Policy WLP8.37 should be amended to reflect this. Where doors or sash cord windows are reinstalled within a conservation area the only material permitted should be hard wood. The current trend towards using UPVC should be avoided at all cost.

Attached documents
Peter Eyres

Section Policy WLP8.37 - Conservation Areas

Comment ID 1106

Comment Unfortunately, I cannot agree with the claim in para. 8.209 that the policy on replacement windows has been successful. The council is far too willing to allow timber windows to be replaced in plastic, slow to demand decent drawings, and apparently unwilling to follow up breaches of conditions. The statement that new plastic windows will "match existing" is far too vague and subject to interpretation; experience shows that companies replacing windows have a very loose interpretation of "matching", which is why it is so important detailed, dimensioned drawings are required before planning permission is granted.

The indictment of the council’s implementation of this policy lies in comparisons with conservation areas in other districts, which are a pleasure to behold because they have conserved their timber windows. It is difficult to think of an element of a building which has a greater effect on the general appearance of a conservation area than its windows – at least at this time, when recladding and other horrors seem less of a threat – or fashion – than they once were.

Attached documents
Suffolk Preservation Society Fiona Cairns

Section Policy WLP8.37 - Conservation Areas

Comment ID 709

Comment Local Planning Authorities must register all valid applications for outline planning permission. However, if these applications provide insufficient detail to fully consider the effects of the proposal on the conservation area the LPA can require these details to be provided before the application is considered. The supporting text could usefully identify this point to assist applicants and their agents of the LPAs expectations when developing sites within conservation areas.

Attached documents
Policy WLP8.38 - Archaeology

Ben Falat

Section Policy WLP8.38 - Archaeology

Comment ID 19

Comment The Interactive map shows very sparse identification of "Archaeological Site of Regional Importance" (by clicking the layers dropdown). #2.83 is the first response to a search for "Archaeological". The region is rich in archaeology (many more sites that the three identified on the interactive map), as shown for example in the attachment on maps and in descriptions; the attachment produced by Aggregates Levy Sustainability Fund English Heritage Project Ref: 3987. The attachment is commended, though too detailed to list all individual items it covers 74sq.km of the Waveney Valley.

Historic England

Section Policy WLP8.38 - Archaeology

Comment ID 1413

Comment In the archaeology section the wording, "...preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and deposition of archive is more appropriate," is unclear. Who will determine which is 'more appropriate' and on what basis?
Historic England

Section  
Policy WLP8.38 - Archaeology

Comment ID  
1409

Comment  
We welcome specific provision for the protection and enhancement of archaeology as well as emphasis that sites of archaeological importance can occur everywhere. We encourage clear guidance on expectations for archaeological recording and the submission of records with an appropriate public record (eg: Historic Environment Records) for archaeological remains that are not to be retained in situ.

Where suggested sites are located in areas of known archaeological potential, weight should be given to this as a consideration in site selection and the comparison with alternate locations. We encourage close liaison with the County Archaeologist at site allocation stage.

Attached documents
Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP8.38 - Archaeology

Comment ID 1006

Comment Draft Policy WLP8.38 Archaeology

4.15 The Somerleyton Estate objects to draft Policy WLP8.38 because it is an onerous policy that requires a desk based archaeological assessment (as a minimum) to be included with 'any' planning application.

4.16 As currently worded the policy is requiring a full archaeological assessment even for change of use applications which may involve absolutely no ground excavations and therefore no harm to below ground archaeology.

4.17 Suffolk County Council now have a commercial arm to their archaeological service and since April 2014 have been charging for pre-application and post-consent planning advice and this policy could be viewed as self–serving as a result of its 'catch all' approach.

4.18 The requirement for archaeological assessment is already set down in the local planning authorities' local validation guidance so, where relevant, the County Council archaeological service should already be consulted on planning applications.

4.19 It is also essential for the term 'suspected archaeological importance' to be clarified. What does 'suspected' mean? Suspected by whom and expressed how? Inevitably all land everywhere not previously the subject of archaeological assessment could fall foul of this caveat.

4.20 We have seen reference in the Suffolk Historic Environment Record to Areas of High, Medium and Low archaeological potential. Policy WLP8.38 should make reference to these categories instead of 'known or suspected' areas and could then focus the requirement on the areas of high and possibly medium potential leaving the areas of low potential to planning condition.
Attached documents
Sotterley Estate Tom Barne
Evolution Town Planning LLP (Steven Bainbridge)

Section Policy WLP8.38 - Archaeology

Comment ID 1433

Comment Draft Policy WLP8.38 is a wide and onerous policy that requires a desk based archaeological assessment (as a minimum) to be included with 'any' planning application.

The requirement for archaeological assessment is set down in the local planning authorities' local validation guidance and where relevant the County Council archaeological service should be consulted on planning applications.

On face value the policy appears to be requiring a full archaeological assessment for changes of use applications which may involve absolutely no ground excavations and therefore no harm to below ground archaeology.

Suffolk County Council now have a commercial arm to their archaeological service and this policy could be viewed as self-serving as a result of its 'catch all' approach.

It is also essential for the term 'suspected archaeological importance' to be clarified. What does 'suspected' mean? Suspected by whom and expressed how? Inevitably all land everywhere not previously the subject of archaeological assessment could fall foul of this caveat.

We have seen reference in the Suffolk Historic Environment Record to Areas of High, Medium and Low archaeological potential. Policy WLP8.38 should make reference to these categories instead of 'known or suspected' areas and could then focus the requirement on the areas of high and possibly medium potential leaving the areas of low potential to planning condition.

Attached documents
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<tr>
<th>Section</th>
<th>Policy WLP8.38 - Archaeology</th>
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<tr>
<td>Comment ID</td>
<td>1641</td>
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<tr>
<td>Comment</td>
<td>• 8.210 (page 254) is a very useful statement. A reference to the Historic Environment Record would be welcome, as a list of designated and non-designated assets and the main source on the district’s archaeological sites. It may be worth relating this paragraph to the information in paragraph 8.198 in the archaeology policy section (WLP8.38), unless policy 8.35 is made more explicitly about all assets (see above). [see policy 8.35]</td>
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|               | • 8.211 is a welcome statement. Perhaps amend to "The policy prefers preservation in situ of archaeological remains appropriate to their significance, but where this is not feasible and on balance of factors development is acceptable, developers are expected to make arrangements to investigate and record sites, enhance public understanding, disseminate results and make archives publicly accessible. Historic England should be consulted on drafts of this paragraph."
|               | • Policy WLP8.38 – suggested wording is set out as a draft for discussion to add more detail to the policy (and/or supporting text) to give clarity to developers and reflect practice. However, the County Council would also recommend further discussion between our authorities and Historic England on specific wording: |
|               | An full archaeological assessment must be included with any planning application affecting areas of known or suspected archaeological importance, to describe the significance of any heritage assets affected and to ensure that provision is made for the preservation of important remains, particularly those that may be demonstrably of national significance. |
|               | Archaeological assessment prior to determination may comprise a combination of desk-based assessment; geophysical survey and/or field evaluation. |
|               | Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains,
assessment, analysis, reporting, dissemination and deposition of archive for access is more appropriate and curation will constitute appropriate mitigation for the impacts of development. Archaeological conditions or planning obligations will be imposed on consents as appropriate.

Appropriate programmes of work post-consent could include some or all of: further evaluation, upfront excavation, palaeoenvironmental work; building survey, and or monitoring or control of contractor’s groundworks.

Outreach related to archaeological work will be encouraged as appropriate to the scale of development and the nature of archaeological remains.

Attached documents
General Comment

Section  

General Comment

Comment ID  598

Comment  In my opinion, empty houses and 'brown' sites should be used first. Also, a workable plan made to curtail the buying of houses for 2nd homes, as in Southwold where some roads the majority are unoccupied for most of the year – a scandal when so many people need to be housed.

Attached documents
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<th>Broads Authority Natalie Beal</th>
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<td><strong>Section</strong></td>
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| **Attached documents** | }
Broads Authority Natalie Beal

Section General Comment

Comment ID 489

Comment General – maps - Please show the Broads Authority Executive Area on the maps.

Attached documents
Broads Authority Natalie Beal

<table>
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<th>General Comment</th>
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**Comment ID** 498

**Comment** Settlement Boundaries maps

Please show the Broads Authority Executive Area on the maps.

**Attached documents**
# Broads Authority Natalie Beal

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**Comment ID** 499

**Comment** Site Allocations Maps

Please show the Broads Authority Executive Area on the maps.

**Attached documents**
<table>
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<th>General Comment</th>
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**Comment ID** 497

**Comment** We would welcome a policy relating to the Broads perhaps similar to the emerging Greater Norwich Local Plan version. We can help you draft something.

**Attached documents**
Clare Mackney

Section General Comment

Comment ID 729

Comment As a resident of Beccles I have read the first draft of the Waveney Local Plan with interest. I appreciate the enormous amount of work that must have gone into it, and think it is an attractive and well-presented document. I also welcome the fact that all the District’s planning policies will be incorporated into a single document but do wonder whether it will proceed to formal adoption in this form given the merger with Suffolk Coastal District.

Attached documents
**Environment Agency**

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**Comment ID** 855

**Comment** Groundwater Protection

We would welcome the inclusion of a statement regarding land contamination and the protection of groundwater as a key issue. Land contamination and the protection of groundwater is an important environmental factor. Waveney District is underlain by the Crag and Chalk Formations both designated as principal aquifers. These are overlain by superficial deposits of sands and gravels designated as Secondary A aquifers in parts of the district. The groundwater is an important resource utilised for agricultural, industrial and public water supply. A number of source protection zones have been delineated to protect water resources in the district. Future development in the district will need to meet the requirements of the Environment Agency Guidance - protect groundwater and prevent groundwater pollution (March 2017) to ensure the protection of the water environment.

Within the plan there is reference to the use of SuDS in various policies, we feel that a general statement in regards to SuDS would be useful for developers. Whilst we support the use of SuDS, the Plan should ensure that planning applications consider surface and groundwater quality in their surface water drainage strategies. The use of infiltration SuDS has the benefit of providing recharge to aquifers, but to ensure that groundwater quality is not negatively impacted, the applications should include appropriate pollution prevention measures in line with CIRIA C753, in particular Table 26.1, when determining an appropriate design. Where land or groundwater contamination is encountered, the use of infiltration features should undergo a risk assessment. Often where land contamination is encountered, infiltration is not an appropriate method of surface water disposal. We recommend the Plan makes reference to our Groundwater Protection Position Statements G1 and G9 to G13 are met. These points should be included in the policy related to water quality.

Furthermore, due to their high risk of pollution, as a rule we do not support
the use of deep infiltration devices such as boreholes. The Plan should encourage the use of shallow infiltration devices with appropriate pollution prevention measures for the source of surface water. Where these are not possible, a discharge to watercourse or sewer should be explored prior to considering deep infiltration devices. Where other methods of disposal are at all feasible, these should be used in preference to deep infiltration devices. In some cases deep infiltration devices require an environmental permit.

Contaminated land

For development on Brownfield sites, the Local Plan should set out how the local authority will deal with any land contamination to ensure the protection of human health, ecological systems, property and the environment. The policy should refer to a tiered or phased approach to the development of contaminated land which meets with good practice (CLR11). We suggest the inclusion of a policy which outlines the steps to be taken, detailed below:

- A Preliminary Risk Assessment (PRA) which has identified all previous uses and contaminants associated with those uses. A conceptual model of the site identifying sources, pathways and receptors and any unacceptable risks arising from contamination at the site.

- A site investigation and detailed assessment of risk to all potential receptors both on and off site.

- An options appraisal and remediation strategy giving details of remediation measures proposed and how they will be undertaken.

- A verification report demonstrating completion of the remedial works.

Attached documents
Environment Agency

Section General Comment

Comment ID 854

Comment We welcome the inclusion of environmental issues in the district wide society issues however some of these issues do not seem to be detailed in the draft plan as a whole. We have expanded on these in our response.

Water Quality

We feel that water quality needs to be included more prominently in the plan. All development should demonstrate that it will not have an impact on water quality. The water framework directive (WFD) sets out the need to protect and improve the water environment, with targets for all water bodies to achieve 'good status' with no deterioration in current status.

We would welcome the inclusion of more detail in regards to the risk to water quality posed by agricultural run-off. The pollution of surface water on agricultural land can pose a risk to water quality.

Further information regarding the risks posed to the water environment from nitrates can be found in the Nitrates Directive (2013) and should be referenced as supporting this policy. The nitrate directive can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/82416/20111220nitrates-directive-consult-doc.pdf

In addition the quality of water bodies may be affected by the pollution from boat wash down. This should be considered in both regards to water quality and in regards to limiting the spread of invasive species, such as killer shrimps, that have a negative impact on native ecosystems. Further information can be found at http://www.nonnativespecies.org/checkcleandry/.

Attached documents
1. NATIONAL PLANNING POLICY

1.1. National Planning Policy Framework and Planning Practice Guidance

1.1.1. The National Planning Policy Framework has been with us now for over five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard, it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

"To boost significantly the supply of housing, local planning authorities should:

• Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;

• Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements...

• Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)."

1.1.2. The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective...
assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

1.1.3. Once a local authority has identified its objectively assessed needs for housing these needs should be met in full unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

1.1.4. As the Council will be aware the Government published its suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

* The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.

* Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.

* Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.

* Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall
housing need.

* Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.

* Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.

* The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section General Comment

Comment ID 943

Comment 2. FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER FEBRUARY 2017

2.1. Overview

2.1.1. The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.

2.1.2. Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.

2.1.3. The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.

2.1.4. Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that 'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'

2.1.5. Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haveS and have-nots.

2.1.6. The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.

2.1.7. The starting point is building more homes. This will slow the rise in
housing costs so that more ordinary working families can afford to buy a
home and it will also bring the cost of renting down. We need more land for
homes where people want to live. All areas therefore need a plan to deal
with the housing pressures they face.

2.1.8. Currently, over 40 percent of local planning authorities do not have a
plan that meets the projected growth in households in their area. All local
authorities should therefore develop up-to-date plans with their
communities that meet their housing requirement based upon an honest
assessment of the need for new homes.

2.1.9. Local planning authorities have a responsibility to do all that they can
to meet their housing requirements, even though not every area may be
able to do so in full. The identified housing requirement should be
accommodated in the Local Plan, unless there are policies elsewhere in the
National Planning Policy Framework that provide strong reasons for
restricting development, or the adverse impacts of meeting this
requirement would significantly and demonstrably outweigh the benefits.
Where an authority has demonstrated that it is unable to meet its entire
housing requirement, it must be able to work constructively with
neighbouring authorities to ensure that the remainder is met.

2.1.10. Plans should be reviewed regularly, and are likely to require
updating in whole or in part at least every five years. An authority will also
need to update its plan if its existing housing target can no longer be
justified against its objectively assessed housing requirement.

2.1.11. Policies in Local Plans should also allow a good mix of sites to come
forward for development, so that there is choice for consumers, places can
grow in ways that are sustainable, and there are opportunities for a diverse
construction sector including opportunities for SME housebuilders to
deliver much needed housing.

2.1.12. In terms of rural areas, the Government expects local planning
authorities to identify opportunities for villages to thrive, especially where
this would support services and help meet the need to provide homes for
local people who currently find it hard to afford to live where they grew up.
It is clear that improving the availability and affordability of homes in rural
areas is vital for sustaining rural communities, alongside action to support
jobs and services. There are opportunities to go further to support a good
mix of sites and meet rural housing needs, especially where scope exists to
expand settlements in a way which is sustainable and helps provide homes
for local people. This is especially important in those rural areas where a
high demand for homes makes the cost of housing a particular challenge for local people.

2.1.13. Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.

2.1.14. The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that it fulfils the Government’s agenda and provides the homes that its local communities need.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section | General Comment
---|---

Comment ID | 944

Comment | 3. LEGAL COMPLIANCE

3.1. Duty to Cooperate

3.1.1. The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

3.1.2. Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Waveney District Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

3.1.3. The PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

"These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters."
3.2. Sustainability Appraisal

3.2.1. In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

3.2.2. The Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council’s decision making and scoring should be robust, justified and transparent. Gladman look forward to reviewing the Sustainability Appraisal alongside the draft policies of the Plan when they are published in due course.

3.2.3. It is essential that the Plan is accompanied by a clear audit trail to set out how the assessment of potential sites for allocation has been undertaken. Any such process must be explicit, transparent and robustly justified within the Council’s proportionate evidence base. This evidence must clearly set out what common factors have been taken into account and the outcome for each site in reaching a robust planning judgment on site selection. It is essential that all interested parties are able to fully understand why certain sites are proposed for allocation and why others are not. It is expected that any such methodology should fully reflect the objectives of the Plan and the proportionate evidence base that has been prepared.

3.2.4. In this regard, we would highlight the Inspector’s note to Telford & Wrekin Council during the Examination of its Local Plan. Here, the Inspector refers to the requirements of a site selection process:

"10. Clearly, the detailed selection of sites for allocation involves an element of planning judgment. However, that judgment needs to be both explicit and transparent. In short, there needs to be a clear 'audit trail' that shows how the final decisions were arrived at, and what factors were taken into account in making such decisions."

3.2.5. In Telford & Wrekin the Inspector has raised a number of specific concerns regarding the Housing Site Selection methodology that was
undertaken by the Council before highlighting that it appears likely that he will reach a finding that the housing site selection exercise underpinning the Local Plan is flawed.

1 PPG Reference ID. 9-011-2014036

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section General Comment

Comment ID 945

Comment 4. OBJECTIVELY ASSESSED HOUSING NEED

4.1. Background

4.1.1. The process of undertaking an OAN calculation is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

4.1.2. The assessment requires local planning authorities to have a clear understanding of housing needs in their areas. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying:

"the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

• Meets household and population projections taking account of migration and demographic change;

• Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

• Caters for housing demand and the scale of housing supply necessary to meet this demand."

4.1.3. The starting point for the calculation of OAN is the latest household projections published by the Department for Communities and Local Government (CLG), which is currently the 2014-based household projections. Any adjustments to these projections must be fully justified.
within the Council's evidence base.

4.1.4. The objective assessment should identify the full need for housing before the Council considers undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

4.1.5. The need to consider market signals is of particular importance and relates to one of the core planning principles contained in §17 of the Framework, which states:

'Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'

4.1.6. Of critical importance is what the Framework goes onto say in §158 in the section discussing Plan Making. It states here:

'Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'

4.1.7. Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

4.1.8. The PPG gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below
extracts identify some particularly pertinent points.

'The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.'

4.1.9. The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

4.1.10. In order to consider how market signals should be taken forward §20 identifies some key concepts:

'Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.'

4.1.11. It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman is firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.

4.1.12. What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of other local plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which
we are currently within.

4.1.13. The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states:

'There remains more to do. As the London School of Economics (LSE) Growth Commission found, 'under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.'

4.1.14. Gladman therefore submits that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its realistic deliverability. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

4.1.15. The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgment it was stated:

"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, "[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies".

4.1.16. Therefore, following the exercise to identify the full, OAN for
housing in an area,

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate." (NPPF §152)

4.1.17. This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, compensatory measures may be appropriate.

4.1.18. The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

"Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

• any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or

• specific policies in this Framework indicate development should be restricted."

5.1.18. It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government considers to be restrictive. These include:

"sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion".
5.1.19. Although this list is not exhaustive it is clear that local landscape
designations, intrinsic value of the countryside, the character of areas and
green gaps are not specifically mentioned as constraints by the Framework
at footnote 9.

5.1.20. Clearly, the Government intends to standardise the calculation of
housing need as set out in the White Paper on housing. A proposed
methodology has been published for consultation3 and the Council’s Local
Plan evidence will need to be kept under constant review to ensure that the
impending changes to national policy are fully reflected through its local
plan making process.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section General Comment

Comment ID 941

Comment Context

Gladman Developments specialises in the promotion of strategic land for residential development with associated community. This submission provides Gladman Development's representations on the Waveney First Draft Local Plan. The Plan has been published for consultation from 28th July 2017 until 22nd September 2017.

The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered. Whilst the Waveney Local Plan is still at an early stage of production, it is vital that these tests are taken fully into account during its formulation. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

* PositivelyPrepared – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

* Justified – The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;

* Effective – The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

* ConsistentWithNationalPolicy – The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Attached documents
Gladman Developments Limited Richard Crosthwaite

Section General Comment

Comment ID 973

Comment Having considered the Waveney Local Plan First Draft, Gladman have raised issues regarding a number of matters.

The Local Plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council must start with a clearly defined NPPF and PPG compliant OAN, it should then develop a robust housing requirement using this OAN as a starting point, remaining mindful of the potential for change such as that arising from the Housing White Paper.

When allocating land for new development, the OAN must be treated as a minimum requirement and sufficient land should be identified within the Plan to demonstrate that this can be achieved whilst maintaining a rolling five year housing land supply. To achieve this, an appropriate strategy for accommodating growth must be selected that responds to the Council's proportionate evidence base. In doing so, development should be directed to all sustainable settlements to support their future vitality and viability as service centres in addition to the allocation of any large scale urban extensions, housing led regeneration schemes or new settlements.

Attached documents
Historic England

Section General Comment

Comment ID 1415

Comment Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include:

- Listed Buildings
- Scheduled Monuments
- Conservation Areas
- Registered Parks and Gardens
- Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

Attached documents
Historic England

Section General Comment

Comment ID 1416

Comment In preparation for the next draft, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Attached documents
Historic England

Section General Comment

Comment ID 1361

Comment Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development owing to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.
Historic England

Section  General Comment

Comment ID  1395

Comment  Site allocations – general comments

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. We note that many of the allocations have been identified as having archaeological potential. We recommend that you consult Suffolk County Council archaeological service and ensure that this information has been incorporated within your Strategic Housing and Economic Land Availability Assessment to ensure only sites which should be brought forward as allocations are identified.

We often find that while some of the sites in the Plan identify heritage assets as potential constraints, this is not consistently done for all sites and all heritage assets. There also can be limited information in documents on how sites might be developed, making it difficult for Historic England, and others, to assess their full impact. We are keen that allocated sites include development criteria to guide future proposals, including references to the historic environment where needed (this follows the national Planning Practice Guidance). There is a danger to both heritage assets and potential developers of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be understood and justified.

Site specific heritage policies may give guidance on development within or adjacent to heritage assets that demonstrate the local area’s special and distinctive character. You may wish to provide such policies for the
following areas of the historic environment, along with any others that are appropriate or brought forward via the consultation process.

In all cases, it should be emphasised in local policies and supporting text, that the setting of heritage assets should be considered holistically as part of the historic environment and that a consideration of setting should form part of any assessment of significance.

Where any site allocation includes heritage assets or could affect their setting, this should be identified as a consideration of material weight in the consideration of subsequent development proposals equal or greater than presumption in favour of development through the site allocation process.

Finally, please note that our comments on specific sites have been informed by desk-based analysis rather than site visits in most cases. We have not been able to judge the potential impacts more accurately on the ground and we have focussed on those sites with the greatest historic environment impact. This does not mean there are no issues with any other site and we therefore reserve the right to comment on any site as and when proposals develop.

Attached documents
Historic England

Section | General Comment
---|---

Comment ID | 1396

Comment | Strategic policies are a very important part of the plan, particularly given the need for Neighbourhood Plans to be in conformity with these policies. Paragraph 156 of the NPPF makes it clear that, 'Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver conservation and enhancement of the natural and historic environment including landscape.' Therefore we would strongly advise the inclusion of a strategic policy that addresses these matters.

Attached documents
Historic England

Section General Comment

Comment ID 1360

Comment Thank you for you notification of first draft consultation for your Local Plan. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your local plan development:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1

The Setting of Heritage Assets - Good Practice Advice in Planning 3

Conservation Area Appraisal, Designation and Management - Advice Note 1

The Historic Environment and Site Allocations and Local Plans - Advice Note 3

Local Heritage Listing - Advice Note 7

Sustainability Appraisal and Strategic Environmental Assessment – Advice
Note 8


All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:

https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

Attached documents
Historic England

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Comment ID: 1414

Comment: We would expect to see in the Plan monitoring indicators to measure how successful historic environment policies are. These can include preparation of a local list of non-designated heritage assets, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.

Attached documents
Jane Cole

Section             General Comment

Comment ID          665

Comment             Your local plan has just been forwarded to me, as I know the area well although I live in Uttlesford district in Essex. I want to congratulate you on an excellent, clear plan with all these issues set out very well and good solutions proposed. I just wish my district councilors and planners could produce something even half as good as this.

Attached documents
Making Waves Together Helen Johnson

Section | General Comment
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Comment ID | 998

Comment
Lowestoft cultural narrative and positing is changing with new cultural initiatives, changing attitudes and pipeline projects taking shape. Lowestoft is attracting external investment, with recent awards from Heritage Lottery Fund, Coastal Communities Fund and Arts Council England. The town is increasingly being seen as a place to invest in, with funding being used to support cultural capacity, cultural assets and community engagement opportunities.

A consortium led by Great Yarmouth Borough Council and Waveney District Council was successful in unlocking investment from the Great Places Scheme in March 2017. The project is largely funded with a £737,900 grant from Arts Council England and the Heritage Lottery Fund. Further funds are from the borough and district councils, Norfolk County Council, Suffolk County Council, Great Yarmouth Town Centre Partnership and Lowestoft Vision, East Suffolk Partnership and the Broads National Park.

The Great Places Scheme is a 3 year programme which aims to put arts, culture and heritage at the heart of the local vision, making a step change in the contribution of culture in Lowestoft and Great Yarmouth, and embedding them in the places' plans for the future. It is recognised that the Draft Local Plan was informed by policies and strategies and there is currently no place-based cultural strategic framework that would have influenced the draft.

Furthermore, given that there are council-led initiatives, including South Beach Visioning exercise in partnership with Wayne Hemmingway and the development of 'First Light Festival' for Lowestoft, it is important that culture is a part of the Draft Local Plan, which enables these activities to flourish and not restrained by policy.

Our Making Waves Together activities are centred on resident-led cultural animation as a vehicle for transformation and will involve:
* Connecting and strengthening cultural community assets through grassroots support to existing and emerging cultural players to grow capacity.

* Embedding high quality participatory cultural events and installations to transform our town centres/seafronts.

* Raising the profile of cultural education and work with young people to drive the vision for the area’s future.

* Making Culture - building cultural enterprises to create training and employment opportunities.

* Making culture a key component of the tourism offer.

* Developing a more collaborative approach to culture in place-shaping efforts across both towns and share learning between ourselves and with others.

* Developing and embedding a cultural strategy and narrative in both towns.

As part of Making Waves Together, a Lowestoft Cultural Strategy will be developed to inform how the Council in partnership with cultural organisations and art practitioners will develop, create and deliver culture. A Council-led Cultural Strategy for Lowestoft will provide a place-based approach that links in with national (Culture White Paper), regional (NALEP 'Culture Drives Growth') strategies, but which can provide tangible outcomes at a local level, comparable to Great Yarmouth Making Waves Cultural Strategy. A Cultural Board will be established to drive the cultural strategy and maximise the opportunities for development of a broad range of high quality arts during the project timeframe and post 2020. Therefore, the Draft Local Plan will need to provide the conditions to promote cultural outcomes to be delivered. The Cultural Strategy could include the following cross cutting themes and set of objectives:

* Improve the quality of life of people living across our communities by increasing cultural provision and participation, leading to improved social cohesion, improved health and wellbeing outcomes.

* To boost the tourism economy by capitalising on Lowestoft’s built heritage, natural coastal landscapes and cultural traditions.

* Support the creation and growth of cultural enterprises, training and employment opportunities as a catalyst for growth.
To support and develop cultural educational activities and enable all children and young people to have access to enjoy, are inspired and participate in cultural activities.

To have a strong and resilient cultural infrastructure that delivers a diverse range of activities that inspires communities.

In the absence of a cultural framework for Lowestoft, projects are contributing towards overarching strategies linked to economic growth and community economic development, including the wider New Anglia LEP Strategic Economic Plan for Norfolk and Suffolk and their new cultural strategy. The LEP launched 'Culture Drives Growth on 03 November 2016 and has set out a number of objectives which will help to drive the sector's economic, cultural and social impact, including:

* Accelerating creative job growth
* Scaling cultural and creative investment
* Backing creative talent
* Increasing cultural and creative diversity
* Building inspiring places to live, work, visit and invest
* Broadening international engagement

The Draft Local Plan justly makes references to Waveney becoming a stronger, more diverse economy benefiting from the growth of offshore renewable energy, with tourism remaining an important year-round part of the Districts economy. While there should be a focus on Lowestoft enhancing its position as a centre for construction, operations and maintenance of offshore renewable projects. With the growth of the offshore industry in Lowestoft, exploring the cultural potential will compliment and reflect established and emerging industries. Furthermore, having a diverse cultural offer will create a place to attract creative industries that would further add to the tourism income and market the towns to holidaymakers as undiscovered havens for art and heritage, encouraged by a supply of art activities and cultural assets. Culture needs to be elevated to the same focus and attention as other drivers in economic growth but they need to be placed in the right conditions. As recognised by NALEP, in their Cultural Drives Growth strategy, we can do more:

'The East’s cultural assets and offer at the heart of our shared growth agenda. They are a vital source of economic growth, both directly in terms
of jobs and employment, and as a source of innovation and collaboration with other growth sectors. They make an enormous contribution to making our region a fantastic place to live, work, visit, and invest. They attract talent, support our visitor economy and drive investment into vital cultural assets in our towns and cities, making them more vibrant and attractive places. Culture is worth £83.6m to the economy of Norfolk and Suffolk, excluding considerable tourism related spend, employs 5,800 people and has over 1,000 businesses.’

What can change?

It is recognised that culture, including local theatres contribute to the high level objectives for central and coastal Lowestoft in the Draft Local Plan, but this could be enhanced further by citing culture, including Marina Theatre, Seagull Theatre and Players Theatre as key contributors. For example the Marina Theatre which has a seating capacity of 775 people and programmes professional work and has 80k visitors per year, complemented by 200 seats at Players Theatre, there is no mention of these assets, furthermore there is no reference to 'culture or theatre' in the Draft Local Plan. The Players' Theatre has aspirations to expand and is already providing a resource to the local community as a social hub, with over 20 user groups. Seagull Theatre is a community venue and a vital community resource, which contributes to quality programming, facilities and opportunities to the area and uses performance as a tool in achieving health, wellbeing and social inclusion outcomes. Capitalising, improving and sustaining existing assets that have the potential to grow and service the community even more, have a major part to play in the vision.

Objectives for Central and Coastal Lowestoft:

* (4) Enhance the vitality and viability of Lowestoft Town Centre

* (6) Enhance the Tourism offer of the area

* (7) Enhance the quality of design and the public realm

* (10) Improve the natural, historic and built environmental quality of the area.

A stronger reference to culture, arts and heritage in the context of growth, urban design, health and wellbeing will be favoured.

Policy WLP2.7: A multiplex cinema on the Battery Green site is included in the plan, but there needs to be more conversation about how this impacts positively or negatively on local providers that run a cinema programme.
Furthermore, there is opportunity to incorporate the theatres near this locality into this policy area and create a cultural quarter that can help stimulate the night time economy.

The theatre infrastructure in Lowestoft can contribute towards growing the night time economy but there needs to be a more attractive offer, for national retailers including restaurants to invest in the town both in terms of long term planning but also financial incentives.

55% of new housing growth will take place in Lowestoft, cultural opportunities motivate people, families and businesses to locate and/or relocate to a place. Therefore, in these proposed growth areas there needs to be cultural opportunities and infrastructure to attract home owners and businesses to the town, adding to the provision of green infrastructure and community facilities as cited as Infrastructure Needs in the Draft Local Plan.

While each Local Plan is unique to its own locality, for Lowestoft to compete for opportunities and funding it needs to have the conditions that are comparable or enhanced to its closest coastal community neighbour. In comparison with Great Yarmouth's Local Plan they have policy linked to promoting Tourism, Leisure and Culture:

* Safeguarding key tourist, leisure and cultural attractions and facilities
* Support the development of new high quality tourist, leisure and cultural facilities
* Encourage a variety of early evening and night time economy uses
* Support proposals for the temporary use of vacant commercial building for creative industries, the arts and cultural sector
* Seek to support the role of the arts, creative industries, exciting environment that will attract more visitors
* Support proposals for new tourist attractions and educational centres that are related to the borough heritage.

In summary, there is a need for culture to have a stronger position in the Draft Local Plan with it being referenced alongside growth, contributing to a diverse economy, health and wellbeing and for policy to provide the right conditions for the sector to grow.

This response has been prepared by Lee Henderson, Chief-Executive, Marina Theatre Trust and Helen Johnson, Great Places Project and Cultural Capacity Coordinator, with contributions from Bob Dickson, Players.
Theatre.

Attached documents
Margaret and Harry Hill

Section General Comment

Comment ID 1238

Comment I have read carefully the First Draft of Waveney's Local Plan and Peter Eyres comments on the Plan which I fully support and agree with.
Michael Alexander

Section General Comment

Comment ID 786

Comment There already too many caravan sites in the area. It will mean the loss a recreational area.

M Alexander

Attached documents
### Natural England -

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**Comment**

Air Quality and Nature Conservation Designated Sites

While there is recognition in the plan that there will be an increase in traffic in proximity to designated sites in the Waveney Valley, and on the coast, the potential air quality impacts of this on are not explored in the plan, or in the supporting Strategic Environmental Assessment (SEA) or Habitat Regulations Assessment (HRA). Further analysis is required to fully understand the likelihood of impacts on Nature Conservation designated sites.

### Attached documents
Norman Castleton

Section General Comment

Comment ID 616

Comment Environment Key Issues: The problem with this whole plan is that it is of the 1960s. There was an excuse then that mans effect on the environment was not fully appreciated. There is no such excuse now. It is imperative that the 'environment' and the effect of any form of development or activity is assessed in terms of its effect on the environment. I see no such thinking in this plan. Rather let's forge ahead and carry on as we have done before and use up more of the Earth's scarce resources, expand outwards and for ever more until there is not a piece of green field left. Build more and more road space ignoring the fact that the more roads that are built the more traffic congestion builds. No thoughts here about more environmentally friendly forms of transport or building more within already urbanised areas. The 'Precautionary Principle'. should be at the fore-front of all planners and decision makers thinking.

Attached documents
Norman Castleton

Section General Comment

Comment ID 388

Comment Environmental Key Issues

There seems to be little in this play about mitigating some of the issues raised above, water and air quality. I would like to see the question of environmental standards raised in this document. For example raising environmental standards for any new building, development of brown field sites only, reducing fossil fuel fuelled cars and lorries & conformance to government policy for introduction electric vehicle with power point provision. Keeping petrol and oil fuelled cars out of town centres and the introduction of park & ride schemes. All these things and more will have to be done eventually to avoid environmental disaster so they might as well be instituted in this plan.

Attached documents
**Norman Castleton**

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<tr>
<td>Comment ID</td>
<td>392</td>
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<tr>
<td>Comment</td>
<td>Environmental Key Issues: As the climate continues to warm and sea levels continue to rise with the possibility of savage climatic events then more needs to be done. Flooding from the sea has not be mentioned here but in the area it ought to be a prime consideration. Mickey Mouse type defences are now available to try and hold back flooding in the Lowestoft harbour area and a wall is envisaged. However, more needs to done regarding defending the coastline with hard defences. Managed retreat is all very well in theory but in practice it will mean most of East Anglia being under water particularly during the winter months. Islands of high ground will exist but transportation between the islands will be extremely difficult to say nothing of the pollution of water supplies.</td>
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**Attached documents**
Norman Castleton

Section General Comment

Comment ID 111

Comment Environmental key issues: Green recreational spaces are important to maintain the health of the population and the health of the built up environment. No more building static caravan sites on green coastal sites. Dog, cat & raptor populations also need careful control. No more pulling down historic buildings to make way for drive through Burger & Coffee bars. Pedestrian areas in towns should be exactly that and not for the indiscriminate use by polluting traffic, cyclists and skate boarders. Encourage tree planting and more green areas.

Attached documents
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<tr>
<td>Comment ID</td>
<td>117</td>
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<tr>
<td>Comment</td>
<td>Environmental key issues:</td>
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<td></td>
<td>I think that anyone involved in the drafting and likely implementation of this plan should view the Al Gore promoted film: An Inconvenient Truth Sequel: Truth To Power. There can be no doubt now that Global Warming is the biggest issue of our time and supersedes any other consideration in this plan if there is to be a future in Waveney and anywhere else. Businesses and right wing politicians will try to rubbish this fact. Without action now there is no future for anyone.</td>
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Attached documents
Norman Castleton

Section General Comment

Comment ID 445

Comment Introduction:

I think that throughout this first draft the preferred approach is deeply flawed. It does not seem to recognise that the state & decline of the environment has become such an important issue that it cannot be ignored any longer. The plan continually uses the term "sustainable" but it carries on in the same old way bowing to the old fashioned ideas of growth perpetrated by politicians believing this will buy them votes and the good will of big businesses within a global economy. This seems to be a plan for speculative builders and more and more unsustainable houses and roads. Cover over the green fields with tarmac and concrete and encourage the decline of the wild flora and fauna until we have the silent spring. Overstretch the energy and water resources. No specific mention of conservation or building on brown field sites, water reuses systems and soaks for overflows, environmentally sustainable energy generation, public transportation, electric cars or lorries, reduction of waste and recycling - that is, providing a future for future generations. The sort of growth envisaged in the document cannot go on and on. We are already seeing the dramatic effects that changes in the climate are producing. I therefore think that overall this so called plan for the future needs a radical rethink.

Attached documents
North Cove Parish Council Jayne Evans

Section General Comment

Comment ID 1267

Comment At our parish council meeting on September 20th, I was asked to collate comments received by the council on the Draft Local Plan.

1. Why when Suffolk Coastal and Waveney are now operating as one council is there not one draft plan?

Attached documents
Reydon Action Group for the Environment Stephen Chessher

Section General Comment

Comment ID 1246

Comment

Enabling Development

Many local planning authorities have specific policies on enabling
development or are proposing them for new local plans.

I would like to see WDC adopt such a policy in order to provide clarity and
some element of predictability for the benefit of landowners and
developers; planners and decision makers; and those who may be affected
by enabling developments.

Such a policy should:

* explicitly link enabling development with the protection of heritage assets
  as per NPPF paragraph 140;

* make clear that proposals presented as enabling development and which
depart from the Local Plan will only be approved in wholly exceptional
circumstances as a last resort to secure the conservation of the heritage
assets in question;

* make clear that any application for enabling development should be
  submitted as a full (not outline) planning application so as to enable the
decision makers to make a full assessment of the benefits and disbenefits of
the proposed scheme; and

* incorporate by reference the authoritative English Heritage (Heritage
England) guidance Enabling Development and the Conservation of
Significant Places or any successor documents.

Attached documents
Reydon Action Group for the Environment Stephen Chessher

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<td>Comment ID</td>
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<td>Comment</td>
<td>Proposed Merger of Local Authorities</td>
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At the outset, I wish to make clear my concern and surprise that the draft Local Plan makes no reference to the proposed merger of WDC with Suffolk Coastal District Council (SCDC) which is expected to complete in 2019, ie one year after the WDC Local Plan is expected to be adopted.

I am aware that SCDC is currently consulting on its own revised local plan. We therefore have the bizarre situation that two adjoining local authorities are in the process of merging but nonetheless each is preparing its own long-term local plan (to 2036) in the knowledge that each authority is expected to cease to exist in two years time.

It is difficult to see how residents of WDC can be expected to take the consultation process seriously when WDC itself fails to do so.

At the very least I would have expected the draft Plan or a supporting document to set out how the Plan might change following the merger. For example, is it expected that the two plans will be merged (with inevitable amendment where they do not dovetail)? Is it expected that one of the two plans will largely supercede the other?

I suggest that it would be sensible for preparation of the Plan to be paused so that a combined plan can be prepared with SCDC for the new combined authority. Any other approach will surely lead to confusion and a considerable waste of resources.

All of my remaining comments should be read in the light of this fundamental caveat.

Attached documents
Reydon Parish Council Jean Brown

Section General Comment

Comment ID 1233

Comment 5. Proposed New District-Wide Policy: Enabling Development

We believe that there should be a policy setting out the scope of policy with regard to development which is permitted as enabling. We believe that a policy is needed which sets out precisely what the aims of any enabling development are and makes explicit that this provision is designed to support the maintenance of heritage assets for public benefit. It would be useful to explicitly reference the English Heritage guidance as part of this policy and to require that any applications for enabling development should be submitted as full applications. These provisions can be found in other Local Plans and we believe they should be included in that of Waveney.

Attached documents
S Read
Marrons Planning (Jenny Keen)

Section General Comment

Comment ID 1493

Comment For a plan to be adopted it must pass an examination and be found to be 'sound'.

Paragraph 14 of the National Planning Policy Framework (NPPF) refers to the presumption in favour of sustainable development and makes specific reference to plan making stating that:

* Local Planning Authorities should positively seek opportunities to meet the development needs of their area;

* Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

* any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

* specific policies in this Framework indicate development should be

Paragraphs 154 and 157 of the NPPF identify (amongst other criteria) that Local Plans should be aspirational but realistic and should plan positively for development to meet the objectives, principles and policies of the NPPF.

The NPPF at paragraph 182 also sets out that the plans will need to be prepared in accordance with the duty to cooperate, legal and procedural requirements and that they must be 'sound'. There are four tests of 'soundness', which are that each plan must be:

* Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable
development;

* Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

* Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;

* Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

Attached documents
Simon Clack

Section  General Comment

Comment ID  1008

Comment  -does the planned merger of WDC and Suffolk Coastal District Council (due in 2019) mean that WDC's new local plan (to be adopted in 2018) will only be valid for a year? Would it not have made more sense to wait and construct a broader and more coherent plan for the new East Suffolk District Council?

Attached documents
Simon Flunder

Section | General Comment

Comment ID | 984

Comment

I note that there appears to be no mention in the draft Plan or supporting documents of the intended merger between Waveney District Council (WDC) and Suffolk Coastal District Council (SCDC). This despite the facts that the merger is intended to be completed by 2019 (one year after the Plan is expected to be adopted); the Plan is to cover the period up to 2036; and SCDC is currently consulting on its own revised plan. On the face of it the failure to mention the intended merger and the implications for the Plan is extraordinary and makes a mockery of the consultation process. It would appear that the obvious solution is for WDC to pause work on its draft Plan so that a single draft plan can be prepared for the combined authority.

It is, of course, possible that the intention is to maintain two Local Plans, one for each of the former DC areas. If this is the case, I believe that this should be clearly stated, together with any plans to use the five year review procedures to bring these plans together.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section General Comment

Comment ID 1187

Comment Proposed New District Policy: Enabling Development

We believe that WDC, in common with many other local planning authorities, should have a policy with regard to development which is permitted as enabling. We believe that a policy is needed which sets out precisely what the aims of any enabling development are and makes explicit that this provision is designed to secure the future conservation of a heritage asset for public benefit in accordance with NPPF paragraph 140.

Enabling development, by definition, conflicts with planning policy but may be considered because of the perceived public benefit that flows from conservation of heritage assets which might otherwise be lost. We do not believe that it is appropriate for an application for enabling development to be made as an outline application as it will not then be possible to make a proper analysis of the benefits and disbenefits which are the essence of enabling development. We therefore consider that any application for enabling development should be made as a full application.

We consider that it would be helpful to incorporate by reference the guidance of English Heritage contained in Enabling Development and the Conservation of Significant Places which has been acknowledged by the courts as authoritative.

Attached documents
Southwold and Reydon Society Philip O'Hear

Section General Comment

Comment ID 1171

Comment We note at the outset that there appears to be no mention in the draft Plan or supporting documents of the intended merger between Waveney District Council (WDC) and Suffolk Coastal District Council (SCDC). This despite the facts that the merger is intended to be completed by 2019 (one year after the Plan is expected to be adopted); the Plan is to cover the period up to 2036; and SCDC is currently consulting on its own revised plan.

On the face of it the failure to mention the intended merger and the implications for the Plan is extraordinary and makes a mockery of the consultation process. It would appear that the obvious solution is for WDC to pause work on its draft Plan so that a single draft plan can be prepared for the combined authority.

It is, of course, possible that the intention is to maintain two Local Plans, one for each of the former DC areas. If this is the case, we believe that this should be clearly stated, together with any plans to use the five year review procedures to bring these plans together.

All our remaining comments are made subject to this fundamental objection.

Attached documents
Southwold Town Council Lesley Beevor

Section                  General Comment

Comment ID              1555

Comment                  The draft Local Plan is viewed as a progressive document and a welcome
development of the current Local Plan. It provides strong support for
Neighbourhood Planning and encourages designated areas to develop
policies further, and adapt them to local circumstances.

In conclusion, the publication of the Draft Local Plan should result in the
development of even more innovative NP policies. These will become part
of the development plan and be used in determining planning applications
in the Neighbourhood Area.

Attached documents
Suffolk County Council Robert Feakes

Section General Comment

Comment ID 1695

Comment Colleagues from the Highways Development Management Team have considered the sites proposed for allocation, and their comments are set out in an appendix to this letter [see Appendix 1 and 2 of attachment and comments logged under site specific policies]. The comments are provided without the benefit of detailed transport assessment, which will take place at the planning application stage, so should be considered as indicative and as having been provided on a 'without prejudice' basis.

The comments identify whether a Transport Assessment or Transport Statement is likely to be required, and potentially significant issues or requirements to be considered as proposals come forward. The comments are not intended to be automatically translated into policy requirements, but if the District Council believes it would aid the development management process to flag requirements in site specific policies, the County Council would be pleased to discuss appropriate wording.

Suffolk County Council Robert Feakes

Section General Comment

Comment ID 1694

Comment The County Council welcomes the District Council's inclusion of policy requirements to carry out archaeological investigation and assessment of site allocations, as this helps highlight the requirement and gives clarity to developers as to what is likely to be required. However, the District Council could simplify the current proposed requirements. It may be more appropriate to include a specific requirement within policy only where the current evidence justifies archaeological assessment as being required prior to determination. Where archaeological assessment can be carried out by condition, following determination, the policy requirement could be deleted and instead an informative statement be retained in the supporting text.

Further discussion on this matter would be welcomed and we would appreciate the opportunity to systematically go through each site to ensure that the policies and supporting text are accurate in relation to the need for upfront assessment or work by condition, and that they are consistent in their wording; in some cases, given revisions to site area, further work that has been undertaken since Issues and Options, or interpretation of SCC comments, a condition may be appropriate. The comments below are therefore not fully exhaustive in terms of detail and relate only to sites which have not previously been commented on or where a specific policy amendment/enhancement is proposed.

Attached documents
Suffolk Wildlife Trust James Meyer

<table>
<thead>
<tr>
<th>Section</th>
<th>General Comment</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>1266</td>
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<tr>
<td>Comment</td>
<td>Habitats Regulations Screening Report</td>
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<td>We have read the Habitats Regulations Screening Report accompanying the draft</td>
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<td>Local Plan and we note its conclusions. We disagree with the conclusions of</td>
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<td>the screening with regard to the likely increase in recreational disturbance</td>
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<td>impacts at European designated sites which could arise from the proposed new</td>
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<td>developments. Likely significant effects (LSE) from a number of developments are</td>
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<td>screened out due to there being no walking link between the development site and</td>
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<td>European designated sites, however this does not take into account increased</td>
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<td>visitor numbers to these sites resulting from people arriving by car.</td>
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<td>Work undertaken on behalf of Babergh District Council, Suffolk Coastal District</td>
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<td>Council and Ipswich Borough Council as part of the Recreational Disturbance</td>
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<td>Avoidance Mitigation Strategy (RAMS) has demonstrated that new developments</td>
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<td>within 13km of European designated sites will contribute to increased visitor</td>
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<td>numbers. The HRA Screening should therefore be revisited to take full account of</td>
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<td>the likely impact of increased recreational pressure at the designated sites. We</td>
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<td>consider that Waveney District Council should also engage with Babergh District</td>
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<td>Council, Suffolk Coastal District Council and Ipswich Borough Council on their</td>
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<td>RAMS and become part of the area for the strategy.</td>
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Attached documents
Suffolk Wildlife Trust James Meyer

Section General Comment

Comment ID 1252

Comment We recommend that all proposed site allocations are subject to ecological assessment prior to their allocation. It must be ensured that no sites of significant ecological value are allocated for development and that any development maximises the biodiversity value of any sites that are allocated. Any planning applications must be supported by adequate ecological assessment of the proposed development.

Attached documents
Therese Coffey

Section General Comment

Comment ID 1283

Comment First, thank you to the council for preparing this plan, which should deter speculative planning applications and sets out a path for developing homes and businesses in the Waveney area.
# Sustainability Appraisal

**Historic England**

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<tr>
<th>Section</th>
<th>Sustainability Appraisal</th>
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<td>Comment ID</td>
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**Comment**

Waveney District Council Sustainability Appraisal Draft Local Plan consultation

Thank you for your notification of the Sustainability Appraisal Draft consultation for your Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We have been unable to review the document at this time but can provide this general advice on your sustainability appraisal.

The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8, Sustainability Appraisal and Strategic Environmental Assessment: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/.

**Key Plans and Programmes**

When considering key plans and programmes, we recommend the inclusion and consideration of the following:

**International/European**

* The Convention for the Protection of the Architectural Heritage of Europe
* UNESCO World Heritage Convention
* European Landscape Convention
* The European Convention on the Protection of Archaeological Heritage
National
* National Planning Policy Framework
* Marine and Coastal Areas Access Act 2009
* Planning (Listed Buildings & Conservation Areas) Act 1990
* Ancient Monuments & Archaeological Areas Act 1979
* Government’s statement on the Historic Environment
* National Planning Policy Guidance

Local
* Conservation Area Character Appraisals and Management Plans
* Heritage/Conservation Strategies
* Historic Environment Record
* Local Plans
* AONB Management Plans
* Other Strategies (e.g. cultural or tourism)
* Listed building Heritage Partnership Agreements

Baseline Information
All designated heritage assets (Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, and Protected Wrecks) within the area should be identified. Mapping these assets provides a greater indication of their distribution and highlights sensitive areas.

We also would expect non-designated heritage assets to be identified. These include, but are not confined to, locally listed buildings. In addition to the above, we would expect reference to currently unknown heritage assets, particularly sites of historic and archaeological interest. The unidentified heritage assets of the City, Borough or District should be acknowledged and outlined in this section. Identification and mapping of designated and non-designated heritage assets at risk can provide an indication of clusters and themes.

Historic England’s Good Practice Advice Note 1 contains advice on other
relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

Key Sustainability Issues

We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include:

* Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it

* Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings

* Heritage assets at risk from neglect, decay, or development pressures;

* Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.

Evidence base

Any evidence base should be proportionate. However, with a local plan we
would expect to see a comprehensive and robust evidence base. Sources include:

* Archaeological assessments.

* Green Belt studies.

* Detailed historic characterization work assessing impact of specific proposals.

* Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/

* Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)

* Historic Environment Record.


* Heritage Gateway. www.heritagegateway.org.uk

* National and local heritage at risk registers.
www.historicengland.org.uk/advice/heritage-at-risk

* Conservation area appraisals and management plans

* Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project.
www.cravendc.gov.uk/CHttpHandler.ashx?id=11207&p=0

* Heritage Impact Assessments looking into significance and setting.

* Visual impact assessments.

* Topic papers.

Conclusion

In preparation for the next draft, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local
heritage groups.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.
Habitat Regulations Screening Report

Natural England -

Section

Habitat Regulations Screening Report

Comment ID

1576

Comment

Recreational Disturbance

The draft HRA screening report assess the effects of the plan on Natura 2000 sites (sites of international importance for nature conservation). We agree that the report has identified the relevant sites in and around Waveney District, and that it has also identified the other plans and projects that might act in-combination to cause significant effects.

A key issue in forward planning is the potential for increased housing and a bigger population in a district to result in increased recreational activity on designated sites. Increased recreational activity can cause disturbance to important bird populations (particularly through increased dog walking), and can result in direct damage to sensitive habitat types, for example, trampling of shingle vegetation.

This issue is considered in the HRA, and we support the planned approach to provide large green spaces with significant developments, and to improve connectivity in the green infrastructure network to benefit residents and wildlife, and to reduce pressure on sensitive sites. Green infrastructure which is well designed for dog walking, with a variety of attractive routes at least of 2.6km and with facilities such as dog bins and interpretation, should absorb a significant amount of recreational pressure, particularly dog walkers (see Jenkinson 2013).

However, recent studies have shown that designated sites within around 13km of home remain attractive to regular visitors (Footprint Ecology in prep.). This would potentially put many of the development areas in the district within range of regular visits to designated sites. Designated sites are also attractive for occasional day trips, such as visits at the weekend, adding to the increased recreational pressure.

Such impacts may be addressed by a bespoke mitigation and monitoring
scheme such as is currently being developed in Suffolk Coastal, Ipswich and Babergh Districts. The proposed Recreational Disturbance mitigation and monitoring strategy (RAMs) is to be funded by proportionate developer contributions.

It is Natural England’s advice that housing allocations are likely to have a significant effect on Natura 2000 sites in terms of recreational disturbance, and therefore that an appropriate assessment is required. The appropriate assessment should assess the likely recreational impact alone and in combination with other plans, and consider mitigatory measures including the provision of locally accessible green infrastructure suitable for dog walking, and the establishment of a district wide mitigation and monitoring strategy.

Attached documents
005 | Brambles Drift, Green Lane, Reydon, Southwold

Michael North
Artisan PPS Ltd (Leslie Short)

Comment ID
204

Comment

The following paragraphs constitute the representations made on behalf of Northland Reydon Ltd. (NRL) to the omission/exclusion of potential development sites reference 5/38 in the Waveney First Draft Local Plan 2017, on land north of Green Lane, Reydon, Suffolk. For the avoidance of doubt this constitutes and objection to the provisions of the Plan.

Previous initial representations made by others to the Council proposed the allocation of the land which is in two ownerships but two contiguous sites on the north side of Green Lane on the north side of the village of Reydon. NRL is the option holder and developer for the land working in conjunction and full agreement of the landowners with a common objective of delivering the land for primarily residential development and appropriate infrastructure.

In combination, the sites measure approximately 8.7ha. of land which is partly in agricultural use with the balance in recreational use (equitation). Previous submissions proposed that the land be allocated for a residential use. Part of site 38 in the south-east corner is excluded from this submission as it is currently the subject of a current, but as yet undetermined planning application for 23 affordable dwellings for Orbit Homes.

Accompanying this submission are the following Reports:

- Preliminary Ecological Appraisal by MHE Consulting Sept. 2017
- Consideration of Habitat Regulation Assessment (HRA) Issues by Halls Ecology
- Heritage Impact Assessment by Bob Kindred Heritage Consultants
- Landscape and Visual Appraisal by the Land and Sculpture Design Partnership
Preliminary Archaeological Assessment by John Newman

Other detailed technical assessments will be produced before the Council has concluded its assessment of responses to its First Draft Plan Consultation.

In support of NRL’s objection and case to have sites 5/38 allocated for housing several primary evidential reports have been commissioned to establish the true nature of the existing constraints and opportunities that each of these sites presents. Consequently, this representation is supported by and analysis of heritage impact assessment, and ecological appraisal, and a landscape impact assessment. Below ground heritage is given primary desktop consideration supported by the evidence of recent evaluation on part of the site adjacent. Full reports are submitted and we draw the attention of the Council to their conclusions which seemed to be at odds with the superficial assessment given to sites no.5/38 in the initial sustainability appraisal/site assessment from which the First Draft Local plan has evolved. We seek dialogue and discussion with the Council to reconcile differences and to establish/narrow the issues between NRL and the Council, going forward.

There is an unjustified bias in the assessment of the competitor sites i.e. between the cited WLP6 .1 preferred site and sites numbered 5/38. For example, paragraph 6.2 of the FDP under plays the fact that both of the sites, preferred and omitted, are located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

The FDP claims that the preferred site ‘does not extend development further into the countryside to the west than existing development to the north and south’. The submitted landscape and visual impact analysis by NRL comes to a different, more balanced conclusion and in summary it might be said more reasonably, that in landscape impact terms, there is little difference between the two sites in this regard.

In summary, we say that the statement in paragraph 6.2 of the FDP that the development of the preferred site will result in a more limited impact on the landscape than other potential options for growth, is not supported by detailed analysis and evidence.

A preliminary archaeological assessment was carried out by John Newman for NRL who in consultation with Suffolk County Council Archaeological service identifies the need for pre-development evaluation. We can only assume that the same will be required for the preferred allocation site. We do know that from trenching evaluation of the corner of site 5/38 conducted by Oxford Archaeology in 2017 that there was nothing found which prevents the site from being developed and it is therefore reasonable to conclude that it is unlikely that there will be any below ground heritage assets for the adjacent land which would prevent its development. We are not aware that any pre-development determination has been carried out for the preferred site or any reason why it should be considered in a different way in terms of a commitment to pre-development evaluation.
Similarly, there does not appear to have been any detailed heritage impact consideration of the proposed development on the setting of listed buildings and in this case the nearby St Margaret’s Church lying to the west of both sites.

The submitted Bob Kindred Heritage Impact Assessment in relation to a proposal to develop sites 5/38, identifies quite clearly and reasonably concludes that there will be no impact upon views of or from St. Margaret’s Church arising from the development of this land. Whilst a similar assessment of the preferred site is currently being carried out by Bob Kindred for NRL, our landscape assessors advise that the church is much more visible in the landscape from the preferred site than it is from sites 5/38 and thus the impact will be more significant from the development of the preferred site.

A preliminary ecological appraisal of sites 5/38 by MHE Consulting is submitted with this representation. The summary conclusion of that report is that there are significant opportunities for enhancement and biodiversity creation arising from any proposal to develop land together with its strategic, structural landscaping proposals, albeit that such works are primarily works of mitigation in which the opportunity will be taken to enhance habitat and increase biodiversity.

Waveney District Council’s Draft HRA Screening Report has concluded no likely significant effect as a consequence of the proposed housing allocations in the consultation version of the new Local Plan. It is unlikely that this conclusion can be substantiated and it is inconsistent with HRAs for other Local Plans in Suffolk and elsewhere.

With respect to compliance with the Habitat Regulations there is no reason why sites 5 and 38 at Reydon should not be included in the District’s housing allocation through to 2034.

In summary conclusion, therefore we say that the allocation of land on site WLP6.1 for 250 dwellings represents a major incursion into a valued landscape and will result in the loss of agricultural land at 12.24 ha which is potentially significant. There is no evidence presented nor any analysis undertaken to establish whether or not the preferred land to be lost is Grade 3a or another grade and therefore within/without the category of best and most versatile land. Whilst at this point in time, because the NRL agricultural land classification soil analysis is not yet complete, we can say that the soil type is most likely to be similar to that of the allocated site, what we can also say is that the preferred site measures approximately 8.75ha whilst the allocated site preferred site is clearly much larger and therefore as appropriate, potentially represents a greater loss of agricultural land which may be of the best and most versatile category.

In landscape terms, it would be sensible to bisect and reduce the allocation WLP6.1 and reduced it by approx.by 50% to follow the line of the existing development boundary to the north and south of the preferred site and thereby represent more of a rounding off of the existing western settlement edge of Reydon village.

The LSDP submitted landscape impact assessment report’s conclusions are set out in section 4 of the Report. The Council’s assessment of sites 5/38 has been fundamentally disproved.
In terms of a sustainable location the land at sites 5/38 is just as conveniently accessible as is the preferred site in terms of its access via cycling and walking modes to local schools, services, shops and facilities in both Reydon and Southwold.

Para. 6.8 of the FDP infers that the allocation of the preferred land presents ‘a unique opportunity to secure land for the relocation of properties at risk from coastal erosion’. That opportunity of course is not unique as the delivery of land for 7 replacement houses can be achieved anywhere, including on sites 5/38.

Para 6.9 of the FDP Infers that the landscape impact of the proposed development of the site has not been considered in any detail which is in stark contrast to the landscape and visual assessment conducted for sites 5/38 by LSDP. The landscape strategy arising from the combined baseline evidence and assessments of Ecology, Landscape and Heritage from which flows the suggested Masterplan block layout for sites 5/38 within this submission illustrates the point that not only has impact been thoroughly considered in principle, but the results have been applied to the site specific requirements required to successfully integrate the development of sites 5/38 within the local landscape whilst simultaneously presenting significant opportunities for both enhancement to biodiversity and wildlife habitats and to public accessibility to quality open space.

Moreover, Sites 5/38 is capable of delivering a broad range of housing types, mix and density in accordance with section 6 of the National Planning Policy Framework (Delivering a wide choice of high quality homes) and also has the scope for delivering community facilities such as a Nursery (Use Class D1) (we note an existing shortage of preschool nursery places in the locality) as well as some food retail provision commensurate with the retail catchment area requirements of Reydon. For example, a Local food store of approximately 300m² of convenience retail floor space could be successfully accommodated within the site on the frontage to Green Lane.

Para 6.10 of the FDP notes the presence of a grade 2 listed building at Gorse Lodge within the vicinity of the allocation and simply indicates that any new development will need to respect the setting of it ‘as much as is practical.’ The duty of a Local Planning Authority in such circumstances and the weight to be attributed to the protection of heritage assets including their setting is well-known and is rehearsed in the NRL Heritage Impact assessment submitted within this representation. There is no sound reason why the assessment of the impact of development from the preferred site on Gorse lodge should be any less thoroughly executed and considered than is the case for sites 5/38 on a St. Margaret’s Church. Indeed, the preferred site's impact on the same church should also be considered as we conclude that the development of the preferred site will have a greater impact than any arising from the development of sites 5/38.

At Para 6.12 of the FDP, we note that there is nothing either exceptional or unique about the essential requirement to provide appropriate infrastructure, including open-space and children’s play areas as part of normal residential development of an appropriate scale. Just as it is required for the preferred site, so too can it be provided on sites 5/38 but our combined baseline assessments (landscape, ecology and heritage) which identify opportunities as well as constraints, provide for a
positive well planned series of open spaces connecting with the adjacent development area and integrating with the wider countryside and built edge of the village, providing a successful transition between the two (see Master plan layout).

In summary conclusion, we invite the Council to reconsider its position with regard to the allocation of site WLP6.1 and to reconsider the merits of allocating sites 5/38.

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/135139/PDF/-/8714869%201%202017%20Northland%20Reydon%20Landscape%20Final.pdf
R A Palombo

Section

005 | Brambles Drift, Green Lane, Reydon, Southwold

Comment ID

46

Comment

Perhaps it would be a more village friendly way of achieving the Council's housing targets by smaller developments on other smaller sites throughout Reydon.

The village should be enlarged by smaller developments north along Wangford Rd towards sites 5, 38 and 26 and historically the village of Reydon should spread along this road, if at all, as the village originated toward the church & church hall.

Attached documents
Taylor

Section

005 | Brambles Drift, Green Lane, Reydon, Southwold

Comment ID

103

Comment

This site should not be included. All of the sites considered along Green Lane, this, site 26 and site 38, would extend the village with great negative impact north of the current boundary. This, site 5, would have a particularly negative impact by its visual and infrastructure positioning on and at the corner of Green Lane and Wangford Road. The negative impacts and drawbacks of the Green Lane sites reported in the Analysis of the Options for the New Waveney Local Plan [http://consult.waveney.gov.uk/gf2/ti/f/687330/28842277.1/PDF/-/Analysis_of_Options_Consultation.pdf] are considerably severe for site 05.

Attached documents
Comment ID 175

Comment The use of the areas mentioned to the west of Carlton Colville would also have the advantage of commencing the much needed Barnby bends bypass from the roundabout at the end of Castleton Avenue. Areas 7 and 112 on the Beccles Road could be developed as preferred sites as links with the A146 would enable good transport infrastructure.
Graham Hunt

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 75

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
JOHN HARRISON

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 92

Comment - Alternative options: Beccles Road [188,7, 112, 11, 179: these options border existing main road and access to Lowestoft and Beccles/Norwich and therefore may be considered better options for traffic management [Plan WLP2.15].

Attached documents
Mr & Mrs T Lawrence

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 114

Comment Appendix 5 alternative sites. Site 7 and 179 should also be given further consideration in place of policy WLP2.12 Lowestoft Garden Village due to the above concerns.

Attached documents
Mr & Mrs W Deal

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 86

Comment Surely to spread development in a number of locations will lessen the impact on one area and allow both highway and drainage to balance more equally.

We note that land to the west of Beccles Road has not been included and would suggest this be reconsidered as sharing the development area particularly as access would be onto a safer road system and surface water could be discharged directly into the Broads and not Kirkley Stream.

Attached documents
Paul Newson

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 513

Comment
While I think it's very commendable having the new sports fields centre at Oaks farm I think you have overlooked the fact that most of its land is not very level and also the soil type very heavy and doesn't drain very well and gets water logged which is not ideal for sporting activities.

Would it not be better to put the sports facilities on the land along Beccles Road and Burnt Hill lane In your consultative document you state you want this land left open it would also abut the golf course which is also a sporting facility and close to the nature reserve which has many footpaths for those wishing to jog would it not be better, just my ideas, but I don't want to see a football pitch and playing field which you will be unable to play because water logging.

Attached documents
PJ UNDERDOWN

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 212

Comment Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why are they building these properties on the River Waveney side of Beccles Rd. when the Council policy was "no large developments on that side of Beccles Rd." So why is there an "ALTERNATIVE PLOTS shown on that side of Beccles Rd on the new draft map.

Attached documents
PJ UNDERDOWN

Section 007 | Burnt Hill Lane to Marsh Lane, Carlton Colville

Comment ID 232

Comment Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why are they building these properties on the River Waveney side of Beccles Rd. when the Council policy was "no large developments on that side of Beccles Rd.? So why is there an "ALTERNATIVE PLOTS shown on that side of Beccles Rd on the new draft map.

Thankyou Peter Underdown

Attached documents
010 | Cromwell Road, Weston

Gillian Brett

Section 010 | Cromwell Road, Weston

Comment ID 116

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 010 | Cromwell Road, Weston

Comment ID 229

Comment Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.
Rachel Ducker

Section 010 | Cromwell Road, Weston

Comment ID 62

Comment After reading the first draft, I would like to express that as a resident from Ringsfield, I do not agree on building new homes on the proposed "alternative areas" within Ringsfield.

I do not feel it would be a positive move for the village.

The reasons for this is that at present I do not feel the village has the infrastructure to support such an idea and by creating new infrastructure I believe that this will have a dramatic impact on the traffic in and out of the village.

We live on Cromwell Road and already suffer from high traffic levels and excess speeding on a daily basis, so have concerns that this will not only increase traffic levels further but will create more problems for speeding causing danger to local residents, especially with the new relief road being built, which will no doubt also have a high impact.

On the point of the new relief road, there are also concerns about flooding in certain areas, which we hope you will research and take into consideration.

I have copied in our Parish Council so that they have note on this correspondence and thank you for your time.

Attached documents
011 | Cromwell Road, Ringsfield, Beccles Opposite 1
Rose Villa

Gillian Brett

Section 011 | Cromwell Road, Ringsfield, Beccles Opposite 1 Rose Villa

Comment ID 235

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
JOHN HARRISON

Section 011 | Cromwell Road, Ringsfield, Beccles Opposite 1 Rose Villa

Comment ID 93

Comment - Alternative options: Beccles Road [188,7, 112, 11, 179: these options border existing main road and access to Lowestoft and Beccles/Norwich and therefore may be considered better options for traffic management [Plan WLP2.15].

Attached documents
Mark Brett

Section 011 | Cromwell Road, Ringsfield, Beccles Opposite 1 Rose Villa

Comment ID 227

Comment Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
Rachel Ducker

Section | 011 | Cromwell Road, Ringsfield, Beccles Opposite 1 Rose Villa

Comment ID | 63

Comment

After reading the first draft, I would like to express that as a resident from Ringsfield, I do not agree on building new homes on the proposed "alternative areas" within Ringsfield.

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On the point of the new relief road, there are also concerns about flooding in certain areas, which we hope you will research and take into consideration.

I have copied in our Parish Council so that they have note on this correspondence and thank you for your time.

Attached documents
013 | Fairview Farm, Norwich Road, Halesworth

Michael Fagg

Section 013 | Fairview Farm, Norwich Road, Halesworth

Comment ID 1219

Comment Re Site WLP4.2 off Roman Way Halesworth. The planners have issued the invitation to suggest what may be a more suitable site. This would have been done earlier in the Local Plan Process, but this site was not in the previous consultation (2016) suggested allocations.

Site 013, the Fairview Farm site, on the Norwich Road, is being put forward here as a more suitable site.

First to deal with the three main reasons given in the proposed Local Plan for discounting the Site 013:

1. "Residential development in this location would result in an unnatural extension to the residential part of the town and could conflict with adjacent industrial uses."

The Fairview Farm site would not be an unnatural extension to the residential part of the town – there are already houses (and a new-build under construction) on this stretch of the Norwich Road, unlike Chediston Street where there are no homes beyond Roman Way. There is also already a housing estate for 22 houses currently being built immediately to the south on Fairview Road/Norwich Road that presumably Planning have not regarded as in "conflict with adjacent industrial uses" which are directly opposite,

2. "Development would also have the potential to impact upon the setting of a listed building and impact upon biodiversity."

The impact on the listed building "cannot at this stage be ascertained" and the biodiversity is noted as a minor negative. The draft Strategic Housing and Economic Land Availability Assessment did not identify any constraints that cannot be mitigated.
3. "Alternative sites in Halesworth are more accessible to town centre services and facilities."

Presumably this is partly in reference to the site off Roman Way, Site WLP4.2, which is not nearer the town services and facilities, though it may be nearer some of the town centre shops. Fairview Farm is closer to the Surgery, the Primary School, the Station and the Health and Sports facilities, proposed for the Site WLP4.1, are just a stone's throw away to the south. There is a cycle path practically all the way to the Primary School and the site is directly on the Bus route to the High School in Bungay. The site is also closer to, in fact is on the doorstep, of the industrial and commercial estates on the Norwich Road giving rise to employment opportunities.

Housing on Fairview Farm, being nearer to potential sport facilities and the industrial sites for employment, "will help attract younger, working age, people to the town and provide more balance to the demographics of the population" and as such would satisfy the local plan strategy for the town which Site WLP4.2 does not. In addition there is potential on the site for some industrial development.

The site is only 15 minutes away from the Fitness and Swimming Pool facilities in Bungay (this compares to 25 minutes from Roman Way) and it is more convenient for shopping in the larger town of Beccles.

Other points to take into consideration in preferring site 013 would be that

* Site WLP4.2 is the only site in Halesworth with a Red archaeological alert;

* there is also a historical town dump on the south of the site with possible contamination to deal with;

* there would be Highways issues with regard to accessing and leaving the site on Roman Way (possibly with a new roundabout) and with regard to increased traffic where Dukes Drive meets London Road – already a problematic junction at busy times. Fairview Farm on the other hand could be accessed by vehicles (and by building contractors) from Sparrowhawk Road with no Highways issues;

* there is a flooding concern that there will be a greater risk of pluvial flooding as a result of surface run off from the WLP4.2 site as it will drain into the Blyth tributary which is the main cause of flooding in the town; the surface water sewer network in this area already fails to cope in severe storm conditions and on a large site such as this the loss of drainage to ground infiltration will be significant. Hopkins Homes were required to build
a holding reservoir on the flood plain to try to alleviate this in 2001 but to little effect;

* the Roman Way site is "a large site and would be visible from a considerable distance, which has the potential to harm the wider landscape and the urban fringe." (Landscape Sensitivity Study) The Fairview Farm site on the other hand "is not particularly visible because it is fairly flat and overgrown so it makes only a limited contribution to the landscape." (Summary of Draft Strategic Housing and Economic Land Availability Assessment);

* there must be some concern from the costs incurred by some of the above issues, together with the community infrastructure levy for this site, that the developer may renege on any affordable housing commitments made as the site becomes more and more expensive to develop;

* Roman Way is a strong and obvious settlement boundary for the west of Halesworth beyond which there is nothing to stop urban sprawl continuing. Sparrowhawk Road to the north could provide a similar permanent settlement boundary and would match the industrial boundary on the other side of the Norwich Road. It seems important to keep, as far as possible, the integrity of Halesworth as a defined market town intact – this is already to some extent lost in the merging of Halesworth and Holton to the east.

Attached documents
Mrs S Orton

Section 013 | Fairview Farm, Norwich Road, Halesworth

Comment ID 109

Comment Having looked at your alternative options I would have liked you to consider the small sites as they would not impose so much on the town. Sparrowhawk road to the North of the town next to sites 76 13 and 102 should be considered as the road is hugely underused and currently provides good access to the town because of the roundabout by the Triple Plea and the prospect of employment at WLP4.5.

Attached documents
Mrs S Orton

Section 013 | Fairview Farm, Norwich Road, Halesworth

Comment ID 26

Comment It makes sense to use the smaller proposed sites. Sparrowhawk Road off sites 13, 76 and 102 would not interfere so much with other housing as it is a little used road and would have better access.

Attached documents
014 | Field, Saxon Way, Halesworth

Anonymous

Section 014 | Field, Saxon Way, Halesworth

Comment ID 15

Comment I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

Attached documents
Barbara Langley

Section 014 | Field, Saxon Way, Halesworth

Comment ID 25

Comment I am puzzled by an area shown as 'alternative option' on one map (14) which looks as if it is on the Town Park, east of Saxon's Way. But on the big 'draft' map, these alternatives are not shown. Surely no one is proposing to build houses on the Town Park.

Attached documents
Gerald King

Section 014 | Field, Saxon Way, Halesworth

Comment ID 151

Comment Regarding my Halesworth site reference 14, an up to date flood risk assessment has recently been carried out and a copy is attached.

Flood Risk Assessment conclusion

The specialist Engineers report indicates 4450 square metres of the field is suitable for development in the 1000 year flood risk assessment.

Utilities infrastructure :-

The electrical cables which cross my field could be installed underground as part of any development infrastructure works.

There is also a sewer passing through the field so any development foul water disposal is not an issue. The land is large enough to re-route the sewer within the field if it is too close to any new development with Anglian Water agreement.

The field has recently been flailed mower cut and is now more accessible for viewing.

Attached documents
016 | Former Beccles Heat Treatment, Gosford Road, Beccles

David Bennett

Section 016 | Former Beccles Heat Treatment, Gosford Road, Beccles

Comment ID 6

Comment
This land, together with the vacant plot to the west, and north of the Roys supermarket, are derelict. They are a blot on the Beccles townscape and should be sympathetically developed. The land is close to the town centre and has good road access. The land is suitable for a mixed use of retail, housing, and other suitable activities. It is a brownfield site which should have priority for development, as opposed to greenfield sites. Some of the adjacent old industrial buildings are of poor quality and could be advantageously re-developed as part of a wider development to include the vacant land.

Attached documents
019 | Halesworth Road, Redisham

Marie Smith

Section 019 | Halesworth Road, Redisham

Comment ID 52

Comment I think that the location of this land is ideal for two or three small starter homes as there are properties next to and opposite the land, and it should be reconsidered for development

Attached documents
020 | Hall Road, Blundeston

Blundeston & Flixtion Parish Council Sarah Wells

Comment ID 55

Comment

We strongly agree with your conclusions that this site would have an adverse impact on the landscape and character of the village. It is prime agricultural land and is totally unsuitable for inclusion for housing development in this local plan. It is a small triangular incursion of land into the large field considered at site 190 below.

Attached documents
Isaac Francis

Section 020 | Hall Road, Blundeston

Comment ID 69

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
021 | Hall Road, Carlton Colville

Russel Hubbard

Section 021 | Hall Road, Carlton Colville

Comment ID 87

Comment [In regards to the proposed 800 homes off The Street, Carlton Colville] The 3 smaller alternative options (no. 21, 56, 80 and 178), will be better options as the traffic will be dispersed on to several different roads

Attached documents
Warnes & Sons LTD B Warnes  
Wheatman Planning Ltd. (Deirdre Linehan)

Section 021 | Hall Road, Carlton Colville

Comment ID 148

Comment Following on from the comments we have submitted in respect of the First Draft Plan we wish on behalf of our client and the landowner Warnes & Sons Ltd. to strongly object to the exclusion of site ref, 021 Land at Hall Road Carlton Colville from the First Draft Plan. It is considered that the reasons offered by the Council for discounting further consideration of this site from being allocated for residential use can be readily overcome and mitigated against and we will expand further on this point later in our statement.

While it is acknowledged that the Housing White Paper is only in draft form it is considered that respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the First Draft Plan has paid insufficient regard to this advice in not allocating sufficient medium sized sites such as that put forward by our client.

We consider sound planning arguments were set out in the earlier submissions that were made in response to the "Call for Sites" and the "Issues and Options" consultations undertaken by WDC during 2015 & 2016 which lent strong support to the site being included within the new Local Plan as a residential allocation. To summarise the favourable points that were made include the following:

• The site is well related to the existing urban edge and built up area of Carlton Colville. It will round off the exiting line of development that extends along the western boundary of the site in line with Carlton Colville Community Centre and the associated playing fields immediately to the north of the site and residential development found off Secret Close and Fairhead Loke to the South of the site.

• The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy
walking distance of the site.

- The site is in single ownership and is owned by an established and reputable local builder. It has been unused for over 10 years and is readily available for development. These are critical considerations particularly when it is well known that sites which are in multiple ownership can often be a constraint to delivery.

- The site is not constrained in any way by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development.

- Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

Carlton Colville is clearly identified within the Local Plan as an area that is appropriate for additional residential development and our client’s site is extremely well located in relation to the many services and facilities available locally. All are within walking or cycling distance of the site allowing the site to be considered a very sustainable option for development. There is also good access to public transport facilities with bus stops being found in the immediate vicinity of Hall Road providing regular services to Lowestoft and other surrounding towns and villages. The development of this site from a transport perspective therefore is also extremely sustainable and the location of the site will mean there will not be undue reliance on private cars to access everyday requirements.

In the Council’s appraisal of the site it is stated that there are currently significant issues with traffic movements associated with Carlton Colville Primary School that would be difficult to mitigate through the development of this site in isolation. No specific evidence has been provided of what these issues are and neither has there been any adverse comment from Suffolk County Council as Highway Authority. We do not believe the development of this site is unacceptable as a consequence of traffic issues and consider rather that there are ways in which traffic improvements can be achieved through the development of this land that will be of wider benefit locally. Our client is agreeable for example to allow road widening along the full length of the land in his ownership to improve the flow of traffic along this stretch of Hall Road. This road widening could also incorporate the provision of a footpath along the western side of Hall Road thereby improving pedestrian facilities in this location.
The question must also be asked however why the development of the proposed allocation WLP2.15 will not also exacerbate existing traffic issues and to a much greater degree being a considerably larger development of up to 800 houses. While the indicative masterplan shows provision for parking within the allocation for the existing Carlton Colville Primary School which could relieve on street parking and congestion on local streets near the school this not does not address the issue of congestion and traffic flow along The Street. With potential accesses through Low Farm Drive and Shaw Avenue from this site the additional traffic generated from these locations will in our opinion add significantly more to the congestion on The Street than would be generated by the development of our clients site.

The Council asserts that our client’s site is not of a scale to deliver any on site infrastructure improvements. There are many benefits however that can be achieved from the development of this site including the delivery of up to 40 much needed affordable dwellings. There would also be significant CIL contributions arising from the development that could be used towards the improvement of existing infrastructure and the provision of new facilities locally. Mention has previously been made of our clients willingness to carry out road widening along Hall Road to help improve traffic flow in the vicinity of the site. Open space and recreational facilities in line with current local plan policy requirements will also be included as part of any development proposal. It is misleading therefore to exclude reference to the many benefits locally that could arise from this development and to focus only on the fact that there is unlikely to be any major on-site infrastructural improvements that can only be achieved by large scale allocations.

The Council states ".... The Site is considered less favourably to the site allocated under Policy 2.15 of the First Draft Local Plan and the other preferred sites in Lowestoft for residential development".

We consider therefore our clients land has been too readily dismissed by the Council in favour of the larger allocation WLP2.15. This allocation is made up of two separate sites that form part of Bell Farm. In contrast to our clients land, and we remain of the opinion that the correct classification of the land is Grade 2, which has not been used in any capacity for over 10 years, Bell Farm is a working farm of Grade 2 Classification. The development of the allocation will therefore see almost 55ha of agricultural land being taken out of production. A similar argument can be made against the large allocation in north Lowestoft that will see 77ha of active agricultural land being taken out of production. It therefore seems
contradictory of the Council to use the argument in the case of our clients land that "... the development of this site would result in an unnecessary loss of undeveloped land.." when surely the same circumstances apply to the majority of the proposed allocations.

Furthermore as has been demonstrated earlier in this response the two large allocations WLP2.12 and WLP2.15 have numerous unresolved constraints that could limit both the start of development and also the number of houses delivered. These factors include access, drainage, existing on-site infrastructure and archaeological potential. Again in contrast there are no known constraints which apply to our clients land that might delay development or significantly reduce the number of dwellings delivered.

In response to the preliminary comments made by SCC Archaeology team following the Call for Sites consultation a full archaeological Desk Top study of our clients land was undertaken by Archaeological Solutions. Following this a Geophysical scan of the land was undertaken by Stratascan Sumo. The results of these investigations were forwarded to SCC Archaeology and they indicated that trial trenching of parts of the site could be dealt with by way of a condition attached to any planning permission. In contrast the two large allocations as yet have had no formal archaeological investigations despite SCC indicating parts of both allocations had potential for red/amber impact and would need to be subjected to detailed archaeological evaluation.

Furthermore there is a Scheduled Ancient Monument (SAM) in the form of a Moated site located within WLP2.15 and Historic England has highlighted the potential for residential development to greatly impact on the setting of the monument. While the proposed masterplan for the site shows the SAM located within open space it will be surrounded by residential development to the south and east which would have far greater impact on its setting than any development on our clients land is likely to have. The proposed residential areas immediately adjoining the SAM are also likely to have high archaeological potential.

In conclusion it is believed it has been demonstrated the housing strategy proposed by the Council within the First Draft Plan places it at risk of failing to meet its annual housing target. Conversely it has also been shown, more than adequately, that our clients land at Hall Road represents an eminently suitable site for inclusion as a residential allocation within the new Waveney Local Plan. It is a medium sized site, favoured by the Government in their recent draft White Paper on Housing as a means of delivering
homes quickly, in a suitable and sustainable location. We believe therefore it has been unfairly discounted by the Council and we have shown clearly that it is possible to overcome and mitigate against any of the constraints identified by the Council and used as reasons for not including the site as a residential allocation.

Attached documents  
022 | Hammonds Farm, London Road, Gisleham, Lowestoft

Wellington Construction Ltd Paul Pitcher
MDPC Ltd (Malcolm Dixon)

Section 022 | Hammonds Farm, London Road, Gisleham, Lowestoft

Comment ID 136

Comment LPA Position-Poor Relationship to Residential Areas

Response

* Linear development on London Road and although not necessary, there is the added advantage that this site could be linked to failed land bid sites to south Site No’s 147 & 98

* Established Housing to the north east –Willow Rd and Jubilee Rd and to north of Arbour Lane and an industrial estate/supermarket to the west-offering a very sustainable location

* Relates better than New Village, Corton / Hopton to built up area without impacting materially on Strategic Gap

* School capacity issues around Pakefield PS-alternative could be made available through the Carlton Colville/Rushmere Site (LPA ref WLP2.15) which includes a new Primary School. If the catchment area was altered then this school is only 2.5 miles away

* Developer would offer smaller starter homes and self build opportunities

* This site is more sustainable and deliverable than the promoted and ambitious "Garden Village" site identified between Corton & Hopton (LPA ref WLP 2.12) with much less impact on the Strategic Gap (the status afforded to both areas under the present adopted Local Plan).

* Furthermore the Hammonds site could deliver housing relatively quickly whereas the site WLP 2.12 has a long lead in time to become fully established and as there is pressure for Housing generally as well as
Affordable, Starter Homes and Self Build then this site offers an opportunity to help reduce this pressure particularly around Lowestoft where there are deliverability issues as demonstrated by the slow progress around Lake Lothing.

* The archaeological and ecological requirements would be undertaken as required under the WDC "Analysis of the Options for New development"- (July 2017)

General Overall Summary

* The bigger sites, Hammonds & Barnby offer opportunities to build swiftly in sustainable locations, and all 3 sites can help alleviate pressure on demand for general, affordable, starter and self build homes in the WDC area.

* In our opinion improvements to car fuel efficiency will broaden the case for sustainability considerably

Attached documents
023 | Holly Farm, Wood Lane, Oulton, Lowestoft

Mr and Mrs Waring

Site 23, Holly Farm, Oulton has been discounted for the following reason;
"Due to the lack of safe pedestrian access to the site and the impact on the landscape and of the setting on the Broads, the site is not considered suitable for allocation"

The Analysis of the "Options for the new Waveney Local Plan | July 2017" provides further information as to why this conclusion was reached.

1. I would request that this conclusion to discount Site 23 is reconsidered as it is based upon some factually inaccurate or incomplete information.

2. It also has inconsistent conclusions as compared with other similar Sites which have been approved for allocation in the new Waveney Local Plan.

3. Further, the analysis of the site did not take account of the potential to reduce the impact on the landscape and improve its setting on the Broads, and connection to a long distance footpath.

4. Finally, the analysis does not take into account how Site 23 will need to remain viable and consequently have ongoing impact on the landscape and of the setting on the Broads.

Comments are as follows;

Inaccurate or Incomplete Information.

• The site is not only accessed from Wood Lane, but is also accessed from the surfaced and adopted Holly Hill, Camps Heath. Allocated Sites 7.5, 7.6, 7.18, 7.19, 7.20 have similar access.

• The site has safe pedestrian access as it is traversed by a Public Footpath connecting to existing Camps Heath village facilities. Allocated Sites 7.18,
7.19, 7.20 have similar access.

- The site is adjacent and contiguous to the built up area of Camps Heath and not solely in open countryside. Allocated Sites 7.5, 7.6, 7.18, 7.19, 7.20 have similar locations.

- The site is partly "brown field" as it has a business rated livery yard, existing residential use and numerous dominating, large scale, redundant structures. Allocated site 7.5 has similar brownfield potential.

- No account of the development of the adjacent Woods Meadow Country Park with its safe pedestrian access is made.

- A Bus Stop, Primary School, Playground, Country Park, Shops, Sports Facilities are all within walking distance on existing or proposed pedestrian paths.

Inconsistent Conclusions

- Sites 7.4, 7.6, 7.7, 7.18, 7.19, 7.20 have been allocated despite no footpath or limited pedestrian access.

- Sites 7.6, 7.7, 7.15, 7.16, 7.17, 7.18, 7.19, 7.20, 7.21 have been allocated on agricultural land adjacent to villages.

- Sites 7.5, have been allocated taking account existing "brown field" development in a village.

- Various sites are allocated in the new Local Plan aim to support the local economy.

- Sites allocated in 7.15, 7.16, to provide opportunity for small number of buildings in scale and character with village Potential to Reduce Landscape impact and improve Setting on Broads.

- The site as it currently exists has many poor quality, prominent and high buildings covering the majority of the elevated site, which are visible from a considerable distance over Broads landscape. The proposal would seek to remove a number of the most landscape prominent buildings, and aim to replace them with a fewer number of well designed, environmentally efficient buildings, so placed as to be sensitive to landscape concerns and lead to a significant improvement to the Landscape and Broads setting. The new Waveney Local Plan has not explored this valuable opportunity and improvement to the local natural environment.
Ongoing Viability of the Site.

- The Site with its mainly redundant, poor quality, prominent buildings in an elevated, highly visible position will need to determine an economically viable future during the Local plan period. In the absence of the proposed considerate smaller scale mixed residential/tourism development, the alternative commercial or ongoing redundancy of the existing buildings may have similar or worse impact upon the landscape and access.

Summary.

It is proposed that significant, long term benefits to landscape and setting of the Broads could be achieved. Additionally, improvements to local housing and the economic viability of Site 23 could be realised through removal of some of the current dilapidated and poor quality structures, to be replaced by a smaller scale, well designed and discretely positioned development. A small scale development would be anticipated to have lesser impact upon highway and pedestrian infrastructure than other alternatives.

Attached documents
024 | Homestead Farm, Ringsfield Road, Beccles

Jane Leather

Section 024 | Homestead Farm, Ringsfield Road, Beccles

Comment ID 217

Comment

We support the decision to discount each of the sites along Ringsfield Road (marked on the Waveney First Draft Local Plan as Nos. 24, 174 and 145). They are unworthy of further consideration due to the valid reasons that have been put forward by Beccles for all three to be discounted and agree that the preferred sites for development are significantly more suitable.

In the evaluation process it has already been identified that Ringsfield Road would be a totally unsuitable access route for the Alternative Site proposal. The part of Ringsfield Road to the Western boundary of the Alternative Sites connects bridleways from Primrose Lane to Cut Throat Lane (Hangman's Lane) and is regularly used by horse riders, cyclists and walkers. This is a narrow road with a sharp bend and hedges and there is consequently poor vision. A significant increase in volume of traffic would make it even more congested and hazardous for horse riders, cyclists, walkers and motorists.

The Alternative site in question includes Grade II Agricultural Land and it would seem irrational to build on productive agricultural land and lose it to housing for the future. Development of this Alternative site would also bring a significant impact on the rural landscape, long established hedges and wildlife.

Attached documents
John Hill

Section 024 | Homestead Farm, Ringsfield Road, Beccles

Comment ID 220

Comment The Waveney Local Plan identifies some alternative sites along Ringsfield Road for industrial and housing development. These are sites 24, 174 and 145. We support the council’s decision to discount these sites, for the considered reasons already given and would like to offer some additional validation for rejecting these sites.

The western boundary of these sites, Ringsfield Road, is a narrow road with two 90 degree bends which have poor visibility. We have witnessed a number of near miss collisions at these bends. This section of Ringsfield Road is used frequently by horse riders, dog walkers and cyclists. There would be a significant increase in traffic volume, should these sites be developed, with a far greater probability of traffic accidents.

These sites include valuable Grade II Agricultural land and hedgerows, which provide a natural habitat for a variety of wildlife. These would all be lost were these alternative sites to be developed and the Western approach to Beccles would lose its rural landscape.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section 024 | Homestead Farm, Ringsfield Road, Beccles

Comment ID 182

Comment The alternative option sites identified to the West of Beccles, numbered 145, 174 and particularly 24 are not considered suitable sites as they are not supported by the relevant services, current infrastructure and can be viewed as prime agricultural land. Again there is a desire to have a clear land boundary between Beccles and Ringsfield to avoid the sense of Ringsfield becoming a satellite of Beccles or being 'swallowed' by the town.

Attached documents
The Waveney Local Plan has identified parcels of land that are potentially suitable for development to fulfill the future needs for housing and employment across the District. Preferred and alternative sites have been considered in Beccles including sites along Ringsfield Road identified as 24, 174 and 145 on the Draft Local Plan document. I support the decisions that each of these sites has been discounted for a number of considered, appropriate and valid reasons and would like to add some additional considerations to further validate the decisions.

These sites include Grade II agricultural land, long established hedgerows and mature trees in a small field setting. The loss of habitat and the impact on the rural landscape would be significant should this land be developed. It might also be considered that with the uncertainty of the outcome of Brexit negotiations and the possible impacts on agricultural policy and food production in the UK it would indeed be shortsighted to permanently lose highly productive agricultural land to housing.

It has been correctly identified during the evaluation process that Ringsfield Road is not a suitable access route for these sites. The road passes John Leman School, already a bottleneck during school opening and closing times and also on Saturday mornings during sports practice on the playing fields opposite the school. Additional traffic on this route would lead to more congestion and increased exhaust emissions past the school and playing fields. Exhaust emissions and the effects on air quality particularly near schools is a matter of concern for health professionals and authorities.

The section of Ringsfield Road delineating the western boundary of the Alternative Sites forms the connection between bridleways at Primrose Lane and Hangman’s Lane and is in frequent and regular use by horse riders and dog walkers. This narrow country road with hedges lining the verge can already be somewhat hazardous at existing traffic volumes. Any further increase in traffic along Ringsfield Road will only augment the hazard to
walkers and horse riders.

Part of the National Cycle Route follows Ringsfield Road proceeding from Beccles past these sites and continues on through Ringsfield Village and along School Road. Cycling is fast growing in popularity in the UK and is being encouraged for health and environmental reasons. Increased traffic density on a frequently used section of this designated National Cycle Route would compromise these aims.

The existence of better served more suitable sites to meet the needs of Beccles development should enable Waveney to choose those preferred sites and preserve green field countryside for future generations.

Attached documents
Rosemary Shaw

Section 024 | Homestead Farm, Ringsfield Road, Beccles

Comment ID 158

Comment I welcome the discounting of site 24 for the reasons specified. Vehicular access could only be obtained via Ringsfield Road rather than London Road - and would thus not connect with the Beccles Southern Relief Road, increasing traffic flowing contrary to the direction envisaged by the relief road. The road is minor and forms part of National Cycle Route number 1.

Attached documents
Susan Doherty

Section 024 | Homestead Farm, Ringsfield Road, Beccles

Comment ID 209

Comment
Plots 145, 43, 156, 24, and 108 surface water will no doubt be directed into the main storm drain which runs, from M and H plastics, under the railway line at Gosford Road, through to the lagoon at Morrisons and eventually to the river. Should this be the case, the heightening of this gully will be essential, as the last time this was done was during the 1960’s. This is Anglian Water’s responsibility.

Attached documents
**026 | Jubilee, Green Lane, Reydon**

**Clive Tickner**

**Comment ID** 4

**Comment**
A thoroughly unsuitable site. The application provides a faulty address, it should read Rissemere Lane East for that plot of land and not Green Lanes, unless it plans to knock down one or two existing large houses, which rather negates the point of providing housing. Otherwise the only pedestrian or traffic access would have to be via Rissemere Lane, which incredibly narrow and which currently provides safe walking for dogs and their owners, for riders and their horses and the cyclists on a designated route. Such an inappropriate development would also be a major intrusion into the AONB and would involve the removal of a considerable number of established trees already on that site.

**Attached documents**
R A Palombo

Section 026 | Jubilee, Green Lane, Reydon

Comment ID 48

Comment
Perhaps it would be a more village friendly way of achieving the Council’s housing targets by smaller developments on other smaller sites throughout Reydon.

The village should be enlarged by smaller developments north along Wangford Rd towards sites 5, 38 and 26 and historically the village of Reydon should spread along this road, if at all, as the village originated toward the church & church hall.

Attached documents
Taylor

Section 026 | Jubilee, Green Lane, Reydon

Comment ID 105

Comment This site should not be included. All of the sites considered along Green Lane, this, site 05 and site 38, would extend the village with great negative impact north of the current boundary.

Attached documents
027 | Land (off) The Loke, Blundeston, Lowestoft

Blundeston & Flixton Parish Council Sarah Wells

Section 027 | Land (off) The Loke, Blundeston, Lowestoft

Comment ID 57

Comment We totally agree with your comments and conclusions regarding this small, isolated, site on the northern edge of the Village. A housing development here of around eight dwellings, off an un-adopted Lane would not provide any significant benefit for the community compared to the two preferred sites agreed. We note that this site is adjacent to WLP 7.4 but feel that because of the landscaping and ecological impact of development in this area consideration must not be given to combining the two sites.

Attached documents
Isaac Francis

Section 027 | Land (off) The Loke, Blundeston, Lowestoft

Comment ID 67

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
029 | Land adjacent Millennium Green, Church Road, Blundeston

Blundeston & Flixton Parish Council Sarah Wells

Section 029 | Land adjacent Millennium Green, Church Road, Blundeston

Comment ID 58

Comment We totally agree with your conclusion that this site is unsuitable for inclusion as housing development in this local plan. Although the site is in the heart of the village it is an important open space and as such compliments the adjacent Millennium Green of which the Village is very proud. Again this is high quality agricultural land and should be retained for that purpose. Any development here would also seriously impact on adjacent listed buildings, which includes the Church. Access to and from this site would also seriously impact on the local infrastructure.

Attached documents
Isaac Francis

Section 029 | Land adjacent Millennium Green, Church Road, Blundeston

Comment ID 66

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
030 | Land adjacent to Elms Lane, Wangford

Crawford

Section 030 | Land adjacent to Elms Lane, Wangford

Comment ID 96

Comment

The alternative Option No 30 (only found in your summary newspaper but not in the other documents) on Elms Lane seems to be for everybody we have spoken to in the village a much better option for several reasons:

1) Far better access to the village and the A12 (under WLP 7.7 Elms Lane would have to be modified anyway).

2) Better placed for incoming services sewage, gas, electric etc.

3) The development all under one scheme in the same place leading to less disruption for the village as a whole and indeed Reydon/Southwold.

4) No impact from surface water in terms of land drainage.

5) Easier access to services within the village eg pavements already in situ.

6) Less traffic along Norfolk Road which is already the busiest over used road in the village.

Attached documents
036 | Land at Cromwell Road and London Road, Weston

Gillian Brett

Section 036 | Land at Cromwell Road and London Road, Weston

Comment ID 117

Comment

Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 036 | Land at Cromwell Road and London Road, Weston

Comment ID 225

Comment Serous consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section 036 | Land at Cromwell Road and London Road, Weston

Comment ID 179

Comment The alternative sites proposed on the Western end of the Southern relief road, marked as sites 124, 107 and 36 are not considered suitable as the infrastructure and services are not available in this locality to support development. It has been commented that a distinct tract of land should separate the Beccles and Worlingham Garden Neighbourhood to maintain the rural aspects of both Ringsfield and Weston Parishes.

Attached documents
038 | Land at Green Lane, Reydon

Clive Tickner

Section 038 | Land at Green Lane, Reydon

Comment ID 5

Comment I agree that this would have an enormous impact on the AONB, reducing greatly this valuable asset that appears constantly to be under threat. With two large parcels of land on each side of the road just beyond Mights Bridge as one enters Southwold (The Halesworth Road, A 1095 / Station Road) it seems bizarre to be looking at AONB farmland for housing instead of building on existing, unused residential sites.

Attached documents
The following paragraphs constitute the representations made on behalf of Northland Reydon Ltd. (NRL) to the omission/exclusion of potential development sites reference 5/38 in the Waveney First Draft Local Plan 2017, on land north of Green Lane, Reydon, Suffolk. For the avoidance of doubt this constitutes and objection to the provisions of the Plan.

Previous initial representations made by others to the Council proposed the allocation of the land which is in two ownerships but two contiguous sites on the north side of Green Lane on the north side of the village of Reydon. NRL is the option holder and developer for the land working in conjunction and full agreement of the landowners with a common objective of delivering the land for primarily residential development and appropriate infrastructure.

In combination, the sites measure approximately 8.7ha. of land which is partly in agricultural use with the balance in recreational use (equitation). Previous submissions proposed that the land be allocated for a residential use. Part of site 38 in the south-east corner is excluded from this submission as it is currently the subject of a current, but as yet undetermined planning application for 23 affordable dwellings for Orbit Homes.

Accompanying this submission are the following Reports:

- Preliminary Ecological Appraisal by MHE Consulting Sept. 2017
- Consideration of Habitat Regulation Assessment (HRA) Issues by Halls Ecology
- Heritage Impact Assessment by Bob Kindred Heritage Consultants
- Landscape and Visual Appraisal by the Land and Sculpture Design
Partnership

Preliminary Archaeological Assessment by John Newman

Other detailed technical assessments will be produced before the Council has concluded its assessment of responses to its First Draft Plan Consultation.

In support of NRL’s objection and case to have sites 5/38 allocated for housing several primary evidential reports have been commissioned to establish the true nature of the existing constraints and opportunities that each of these sites presents. Consequently, this representation is supported by and analysis of heritage impact assessment, and ecological appraisal, and a landscape impact assessment. Below ground heritage is given primary desktop consideration supported by the evidence of recent evaluation on part of the site adjacent. Full reports are submitted and we draw the attention of the Council to their conclusions which seemed to be at odds with the superficial assessment given to sites no.5/38 in the initial sustainability appraisal/site assessment from which the First Draft Local plan has evolved. We seek dialogue and discussion with the Council to reconcile differences and to establish/narrow the issues between NRL and the Council, going forward.

There is an unjustified bias in the assessment of the competitor sites i.e. between the cited WLP6 .1 preferred site and sites numbered 5/38. For example, paragraph 6.2 of the FDP under plays the fact that both of the sites, preferred and omitted, are located within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).

The FDP claims that the preferred site 'does not extend development further into the countryside to the west than existing development to the north and south'. The submitted landscape and visual impact analysis by NRL comes to a different, more balanced conclusion and in summary it might be said more reasonably, that in landscape impact terms, there is little difference between the two sites in this regard.

In summary, we say that the statement in paragraph 6.2 of the FDP that the development of the preferred site will result in a more limited impact on the landscape than other potential options for growth, is not supported by detailed analysis and evidence.

A preliminary archaeological assessment was carried out by John Newman for NRL who in consultation with Suffolk County Council Archaeological service identifies the need for pre-development evaluation. We can only
assume that the same will be required for the preferred allocation site. We do know that from trenching evaluation of the corner of site 5/38 conducted by Oxford Archaeology in 2017 that there was nothing found which prevents the site from being developed and it is therefore reasonable to conclude that it is unlikely that there will be any below ground heritage assets for the adjacent land which would prevent its development. We are not aware that any pre-development determination has been carried out for the preferred site or any reason why it should be considered in a different way in terms of a commitment to pre-development evaluation.

Similarly, there does not appear to have been any detailed heritage impact consideration of the proposed development on the setting of listed buildings and in this case the nearby St Margaret's Church lying to the west of both sites.

The submitted Bob Kindred Heritage Impact Assessment in relation to a proposal to develop sites 5/38, identifies quite clearly and reasonably concludes that there will be no impact upon views of or from St. Margaret's Church arising from the development of this land. Whilst a similar assessment of the preferred site is currently being carried out by Bob Kindred for NRL, our landscape assessors advise that the church is much more visible in the landscape from the preferred site than it is from sites 5/38 and thus the impact will be more significant from the development of the preferred site.

A preliminary ecological appraisal of sites 5/38 by MHE Consulting is submitted with this representation. The summary conclusion of that report is that there are significant opportunities for enhancement and biodiversity creation arising from any proposal to develop land together with its strategic, structural landscaping proposals, albeit that such works are primarily works of mitigation in which the opportunity will be taken to enhance habitat and increase biodiversity.

Waveney District Council’s Draft HRA Screening Report has concluded no likely significant effect as a consequence of the proposed housing allocations in the consultation version of the new Local Plan. It is unlikely that this conclusion can be substantiated and it is inconsistent with HRAs for other Local Plans in Suffolk and elsewhere.

With respect to compliance with the Habitat Regulations there is no reason why sites 5 and 38 at Reydon should not be included in the District’s housing allocation through to 2034.

In summary conclusion, therefore we say that the allocation of land on site
WLP6.1 for 250 dwellings represents a major incursion into a valued landscape and will result in the loss of agricultural land at 12.24 ha which is potentially significant. There is no evidence presented nor any analysis undertaken to establish whether or not the preferred land to be lost is Grade 3a or another grade and therefore within/without the category of best and most versatile land. Whilst at this point in time, because the NRL agricultural land classification soil analysis is not yet complete, we can say that the soil type is most likely to be similar to that of the allocated site, what we can also say is that the preferred site measures approximately 8.75ha whilst the allocated site preferred site is clearly much larger and therefore as appropriate, potentially represents a greater loss of agricultural land which may be of the best and most versatile category.

In landscape terms, it would be sensible to bisect and reduce the allocation WLP6.1 and reduced it by approx.by 50% to follow the line of the existing development boundary to the north and south of the preferred site and thereby represent more of a rounding off of the existing western settlement edge of Reydon village.

The LSDP submitted landscape impact assessment report’s conclusions are set out in section 4 of the Report. The Council’s assessment of sites 5/38 has been fundamentally disproved.

In terms of a sustainable location the land at sites 5/38 is just as conveniently accessible as is the preferred site in terms of its access via cycling and walking modes to local schools, services, shops and facilities in both Reydon and Southwold.

Para. 6.8 of the FDP infers that the allocation of the preferred land presents ‘a unique opportunity to secure land for the relocation of properties at risk from coastal erosion’. That opportunity of course is not unique as the delivery of land for 7 replacement houses can be achieved anywhere, including on sites 5/38.

Para 6.9 of the FDP Infers that the landscape impact of the proposed development of the site has not been considered in any detail which is in stark contrast to the landscape and visual assessment conducted for sites 5/38 by LSDP. The landscape strategy arising from the combined baseline evidence and assessments of Ecology, Landscape and Heritage from which flows the suggested Masterplan block layout for sites 5/38 within this submission illustrates the point that not only has impact been thoroughly considered in principle, but the results have been applied to the site specific requirements required to successfully integrate the development of sites
5/38 within the local landscape whilst simultaneously presenting significant opportunities for both enhancement to biodiversity and wildlife habitats and to public accessibility to quality open space.

Moreover, Sites 5/38 is capable of delivering a broad range of housing types, mix and density in accordance with section 6 of the National Planning Policy Framework (Delivering a wide choice of high quality homes) and also has the scope for delivering community facilities such as a Nursery (Use Class D1) (we note an existing shortage of preschool nursery places in the locality) as well as some food retail provision commensurate with the retail catchment area requirements of Reydon. For example, a Local food store of approximately 300m² of convenience retail floor space could be successfully accommodated within the site on the frontage to Green Lane.

Para 6.10 of the FDP notes the presence of a grade 2 listed building at Gorse Lodge within the vicinity of the allocation and simply indicates that any new development will need to respect the setting of it 'as much as is practical.' The duty of a Local Planning Authority in such circumstances and the weight to be attributed to the protection of heritage assets including their setting is well-known and is rehearsed in the NRL Heritage Impact assessment submitted within this representation. There is no sound reason why the assessment of the impact of development from the preferred site on Gorse lodge should be any less thoroughly executed and considered than is the case for sites 5/38 on a St. Margaret’s Church. Indeed, the preferred site’s impact on the same church should also be considered as we conclude that the development of the preferred site will have a greater impact than any arising from the development of sites 5/38.

At Para 6.12 of the FDP, we note that there is nothing either exceptional or unique about the essential requirement to provide appropriate infrastructure, including open-space and children's play areas as part of normal residential development of an appropriate scale. Just as it is required for the preferred site, so too can it be provided on sites 5/38 but our combined baseline assessments (landscape, ecology and heritage) which identify opportunities as well as constraints, provide for a positive well planned series of open spaces connecting with the adjacent development area and integrating with the wider countryside and built edge of the village, providing a successful transition between the two (see Master plan layout).

In summary conclusion, we invite the Council to reconsider its position with regard to the allocation of site WLP6.1 and to reconsider the merits of
allocating sites 5/38.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135242/PDF/-/8714901%201%20Green%20Lane%20Reydon.pdf

R A Palombo

Section 038 | Land at Green Lane, Reydon

Comment ID 47

Comment Perhaps it would be a more village friendly way of achieving the Council’s housing targets by smaller developments on other smaller sites through out Reydon.

The village should be enlarged by smaller developments north along Wangford Rd towards sites 5, 38 and 26 and historically the village of Reydon should spread along this road, if at all, as the village originated toward the church & church hall.

Attached documents
Taylor

Section 038 | Land at Green Lane, Reydon

Comment ID 104

Comment This site should not be included. All of the sites considered along Green Lane, this, site 26 and site 05, would extend the village with great negative impact north of the current boundary.

Attached documents
039 | Land at Grove Farm, Mettingham

Malcolm Tate

Section 039 | Land at Grove Farm, Mettingham

Comment ID 83

Comment Site 39 speaking to the Waveney D C representative at the Bungay Fisher Theatre, I raised the question as to why after it was originally thought that site 39 was ideal it was rejected,

I was told that the Broads Authority thought it would impact visually.

It is hard to understand how this decision was arrived at, as site 39 is located behind existing houses & would have been hard to be seen.

Attached documents
040 | Land at Laurel Farm, Hall Lane, Oulton

Badger Building (E.Anglia)Ltd Edward Gilder

Section 040 | Land at Laurel Farm, Hall Lane, Oulton

Comment ID 195

Comment We note that this land, site has not been allocated on the basis that development approved on adjacent land has not yet extended to its boundaries.

The land to the east remains undeveloped notwithstanding the allocation, at the whim of the land owner. That to the south being developed by Persimmon will be complete long before the plan period expires and will extend to the site boundary with the provision of the country park. We think it would be prudent to include the land at Laurel Farm at this stage and as a way of providing the necessary junction improvement between Hall Lane and Flixton Road. Hall Lane will inevitably carry more traffic once the Persimmon site is complete and with development proposed to the north of Hall Lane, that road will also carry additional traffic.

Development of the Laurel Farm site could also provide financial assistance with the provision of a necessary foul sewer on Hall Lane. It could be linked by phasing to the Hall Lane site so that its development did not take place before 2023. This would provide a backup site in the context of the five year land supply in the likely event that the sites adjacent Lake Lothing continue to remain undeveloped and would form a follow on from the Hall lane (north side) development, without the need for a subsequent plan amendment.

Attached documents
042 | Land at Market Lane, Blundeston

Blundeston & Flixton Parish Council Sarah Wells

Section 042 | Land at Market Lane, Blundeston

Comment ID 59

Comment The Parish Council are astounded that the land owner could even consider that this large piece of Grade 1 agricultural land, on the edge of the village, could ever be considered as suitable for housing development. At current acceptable densities this would represent a development of approximately 140 dwellings. Even without the development of the former prison site such a proposal, on this site, would be totally unacceptable to the Parish Council either now or at any time in the future. We therefore totally agree with your conclusions that any development here would have an adverse impact on the character of the village Development of this scale on this site would also seriously impact on the infrastructure particularly on the surrounding roads public transport and general facilities in the village. This site is rightly rejected now and should not be considered as suitable for housing development at any time in the future.

Attached documents
Isaac Francis

Section 042 | Land at Market Lane, Blundeston

Comment ID 70

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
Louise Duffer

Section 042 | Land at Market Lane, Blundeston

Comment ID 135

Comment
This site would definitely have a adverse impact on the village. The roads around this development are small, and already too busy. The drains/sewer system of the existing properties is not great and adding more pressure on the systems will cause further problems. The land is used for crops and there are other areas which are not being used as farm land which would be more suitable in the Waveney area. This site is not suitable at all for housing by removing the current character of the village.

Attached documents
Melanie Wright

Section 042 | Land at Market Lane, Blundeston

Comment ID 49

Comment

This is a piece of prime agricultural land which is currently farmed, with arable crops being grown on the land. The scale of the proposed development is totally out of keeping with development in other parts of the village, with the exception of the prison site which is very much a one-off development. The village does not have the infrastructure or amenities to cope with further large scale housing developments. Access to this site could be problematical with Market Lane being the only access point currently available. This road is already over-used and would need considerable upgrading if it were to cope with more traffic.

Attached documents
044 | Land at Sandpit Lane, Worlingham

Badger Building (E.Anglia)Ltd Edward Gilder

Section 044 | Land at Sandpit Lane, Worlingham

Comment ID 200

Comment We again put forward the merits of site 44 at Sandpit Lane, Worlingham (1.3 ha) which provides an ideal opportunity for either custom build or self-build development, which would otherwise be difficult to accommodate as part of a larger scheme. The site is in a sustainable location and is available for immediate development subject to the provision of any necessary infrastructure.

Attached documents
046 | Land at Swan Lane, Barnby

Badger Building (E.Anglia)Ltd Edward Gilder

Section 046 | Land at Swan Lane, Barnby

Comment ID 198

Comment From a landscape perspective we conclude that the village would be better served by developments in whole or in part, with associated infrastructure improvements on land at sites 46 and 48. Both are less visible on entry to the village and each provides the opportunity for much needed highway improvements.

Attached documents
Ben Blower

Section 046 | Land at Swan Lane, Barnby

Comment ID 53

Comment

This site should be considered for inclusion in this plan. The principal reason for it being excluded following the initial consultation was that it would have an adverse impact on Swan lane. I believe that this presents an opportunity to improve Swan Lane and therefore access to the properties served by it including the popular village pub as the development could incorporate some widening of the lane or the provision of passing places.

Other objections refer to:

1. detriment to open country - this is not true as it lies between existing houses and the main A146 which can hardly be described as open country.

2. poor drainage and flooding - this is predominantly light land with no history of flooding or drainage problems.

3. no local employment - there are better employment opportunities than most rural villages with the Beccles business park at Ellough to the west which is very close by (easy cycling distance) and the south Lowestoft industrial estate lies a little further to the east but only c 3 miles.

4. environment and wildlife - development here would have no impact on the Barnby Broad SSSI; there are already a number of houses between the site and the SSSI.

5. rural character & dynamics of the village & setting a precedent - we have to accommodate more people somewhere and this site presents an opportunity to locate new houses in an area that currently has no particular landscape value that will in fact have very little impact on the character of the village. It is not appropriate to assume that any development would consist of "executive dwellings" or that new residents would "have no connection with the village"
Attached documents
Jeroen van der Kooij

Section 046 | Land at Swan Lane, Barnby

Comment ID 159

Comment

This land is not suitable for housing for a number of reasons: the land is elevated and drainage is likely to adversely affect the surrounding land and properties. There is no infrastructure in place: single lane road can't support increased traffic, will be dangerous for pedestrians (no pavement available) including children wasking to local school, and horse riders. Building on that land will also likely cause issues with surface water. As this land isn't the periphery of the village it will negatively change the landscape.

Attached documents
Paul Lawrence

Section 046 | Land at Swan Lane, Barnby

Comment ID 636

Comment Regarding WLP7.2 (Barnby/North Cove)

Our preferred site would be No. 46, as this would avoid increased traffic through the village, and avoid congested parking issues at the local primary school.

These are serious concerns regarding the impact on A146 of increased traffic, and, in particular, access on the A146 from the village.

Attached documents
Sally Norfolk

Section 046 | Land at Swan Lane, Barnby

Comment ID 31

Comment If BARNBY needs more housing, then a few could go on proposed '46', subject to access but not a development of 45. This is a small village and would lose its identity and rural location feel if it had a large development.

Attached documents
048 | Land at The Green, Barnby

Badger Building (E.Anglia)Ltd Edward Gilder

Section 048 | Land at The Green, Barnby

Comment ID 199

Comment From a landscape perspective we conclude that the village would be better served by developments in whole or in part, with associated infrastructure improvements on land at sites 46 and 48. Both are less visible on entry to the village and each provides the opportunity for much needed highway improvements.

Attached documents
Jeroen van der Kooij

Section 048 | Land at The Green, Barnby

Comment ID 160

Comment

* In addition to the reasons provided above (risk of surface water flooding, reducing rural character, poor infrastructure) a further reason for this site not to be suitable for housing development is the ecological importance it has to several of Britain's protected bird species including barn owls and hobbies which are regularly spotted on the fields.

Attached documents
051 | Land at The Old Rectory, Church Lane, Oulton

Christopher Stannard

Section 051 | Land at The Old Rectory, Church Lane, Oulton

Comment ID 188

Comment

The summary to the First Draft Local plan states that this site is not considered suitable for allocation. The primary reason being that the report states that the site has a poor relationship with the existing built up area and that development would result in an unnatural extension to the existing development. I disagree with these statements. With the development of Woods Meadow the land at The Old Rectory will have built up areas to the South West, to the South, to the East and to the North East. With this in mind an extension of the built up area to Church Avenue rather than Church Lane produces a more natural boundary from both a geographical and topographical viewpoint.

Historic England states that the site is in close proximity to the Church of St Michael. Development within the site would not impact on the church as it is screened by mature trees, and is further away from the church than the 1970's housing on Church Lane which is in the direct site line of the church's entrance.

The Old Rectory is set in its own grounds, screened from all public roads and footpaths and is not exposed to the Broads. The development of this site would therefore have no effect on the local landscape from the public's viewpoint.

The owners have undertaken research concerning the development site and found nothing of historical value, it would appear to have been low grade grazing land for as far back as records could be found. The garden to the south of The Old Rectory (which is not part of the development site) was historically used for church fetes. A metallurgic survey was carried out on this land and nothing of significance was found.

This site is available immediately, deliverable and would lend itself very favourably to a low density self build or custom housing project. With is
good proximity to local transport links, enterprise areas, schools and shops
the development of this site would appear to satisfy many of the criteria of
The Government’s Draft White Paper “Fixing our broken housing market”.

Attached documents
053 | Land between Church Lane and Church Avenue, Oulton

Messrs Munnings and Jermy
MDPC Ltd (Malcolm Dixon)

Section 053 | Land between Church Lane and Church Avenue, Oulton

Comment ID 186

Comment

The merits of Site 53 are referred to as follows:-

The WDC Assessment states that

"(This site) has a poor relationship with the existing built up area".

Response

However, the site is adjacent to housing to the north and east (including the Woods Meadow development) and a school to the south, and thus has a good relationship with the existing built up area.

The WDC Assessment states that:

"The site has historic value",

In the Analysis of options for the New Waveney Local Plan Historic England stated that the site is in close proximity to the Church of St Michael, grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building although it may be screened by The Spinney.

Response

The site is approximate 300 metres away from the Church and there is a substantial established wooded area in between and the substantial Woods Meadow Site presently under construction is approximately only a further 100m to the north east; and therefore it is considered that given the distance and the topography there will be no material impact if this site is
developed on the Listed Church.

The WDC Assessment states that:

"The site is not considered preferable for allocation compared to other options available within and around Lowestoft".

Response

However, the site is in a more sustainable location than at least one of the preferred sites e.g. the proposed garden village (Site WLP 2.12) between Corton and Hopton which is within the defined Strategic Gap under the adopted Local Plan (Planning Policy DM28), the purpose of which is to protect open countryside and avoid the coalescence of the built up area Corton to the south & Hopton to the North; & conflicts with the proposed Planning Policy WLP 8.34 Coalescence of Settlements which includes reference to the relationship between Corton and Hopton.

Furthermore Site 53 is more sustainable being on the fringe of Lowestoft itself. It is likely that the Garden Village site will take several years to achieve a degree of sustainability and in the meantime any residents may be reliant on using most services in Lowestoft to the south or Gorleston /Great Yarmouth to the north. In the case of the former the town centre is 4 miles away whilst Gorleston High Street is 5 miles away and Great Yarmouth 5.5 miles; whilst Site 53 is less than 3 miles from Lowestoft Town Centre and as indicated below, has the benefit of a number of services even closer.

Within the statement submitted in support of Site 53 during the consultation exercise carried out between 22nd April & 17th June 2016 at para 3.0 the sustainability merits are indicated as follows:

"-----, the site is adjacent to existing and proposed housing and is within walking distance of a primary school, a shop and public transport facilities. Once the Woods Meadow site is established Site 53 will be reasonably close to additional retail facilities, a community hall, medical centre, second primary school, play areas and a country park; together with further public transport facilities. It is therefore in a very sustainable location. To suggest, as the LPA has done in its initial Sustainability Assessment, that a hedge on the western boundary of the Whiting estate to the east of the site forms a "natural edge" to the built form, does not take into account the existing housing stock and related development to the north, north west, south and south west, as well as the ongoing Woods Meadow development to the north east as referred to above, in the vicinity of this the site; -----

www.eastsuffolk.gov.uk/newwaveneylocalplan
However, it is acknowledged that the surroundings to the immediate west are semi-rural and therefore a lower density development as suggested by the LPA may be more appropriate."

By providing access with a T junction leading onto Church Lane to the north of Sands Lane, there is scope to introduce improvements to Church Lane including a new footway between Sands Lane and the new junction serving the site; and exploring the possibility of the provision a formal passing place to the north of the access. There is also scope to provide generous supplementary, replacement and new landscaping to all boundaries including along the Church Lane frontage.

In the light of the above and taking into account our proposed road improvements, tree screening to the west and appropriate development, we believe the site should be considered as a preferred residential site.

Finally in the Analysis of "Options for the new Waveney Local Plan" (July 2017), SC Archaeological Unit have indicated that the site may have some archaeological value and that if permission was to be granted then a condition should be imposed requiring a programme of Archaeological Evaluation is approved in advance. Messrs Jermy and Munnings would not object to this requirement.

Attached documents
056 | Land between Rushmere Road and Fairhead Loke, Carlton Colville

Keith Winter
Savills (Peter Start)

Section 056 | Land between Rushmere Road and Fairhead Loke, Carlton Colville

Comment ID 184

Comment

We refer to the above Consultation and our previous submission to your initial Call for Sites, details of which please find attached.

Our client owns the land immediately to the south of the Carlton Colville Primary School. One of the reasons they had tabled their land, as detailed in the earlier submission to you, was to raise the possibility of enabling development land as part of a possible release of other land for expansion of the Primary School grounds and on site car parking.

Whatever other development may in future take place in Carlton Colville presumably the existing Primary School will remain. As such, we believe it would be strongly preferable for parents to be able to safely deliver and collect their children using a car park on the same side of the road as the School.

We therefore ask you to consider this opportunity again as part of your future planning for this area. Our client owns other nearby land which you may feel would be better placed to provide scope for enabling development which we can clarify with you. We trust there will be an opportunity to discuss this proposal with you before you decide if it should be built onto the new Local Plan.

Attached documents
Russel Hubbard

Section 056 | Land between Rushmere Road and Fairhead Loke, Carlton Colville

Comment ID 88

Comment [In regards to the proposed 800 homes off The Street, Carlton Colville] The 3 smaller alternative options (no. 21, 56, 80 and 178), will be better options as the traffic will be dispersed on to several different roads

Attached documents
062 | Land east of Ellough Road, Worlingham

Worlingham Parish Council Lesley Beevor

Section 062 | Land east of Ellough Road, Worlingham

Comment ID 236

Comment

Alternative Sites

The Parish Council are disappointed that the current allocation, as well as other allocations, are clearly now being promoted as the District Councils preferred allocations despite a number of other suggested sites originally being promoted by the Parish and other third parties. Alternative sites have been relegated to Appendices of the Strategic Planning Consultation document which suggests the proposed options are something of a "fait accompli" and consideration will no longer be given to them.

Originally, one site preferred by the Parish Council is site 62 which would have the capacity to provide much of the required housing development over the next 20 years as well as helping to maintain the separate identity of the village.

The District Council suggest that development of site 62 would harm the setting of Worlingham Manor and may be affected by existing industrial premises. The impact on Worlingham Manor would be no more harmful than that caused by existing developments located on Garden Lane, Cedar Drive or even College Lane itself which are located a similar distance from Worlingham Manor. A suitable landscape buffer could be incorporated to further protect the existing setting. It is not the case that the impact of development on site 62 could not be satisfactorily mitigated as suggested by the Council.

Similarly, additional landscape buffers could be provided to separate new residential dwellings from the existing industrial estates or incorporate low impact office development to the eastern and southern boundaries of site 62 to further reduce impact.

The District Council also refer to the fact that using alternative sites to site WLP3.1 would involve several different landowners bringing with it the risk
of disagreement between landowners. The Parish Council would suggest that only very limited weight can be applied to this reason for not considering other alternative sites. The harm caused to the separate identities of Beccles and Worlingham must outweigh issues of land assembly which could potentially be solved via Compulsory Purchase Orders in any event.

As noted from the range of sites promoted within the southern part of Beccles, either side of London Road, there are a number of options over and above allocation WLP3.2 which would provide the required dwelling numbers for Beccles without the need to consider site 82. Noting the District Councils concern that these alternative sites would cause “exposed edges to the landscape” - surely the impact cannot be worse than that caused to the character and identity of Worlingham if site 82 were to proceed.

The Parish are also concerned at the suggestion that by having "dispersed sites" rather than a single large allocation this undermines the possible provision of a primary school and other infrastructure. There is no reason why having two or three separate allocations cannot all contribute to necessary infrastructure requirements through CIL or s 106 agreements. Once again this justification for site 82 does not outweigh the harm caused to loss of character.

Attached documents
063 | Land East of Flixton Road, Blundeston

Beverley Rose

Section 063 | Land East of Flixton Road, Blundeston

Comment ID 8

Comment I agree with the plan that this is not a good option for the village for the reasons already outlined in the plan and the prison site and loke proposals are better options for Blundeston village and the surrounding countryside.

Attached documents
Blundeston & Flixton Parish Council Sarah Wells

Section 063 | Land East of Flixton Road, Blundeston

Comment ID 60

Comment
With reference to our comments on site 42 above, the Parish Council are even more astounded that the land owner could even consider that another large piece of Grade 1 agricultural land, on the edge of the village, could ever be considered as suitable for housing development. At current acceptable densities, housing development on this site would represent a development of approximately 240 dwellings. The site is isolated from the heart of the village on its western edge and outside the village envelope. Development of this site would have a devastating impact on the character and size of the village. We very strongly agree with and support your conclusion that this proposed site is rightly considered as unsuitable now for inclusion in the local plan. Furthermore the Parish Council feel strongly that this site should not be considered as suitable for housing development at any time in the future.

Attached documents
072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Charles Fortt

Section 072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Comment ID 423

Comment In approving the development policies WLP3.1, WLP3.2 & WLP3.3, I also specifically support the exclusion of site 72 (land north of Lowestoft Road, Worlingham). Site 72 is unsuitable for development as it is an important area of wildlife habitat and militates against the coalescence of settlements, as described in policy WLP8.34.

Attached documents
Graham Jackson

Section 072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Comment ID 100

Comment Issues I consider particularly relevant in support of 'no-further new building development' in area 72 are as follows:

1. The feeder and connecting roads adjacent to area 72 (for example Grove Road and Old Farm Road) are already overcrowded with much on-road parking. This results in safety issues to all road users of the maze of access roads. Further extension of these roads would only make matters worse. Extending Old Farm Road southwards to connect directly to Lowestoft Road would create a rat-run with major safety issues, and therefore must not be supported.

2. The discounting of area 72 (policy WLP8.34) from future development plans not only maintains - correctly in my view - the integrity of the two communities of Beccles and Worlingham, but also maintains open areas close to central Beccles. A major additional advantage is that this policy enhances the wildlife potential of the area and will maintain those links between the surrounding rural areas and the open spaces within the town.

Attached documents
Paul Gennery

Section 072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Comment ID 81

Comment

I'm not too sure why this location would even be considered in the first place in honesty?

Please see below my reasonings for this absurd back-up choice.

* At per the attached / Hyperlink the flood probability for a certain segment of this area falls within the FLOOD ZONE 1 categorisation https://flood-map-for-planning.service.gov.uk/summary/642990/290097 especially as you have several dikes within this area.

* The wildlife within the area would certainly be affected. As mentioned within one of the reports; Historic England highlighted the potential impact on the Beccles Conservation Area and its setting.

* Finally & what's more alarming, why would anyone in this day & age even considered sport fields to build on? Beccles, unlike Lowestoft has no other football & likewise rugby pitches to participate sports upon.

Regards,

Paul Gennery

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/134059/PNG-/8670421%201%20Screen%20Shot%2020170908%20at%20134104.png.png

http://consult.waveney.gov.uk/gf2.ti/af/799778/134060/PNG-/8670421%201%20Screen%20Shot%2020170908%20at%20134134.png.png

http://consult.waveney.gov.uk/gf2.ti/af/799778/134061/PNG-/Screen_Shot_20170912_at_15.04.54.png
Rosemary Hewlett

Section 072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Comment ID 745

Comment If you were to go with Option 2, I have concerns about No. 72. I have already raised this issue when responding to the Larkfleet consultation. Part of this land belongs to the Beccles Fenland Charitable Trust and has not been put forward for development and would need a consultation with the public and the Charity Commission before any decisions could be made on that. Likewise, in the pullout that appeared in the Beccles and Bungay Journal in August, I see you state making improvements to the Quay. This land is currently in dispute of ownership and until that is sorted I do not see you can make any decisions regarding it.

Attached documents
Susan Doherty

Section 072 | Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Comment ID 140

Comment Site number 72 needs to be looked at again as part of this is Charity Land, something Beccles Town Council did explain to WDC. Have planners been notified of this?

Attached documents
075 | Land North of Snakes Lane, The Street, Lound

Somerleyton Estate Lord Somerleyton
Evolution Town Planning LLP (Steven Bainbridge)

Section 075 | Land North of Snakes Lane, The Street, Lound

Comment ID 155

Comment
Lound Strategy and Site Allocation Draft Policy WLP7.14

3.25 The draft local plan proposes to allocate a single site in Lound, covered by draft policy WLP7.14.

3.26 The Somerleyton Estate object to the strategy for Lound because of a number of inconsistencies in the site sustainability appraisals which have led to Site 75 not being allocated in preference to the draft allocation site.

3.27 At the call for sites stage the Somerleyton Estate submitted a site option in Lound referred to as Site 75 'Land North of Snakes Lane'.

3.28 Later on at the Issues and Options stage another site option 194 (now referred to as WLP7.14) was submitted by a third party and was assessed inconsistently with the sites options submitted for Lound at the earlier stage.

3.29 If these inconsistencies are corrected (as set out below) then Site 75 performs better than the WLP7.14 site and importantly on two of the most important SA objectives for rural villages; access to services and facilities and historic environment:

The table in Appendix 1 summarises the current site sustainability appraisal scores for both sites, explains the inconsistencies and suggests the corrected scores for Site 75 and WLP7.14 as shown in the summary table above.

3.31 As an example of one of the inconsistencies the Environment Agency mapping in Appendix 2 shows that no surface water flooding issues exist on Site 75 showing that the site assessment undertaken for Site 75 against
Objective 10 was wrong and should now be corrected.

3.32 The Somerleyton Estate request that the site sustainability appraisals are corrected and that as a minimum Site 75 is included as a proposed residential allocations alongside WLP7.14 or in place of it.

Attached documents  
076 | Land north of Sparrowhawk Road, Halesworth

Mrs S Orton

Comment ID 108

Comment

Having looked at your alternative options I would have liked you to consider the small sites as they would not impose so much on the town. Sparrowhawk road to the North of the town next to sites 76 13 and 102 should be considered as the road is hugely underused and currently provides good access to the town because of the roundabout by the Triple Plea and the prospect of employment at WLP4.5.

Attached documents
Mrs S Orton

Section 076 | Land north of Sparrowhawk Road, Halesworth

Comment ID 27

Comment It makes sense to use the smaller proposed sites. Sparrowhawk Road off sites 13, 76 and 102 would not interfere so much with other housing as it is a little used road and would have better access.

Attached documents
080 | Land off Church Lane, Carlton Colville

Badger Building (E. Anglia) Ltd Edward Gilder

Section 080 | Land off Church Lane, Carlton Colville

Comment ID 196

Comment We note that this land, site 80, has not been allocated although we further note in the analytical text of the site evaluation, that there is a discussion of the information and layout considerations necessary for any planning application. We find this a little confusing. The site is the subject of a current application by ourselves and for the reasons set out in that application and taking into account the comments made in the site analysis, we are of the view that the site can be developed without detriment to the landscape or the amenities of nearby properties and should be allocated in the plan. It does not require land assembly or master planning and provides an ideal opportunity to provide a continuity of land supply given the failure of the sites around Lake Lothing to deliver any housing within the predicted time scales.

Attached documents
Russel Hubbard

Section 080 | Land off Church Lane, Carlton Colville

Comment ID 89

Comment [In regards to the proposed 800 homes off The Street, Carlton Colville] The 3 smaller alternative options (no. 21, 56, 80 and 178), will be better options as the traffic will be dispersed on to several different roads

Attached documents
086 | Land off Saxons Way, Halesworth

Anonymous

Section 086 | Land off Saxons Way, Halesworth

Comment ID 16

Comment I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

Attached documents
Badger Building (E.Anglia)Ltd Edward Gilder

Section 086 | Land off Saxons Way, Halesworth

Comment ID 197

Comment We note the omission of site 86 from the allocations for this town. We remain of the view that this site, which could be developed in conjunction with the adjacent site 14, is conveniently located for easy access to the town centre, offers an opportunity for residential development without detriment to the surrounding area. It would be an ideal site for custom or self-build, but as a developer led scheme which could provide the access and facilitate serviced plots. The site is available for development either on its own or in conjunction with adjacent land and would complement any development which may take place on the opposite side of Saxon’s Way, where land has been allocated for housing for some years.

Attached documents
**Mr J Reeder, Ms G Catchpole and Mrs S Thompson**

Section 086 | Land off Saxons Way, Halesworth

Comment ID 139

Comment Site 86 - Land off Saxon’s Way.

Halesworth

Response to the views of the options for the new Waveney local plan.

Anglia water stated that surface water should be dealt with a sustainable drainage system. The developer would look at this in great detail and would ensure that this was put in place. Other housing is adjacent to this plot so should be able to link up with that sewage system, also there is an industrial estate between this plot and the sewage works, so linking up with that should not be a problem, again the developer would take all this into account.

Historic England cautioned that development on this site could have an impact upon the setting up of Gothic House (grade 11 listed) we disagree with this statement, having lived at Dairy Farm which joins Gothic House, views from the upper levels of these properties has been of the industrial estate - (if they are in the attic) so therefore a new development would ensure screening of these views could be landscaped more in keeping with the natural surroundings - i.e trees - natural fencing - hedging etc. Also if there is development on land behind, Gothic House and Dairy Farm which has already been proposed, why no objection then.

Suffolk County Council Archaeology noted that any development on this site would have an Amber impact - we cannot see that this would have any impact, as they have never had any interest in this site before. Houses were built on corner of this land and no objection or questions were asked then.

Halesworth Town Council have stated careful and original design of this unusual shape of land would be needed – the developer would ensure this.

Halesworth and Blyth Valley Partnership noted that this site was part of the proposed route for phase 2 of the Halesworth Relief road. Are they going to
pull down the houses on the corner of this site that have already been built? (approx 20 years ago) this making it impossible for any of this land to be proposed for a relief road. Also industrial site buildings would also have to come down.

Suffolk Wildlife trust stated that this site may contain species and habitats of ecological value, there would be no impact as this site is soon to be cleared of overgrown brambles etc.

The development of this land would have a significant positive effect rather than a negative effect as it would improve the area, be easily accessible to the town centre, school, bus and rail transport which would suit young people, also there are several older people who would prefer to be living closer to the town centre as they no longer drive or are as mobile as they used to be. Any development on this land would be done to enhance the area and developers would ensure all the requirements of local council and townsfolk are met.

Attached documents
087 | Land on Bungay Road, Holton, Halesworth, Suffolk

Mrs Mai and Mr Thomas Shiers

Section 087 | Land on Bungay Road, Holton, Halesworth, Suffolk

Comment ID 126

Comment We are unsure why the alternative site 087 Land on Bungay Road, Holton has been discounted as this site is as well located if not better located to shops, services and employment. Additionally this development site would have less impact on existing development and residential areas due to its location.

Attached documents
088 | Land on Hulver Road, Mutford

Wellington Construction Ltd Paul Pitcher
MDPC Ltd (Malcolm Dixon)

Section 088 | Land on Hulver Road, Mutford

Comment ID 137

Comment Reduced bid for Affordable Housing on frontage plus opportunity for self build and starter homes.

Attached documents
090 | Land on The Hill, Barnby

Wellington Construction Ltd Paul Pitcher
MDPC Ltd (Malcolm Dixon)

Section 090 | Land on The Hill, Barnby

Comment ID 138

Comment LPA Position - Consolidation between Barnby & North Cove

Response

WDC DC Committee Resolution to approve Housing at present on behalf of Wellington on part of this site

This layout could be modified to

* have access through gap (maintaining break on frontage between North Cove & Barnby - to include POS/Community Use and Flood Risk Alleviation measures –Attenuation Pond))

* provide development within southern part of site only, adjacent (and screened) Barnby By-Pass (see sketch Master Plan provided)

* To include Including self Build & starter Home provision as well as repositioned AH and general market housing (as already provided through present planning application supported by WDC)

Other Considerations

* Landscape impact acknowledged by WDC as being minimal

* Barnby PC have requested frontage parking to alleviate on street parking and this could also be provided

* In the WDC Analysis of the "Options for the new Waveney Local Plan" reference was made to possible Impact on Garden House Grade 2 Listed Building (Historic England)-this is 150 metres away from the site and there are a number of properties served from the Pightle and Fountains Way on the land in between (to the west of the site) and therefore there will be no
material impact on either the Listed Building or its setting.

LPA Position re Archaeology (Site 090)-likelihood low

Response

* Suffolk County Archaeological Unit comments re Application site (LPA ref 15/1439) with resolution to approve (WDC DC Committee 14/07/15)

* "The proposed development site is located close to a scatter or Roman pottery and metalwork. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposit that exists. There are no grounds to consider refusal in order to achieve preservation in-situ. Planning conditions are required to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. The standard two parts archaeological condition is recommended."

* The developers would be content to implement this strategy on the larger site

LPA Position re Site being Prone to Flooding

Response

* As referred to above flooding issue would be addressed by appropriate attenuation measures (see Sketch Master Plan)

General Overall Summary

* The bigger sites, Hammonds & Barnby offer opportunities to build swiftly in sustainable locations, and all 3 sites can help alleviate pressure on demand for general, affordable, starter and self build homes in the WDC area.

* In our opinion improvements to car fuel efficiency will broaden the case for sustainability considerably

Attached documents

091 | Land on the junction of St Olaves Road / Sluggs Lane, Herringfleet, Lowestoft

Anthony Cole

Section 091 | Land on the junction of St Olaves Road / Sluggs Lane, Herringfleet, Lowestoft

Comment ID 231

Comment Some development on the field at the corner of Slugs Lane and Herringfleet Road could be done as this would permit suitable roadworks and pedestrian/cycle access to the Green and School via the allotments.
094 | Land on the west side of London Road, Willingham

Sandra Broom

Section 094 | Land on the west side of London Road, Willingham

Comment ID 125

Comment I am very opposed to the proposed development of WLP7.20 and WLP7.19 and would much prefer the alternative site of 94.

Houses built on Mill Lane would be on the right side of the road to use village amenities and cars would enter the flow of traffic heading towards Beccles on the A145. Again pedestrians from Mill Lane would already have in place a large footpath on the correct side of the road for them to access school/public buses, village hall and pub. We would need a zebra crossing erected to cross the A145 to allow existing residents to access public amenities more safely and likewise persons wishing to use the playing field.

The construction of houses on Mill Lane would also see an even spread of housing across the village which would be more in keeping with the historic nature of the development of a rural village as opposed to trying to make one giant housing estate. This is not why we moved to such a rural area! If we wanted to live in a built up area we would have moved to one. Village life is wonderful and naturally houses have to be built but not all in such a small area. It would double the size Woodfield Close and Chartres Piece which are the only 2 roads with several houses on in the village! Spread them out! Furthermore Mill Lane has mostly bungalows with built up hedges so you would not be spoiling their view and have such a negative impact on their lives.

Also the impact on existing hedges, trees and natural habitats would be greatly reduced as building on the plots you have proposed would see massive destruction of beautiful natural habitats and wooded areas, along with country footpaths and trails, whereas Mill Lane is just farm land.
Attached documents
The Sotterley Estate support the Council's assessment of site submission no.94 (land on the west side of London Road, Willingham as unsuitable for allocation. The site, if developed, would lead to coalescence of the two settlements and would be exposed in the landscape. Site 94 is within 250m of two listed buildings and would be located in the same field parcel as shown below, seriously impacting on their settings:

102 | Land south of Sparrowhawk Road, Halesworth

Mrs S Orton

Section 102 | Land south of Sparrowhawk Road, Halesworth

Comment ID 110

Comment Having looked at your alternative options I would have liked you to consider the small sites as they would not impose so much on the town. Sparrowhawk road to the North of the town next to sites 76 13 and 102 should be considered as the road is hugely underused and currently provides good access to the town because of the roundabout by the Triple Plea and the prospect of employment at WLP4.5.

Attached documents
Mrs S Orton

Section 102 | Land south of Sparrowhawk Road, Halesworth

Comment ID 28

Comment It makes sense to use the smaller proposed sites. Sparrowhawk Road off sites 13, 76 and 102 would not interfere so much with other housing as it is a little used road and would have better access.

Attached documents
106 | Land to north of 34-48 Old Station Road, Halesworth

Anonymous

Section 106 | Land to north of 34-48 Old Station Road, Halesworth

Comment ID 17

Comment I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

Attached documents
107 | Land to the East of London Road, Beccles

Gillian Brett

Section 107 | Land to the East of London Road, Beccles

Comment ID 118

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 107 | Land to the East of London Road, Beccles

Comment ID 221

Comment Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
Michelle Golding

Section 107 | Land to the East of London Road, Beccles

Comment ID 111

Comment Possible sites would appear to be any of the pink (alternative sites considered) on the draft local plan, that are adjacent to the southern relief rd

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section 107 | Land to the East of London Road, Beccles

Comment ID 178

Comment The alternative sites proposed on the Western end of the Southern relief road, marked as sites 124, 107 and 36 are not considered suitable as the infrastructure and services are not available in this locality to support development. It has been commented that a distinct tract of land should separate the Beccles and Worlingham Garden Neighbourhood to maintain the rural aspects of both Ringsfield and Weston Parishes.

Attached documents
108 | Land to the east of London Road, Beccles (south of John Lawrence Close)

Susan Doherty

Section 108 | Land to the east of London Road, Beccles (south of John Lawrence Close)

Comment ID 207

Comment Plots 145, 43, 156, 24, and 108 surface water will no doubt be directed into the main storm drain which runs, from M and H plastics, under the railway line at Gosford Road, through to the lagoon at Morrisons and eventually to the river. Should this be the case, the heightening of this gully will be essential, as the last time this was done was during the 1960's. This is Anglian Water's responsibility.

Attached documents
111 | Land to the north of the A146, Beccles Road, Lowestoft

Durrants Nicholas Rudge

Section 111 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 152

Comment Carlton Colville town council states that the town must retain its semi-rural nature (pg 10 Analysis of Options Consultation). The development of sites 111 and 112 would not impede this as the land to the north of the proposed development is owned by Suffolk Wildlife Trust and is therefore unlikely to be developed. Furthermore the site is boarded to the East, South and West by roads which would define a clear boundary of where development stops.

Carlton Colville town council and the Broads Authority state that the physical limits (boundaries) around the town should be retained and no development should occur outside of these (pg 43 &230 Analysis of Options Consultation). While the development would occur outside of these the houses would not excessively extend them. Furthermore, there is currently development on the south west corner of site 112.

Carlton Colville town council and the Broads Authority stated their concern over the impacts development of the sites would have on the landscape and visual amenity of the area (pg 230 Analysis of Options Consultation). This impact could be minimised by devising a low level lousing scheme; bungalows and planting around the site close to already established hedges.

Site 111 is in fact not visible from the land to the north on the other side of the railway (as can be seen in photographs 1-3 attached). Site 112 is not visible from Carlton Marshes (as can be seen in photographs 4-6 attached). A map showing the location of where the photographs were taken can be seen attached). Furthermore, if the sites were to have bungalows on them there would be fewer units on the sites which would in theory minimise the extra recreational impact on Carlton Marshes, detailed by the Broads.
Authority as a concern (pg 230 Analysis of Options Consultation).

There would be a distinct separation between Carlton Marshes and the proposed sites by the railway and grassland to the north. The distance between the railway line and the marshes is between 312 and 367 metres.

Sites 111 and 112 are outside the Environment Agency flood zone for river and sea flooding. Both sites are easily accessible and access is possible to both sites off Ivy Lane and Burnt Hill Lane and directly on to the A146.

The sites are included as an alternative option being considered for inclusion on the local plan.

Carlton Colville it is proposed will receive a new primary school, new community centre and new sports facilities and these could be designed to accommodate the proposed developments (Future of our Towns, Villages & Countryside 1st Draft Local Plan - Story map).

Attachments:

Schedule of Photographs

Plan showing the locations the photographs were taken from

Attached documents
Graham Hunt

Section 111 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 77

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
<table>
<thead>
<tr>
<th>Section</th>
<th>Land to the north of the A146, Beccles Road, Lowestoft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>210</td>
</tr>
<tr>
<td>Comment</td>
<td>Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why are they building these properties on the River Waveney side of Beccles Rd. when the Council policy was &quot;no large developments on that side of Beccles Rd.? So why is there an &quot;ALTERNATIVE PLOTS shown on that side of Beccles Rd on the new draft map.</td>
</tr>
<tr>
<td>Attached documents</td>
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</tr>
</tbody>
</table>
### PJ UNDERDOWN

**Section**  
111 | Land to the north of the A146, Beccles Road, Lowestoft

**Comment ID**  
234

**Comment**  
Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why are they building these properties on the River Waveney side of Beccles Rd. when the Council policy was "no large developments on that side of Beccles Rd". So why is there an "ALTERNATIVE PLOTS shown on that side of Beccles Rd on the new draft map.

Thankyou Peter Underdown

**Attached documents**
112 | Land to the north of the A146, Beccles Road, Lowestoft

Durrants Nicholas Rudge

Section 112 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 153

Comment

Carlton Colville town council states that the town must retain its semi-rural nature (pg 10 Analysis of Options Consultation). The development of sites 111 and 112 would not impede this as the land to the north of the proposed development is owned by Suffolk Wildlife Trust and is therefore unlikely to be developed. Furthermore, the site is boarded to the East, South and West by roads which would define a clear boundary of where development stops.

Carlton Colville town council and the Broads Authority state that the physical limits (boundaries) around the town should be retained and no development should occur outside of these (pg 43 &230 Analysis of Options Consultation). While the development would occur outside of these, the houses would not excessively extend them. Furthermore, there is currently development on the south west corner of site 112.

Carlton Colville town council and the Broads Authority stated their concern over the impacts development of the sites would have on the landscape and visual amenity of the area (pg 230 Analysis of Options Consultation). This impact could be minimised by devising a low level lousing scheme; bungalows and planting around the site close to already established hedges.

Site 111 is in fact not visible from the land to the north on the other side of the railway (as can be seen in photographs 1-3 attached). Site 112 is not visible from Carlton Marshes (as can be seen in photographs 4-6 attached). A map showing the location of where the photographs were taken can be seen attached. Furthermore, if the sites were to have bungalows on them there would be fewer units on the sites which would in theory minimise the extra recreational impact on Carlton Marshes, detailed by the Broads.
Authority as a concern (pg 230 Analysis of Options Consultation).

There would be a distinct separation between Carlton Marshes and the proposed sites by the railway and grassland to the north. The distance between the railway line and the marshes is between 312 and 367 metres.

Sites 111 and 112 are outside the Environment Agency flood zone for river and sea flooding. Both sites are easily accessible and access is possible to both sites off Ivy Lane and Burnt Hill Lane and directly on to the A146.

The sites are included as an alternative option being considered for inclusion on the local plan.

Carlton Colville it is proposed will receive a new primary school, new community centre and new sports facilities and these could be designed to accommodate the proposed developments (Future of our Towns, Villages & Countryside 1st Draft Local Plan - Story map).

Attachments:

Schedule of Photographs

Plan showing the locations the photographs were taken from
Gisleham Parish Council Derek Ward

Section 112 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 176

Comment The use of the areas mentioned to the west of Carlton Colville would also have the advantage of commencing the much needed Barnby bends bypass from the roundabout at the end of Castleton Avenue. Areas 7 and 112 on the Beccles Road could be developed as preferred sites as links with the A146 would enable good transport infrastructure.

Attached documents
Graham Hunt

Section 112 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 76

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
PJ UNDERDOWN

Section 112 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 211

Comment Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why they are building these properties on the River Waveney side of Beccles Rd. when the Council policy was "no large developments on that side of Beccles Rd.? So why is there an "ALTERNATIVE PLOTS shown on that side of Beccles Rd on the new draft map.

Attached documents
Section 112 | Land to the north of the A146, Beccles Road, Lowestoft

Comment ID 233

Comment Several years ago, when Smiths Walk was built off Ivy Lane, I went to the Council Planning Office and asked why are they building these properties on the River Waveney side of Beccles Rd. when the Council policy was "no large developments on that side of Beccles Rd.? So why is there an "ALTERNATIVE PLOTS shown on that side of Beccles Rd. on the new draft map.

Thankyou Peter Underdown

Attached documents
114 | Land to the south of Church Lane, Corton

B Glennon

Section 114 | Land to the south of Church Lane, Corton

Comment ID 171

Comment
Also site 114. The RSPB does ringing of birds here.

Mr Bradley is signing this in agreement.

Attached documents
114 | Land to the south of Church Lane, Corton

Isaac Francis

Section 114 | Land to the south of Church Lane, Corton

Comment ID 519

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
Lyn Want

Section 114 | Land to the south of Church Lane, Corton

Comment ID 548

Comment Would you kindly indicate to me whose “preferred site for development” WLP2.12 can possibly be? Environmentally, it would be calamitous, and this is every bit as distressing as the disastrous effect this huge development would have on Corton village, whose very existence into the 21st century depends on support through managed growth. Only the alternative options, including site 114, offer hope for the residents of Corton on either score.

Attached documents
M J Edwards & Partners Chris Edwards
Strutt and Parker (Melissa Reynolds)

Section 114 | Land to the south of Church Lane, Corton

Comment ID 147

Comment
We write on behalf of our client, Christopher Edwards of M J Edwards & Partners, in relation to the Council's consultation on its First Draft Local Plan, which includes its preferred options sites for development. We have previously written in relation to our clients' land through the earlier 'Call for Sites' and 'Options for the New Waveney Local Plan' consultations (site ref. 114).

Appendix 5 - Alternative Sites

This includes our clients' site, ref. site 114, at Corton. It states:

'The site is located adjacent the existing built up area and relates well to the village, however, some landscaping and screening would benefit the scheme and lessen the impact on the open countryside and the church to the north. Within Corton there is access to community facilities including a primary school, shop and a community hall with a playing field and an equipped play space with the latter not in a condition or located close enough to serve the allocation. Footways provide access to these. However, the primary school does not have capacity to provide new places to support any development. For this reason the site is not considered suitable to be allocated for development in this Local Plan.'

It is therefore, accepted by the Council that the site could be suitable for development, if school spaces were available. Given the likelihood that a school would have to be delivered early on as part of the development of the North of Lowestoft Garden Community proposal, even if not possible to improve the existing school, it seems unreasonable to have ruled it out on this basis alone. Furthermore, it would be possible to provide open space on site to meet the needs arising from the development of this site, as per the Council's proposed policy, where paragraph 1.42 states:

'Housing sites of 1 hectare or more are generally large enough to provide
useable open space on site. The provision of new open space on site increases the opportunities and accessibility for play, physical activity and recreation which contributes significantly towards the health and well-being of the population.'

Draft Strategic Housing and Economic Land Availability Assessment July 2017

Pages 606-608 (Site Ref. 114), set out the assessment of our client's land. Interestingly, it summarises that it is suitable, available and achievable. Its assessment notes few potential issues that would need to be addressed, the three 'Ambers'. These would require mitigation to enable development to go ahead. The main issues being the foul sewer network and potential need for safety work to the highway. Neither of these are likely to be insurmountable and could be mitigated.

The Site

We reiterate previous submissions to consultation, which demonstrate the site is suitable, available, and achievable for development. These can be found enclosed with this letter.

Attached documents
115 | Land to the west of Halesworth (Block 1)

Andrew Barnes

Section 115 | Land to the west of Halesworth (Block 1)

Comment ID 23

Comment

Pleased to see that plots 115 & 116 (each side of Walpole Road) in Halesworth are NOT marked for development. Long may this remain the case because as previously rumoured remarks of possible 300-400 houses on these two fields would completely wreck this end of town. It would devalue properties in the Kennedy Close area, as well as destroying our views, cause flooding on the marshes below due to all the extra run-off, as well as all the other problems of so many people and cars. Please don't ever consider this field for development.

Attached documents
Anonymous

Section 115 | Land to the west of Halesworth (Block 1)

Comment ID 18

Comment I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

Attached documents
Charlotte Slater

Section 115 | Land to the west of Halesworth (Block 1)

Comment ID 101

Comment

The town map from the proposed new Waveney Local Plan shows possible alternative land for development, in Halesworth. I note on 2 of these sites the reasons for not building homes on this land is because it is: "in a prominent location and would have a greater negative effect upon the landscape than some alternative sites." I have to say site number 115 & 116 I feel are exactly the same as WLP4.2 - the land being proposed for homes off Chediston street. In fact, I would say that the land at the end of Chediston street is a site that would have a much greater negative impact on the surrounding landscape in comparison to site 115 & 116 because of his height difference compared to the homes surrounding it. I very strongly feel this and refute the reasons detailed for not building on plots 115 and 116, in the proposed New Waveney Local Plan. I also see no issue with the land on plots 115 & 116 being too far away from the town centre, as most residents on Dukes Drive and Bedingfield Crescent and nearby houses would walk, use their car or the local bus service to get into town, as do the residents of Holton. This is not an issue to prevent homes being built here, in my opinion.

Using alternative land to the proposed WLP4.2 site would reduce the significant detrimental impact on the residents surrounding the new development, mostly caused by the significant height difference of the land and subsequent overbearing visual presence / being overlooked by a large housing development to a large number of homes and families.

Attached documents
Kenneth Parry Brown

Section 115 | Land to the west of Halesworth (Block 1)

Comment ID 169

Comment
According to the Agricultural Land Classification map Eastern Region (ALC008) the land on Sites 115 and 116 is Grade 2.

As a matter of principle, development on this land should not be permitted.

Attached documents
Simon Weeks

Section 115 | Land to the west of Halesworth (Block 1)

Comment ID 21

Comment As a Walpole resident, I feel these proposals would close the green space between the two communities by too much.

Attached documents
115 | Land to the west of Halesworth (Block 1)

Andrew Barnes

Section 116 | Land to the west of Halesworth (Block 2)

Comment ID 24

Comment Pleased to see that plots 115 & 116 (each side of Walpole Road) in Halesworth are NOT marked for development. Long may this remain the case because as previously rumoured remarks of possible 300-400 houses on these two fields would completely wreck this end of town. It would devalue properties in the Kennedy Close area, as well as destroying our views, cause flooding on the marshes below due to all the extra run-off, as well as all the other problems of so many people and cars. Please don't ever consider this field for development.

Attached documents
**Anonymous**

**Section**

116 | Land to the west of Halesworth (Block 2)

**Comment ID**

19

**Comment**

I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

**Attached documents**
Charlotte Slater

Section 116 | Land to the west of Halesworth (Block 2)

Comment ID 102

Comment

The town map from the proposed new Waveney Local Plan shows possible alternative land for development, in Halesworth. I note on 2 of these sites the reasons for not building homes on this land is because it is: "in a prominent location and would have a greater negative effect upon the landscape than some alternative sites." I have to say site number 115 & 116 I feel are exactly the same as WLP4.2 -the land being proposed for homes off Chediston street. In fact, I would say that the land at the end of Chediston street is a site that would have a much greater negative impact on the surrounding landscape in comparison to site 115 & 116 because of his height difference compared to the homes surrounding it. I very strongly feel this and refute the reasons detailed for not building on plots 115 and 116, in the proposed New Waveney Local Plan. I also see no issue with the land on plots 115 & 116 being too far away from the town centre, as most residents on Dukes Drive and Bedingfield Crescent and nearby houses would walk, use their car or the local bus service to get into town, as do the residents of Holton. This is not an issue to prevent homes being built here, in my opinion.

Using alternative land to the proposed WLP4.2 site would reduce the significant detrimental impact on the residents surrounding the new development, mostly caused by the significant height difference of the land and subsequent overbearing visual presence / being overlooked by a large housing development to a large number of homes and families.

Attached documents
Joanna Barfield

**Section** 116 | Land to the west of Halesworth (Block 2)

**Comment ID** 29

**Comment** This area liable to flooding near the river. Beautiful valley full of wildlife – needs protecting!

**Attached documents**
Kenneth Parry Brown

Section 116 | Land to the west of Halesworth (Block 2)

Comment ID 170

Comment According to the Agricultural Land Classification map Eastern Region (ALC008) the land on Sites 115 and 116 is Grade 2.

As a matter of principle, development on this land should not be permitted.

Attached documents
Simon Weeks

Section 116 | Land to the west of Halesworth (Block 2)

Comment ID 22

Comment As a Walpole resident, I feel these proposals would close the green space between the two communities by too much.

Attached documents
117 | Land to the west of Laurel Farm Reydon, Reydon

Anne Cornwall

Section 117 | Land to the west of Laurel Farm Reydon, Reydon

Comment ID 41

Comment Other plots 117, 118 and 138 are all part of the AONB and should not be included in the plan.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section 117 | Land to the west of Laurel Farm Reydon, Reydon

Comment ID 202

Comment We consider that the current draft plan fails to allocate enough development to Southwold and Reydon at just 4% of the total (325 new homes). It is recognised that both Southwold and Reydon are constrained by environmental and landscape designations. However, we feel that Hopkins Homes' site at Halesworth Road, Reydon (see Location Plan at Appendix A) has been overlooked in this regard and we consider it to be a suitable and sustainable location for the development of approximately 100 dwellings. Land at Halesworth Road corresponds to the adjoining Sites 117 and 118 in the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA, July 2017).

Sites 117 and 118 comprise 19.8 and 2.95 hectares of land respectively and they are both identified as available and achievable for residential development by the SHELAA. They are, however, discounted as potential allocations on the basis that they would have an adverse impact on the Area of Outstanding Natural Beauty (AONB) and the setting of the Grade II Listed Gorse Lodge respectively.

The only site proposed to be allocated in Reydon (Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon) is located directly adjacent to Hopkins Homes' Site 117 and is located on the other side of Gorse Lodge from Site 118. Despite this, it is assessed as suitable for development due to it not encroaching "further in to the countryside to the west than what is already established by development to the north and south. Therefore, out of all the potential options for development in the Southwold and Reydon area, this site is likely to have the least impact". Policy WLP6.1 also states that the design of the development will need to respect the setting of Gorse Lodge as much as it is practical.

In the context of the above assessment, Hopkins Homes' land at Halesworth Road must be considered the next most sustainable option for

www.eastsuffolk.gov.uk/newwaveneylocalplan
development in the village. The site is a similar distance from Gorse Lodge and there is no reason to suggest that the development of the site could not be designed to respect the setting of this listed building. Furthermore, while the site does extend slightly further into the countryside than Policy WLP6.1, Halesworth Road forms the southern boundary of the site with Saint Felix School and residential (St Georges Square) uses on the opposite side of the road. The site's development would not therefore extend the western edge of Reydon into the countryside any further than is currently the case.

Hopkins Homes are a local house builder and in the past have completed four successful development in Reydon at Long Acre, Hillfields, Nightingale Place and St Georges Square (please see map showing the location of these developments at Appendix B). They understand the local context of the town and consider their site to be a uniquely sustainable option to deliver the additional housing requirements that we consider should be accommodated in the town.

We are also pleased to confirm that JMS Civil and Structural Consulting Engineers have reviewed the proposals and confirmed that a safe and suitable access for 100 dwellings can be provided (please see potential site access design at Appendix C).

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/135116/PDF/-/8713237%20APPENDIX%20A%20HALE
Pamela Morris

Section 117 | Land to the west of Laurel Farm Reydon, Reydon

Comment ID 40

Comment Surrounded by Grade Listed Building and busy main A1095 road.

Attached documents
**Sally Macnab**

**Section** 117 | Land to the west of Laurel Farm Reydon, Reydon

**Comment ID** 37

**Comment** Use of plot 138 will cause destruction of another part of the AONB. The permission to build on this and other plots such as 118 and 117 make a mockery of having AONB status, and having a plan of neighbourhood building consultations.

**Attached documents**
118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Anne Cornwall

Section 118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Comment ID 42

Comment Other plots 117, 118 and 138 are all part of the AONB and should not be included in the plan.

Attached documents
Anne Cornwall

Section 118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Comment ID 43

Comment Other plots 117, 118 and 138 are all part of the AONB and should not be included in the plan.

Attached documents
Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section 118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Comment ID 203

Comment

We consider that the current draft plan fails to allocate enough development to Southwold and Reydon at just 4% of the total (325 new homes). It is recognised that both Southwold and Reydon are constrained by environmental and landscape designations. However, we feel that Hopkins Homes’ site at Halesworth Road, Reydon (see Location Plan at Appendix A) has been overlooked in this regard and we consider it to be a suitable and sustainable location for the development of approximately 100 dwellings. Land at Halesworth Road corresponds to the adjoining Sites 117 and 118 in the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA, July 2017).

Sites 117 and 118 comprise 19.8 and 2.95 hectares of land respectively and they are both identified as available and achievable for residential development by the SHELAA. They are, however, discounted as potential allocations on the basis that they would have an adverse impact on the Area of Outstanding Natural Beauty (AONB) and the setting of the Grade II Listed Gorse Lodge respectively.

The only site proposed to be allocated in Reydon (Policy WLP6.1 - Land West of Copperwheat Avenue, Reydon) is located directly adjacent to Hopkins Homes’ Site 117 and is located on the other side of Gorse Lodge from Site 118. Despite this, it is assessed as suitable for development due to it not encroaching "further in to the countryside to the west than what is already established by development to the north and south. Therefore, out of all the potential options for development in the Southwold and Reydon area, this site is likely to have the least impact". Policy WLP6.1 also states that the design of the development will need to respect the setting of Gorse Lodge as much as is practical.

In the context of the above assessment, Hopkins Homes’ land at Halesworth Road must be considered the next most sustainable option for
development in the village. The site is a similar distance from Gorse Lodge and there is no reason to suggest that the development of the site could not be designed to respect the setting of this listed building. Furthermore, while the site does extend slightly further into the countryside than Policy WLP6.1, Halesworth Road forms the southern boundary of the site with Saint Felix School and residential (St Georges Square) uses on the opposite side of the road. The site's development would not therefore extend the western edge of Reydon into the countryside any further than is currently the case.

Hopkins Homes are a local house builder and in the past have completed four successful development in Reydon at Long Acre, Hillfields, Nightingale Place and St Georges Square (please see map showing the location of these developments at Appendix B). They understand the local context of the town and consider their site to be a uniquely sustainable option to deliver the additional housing requirements that we consider should be accommodated in the town.

We are also pleased to confirm that JMS Civil and Structural Consulting Engineers have reviewed the proposals and confirmed that a safe and suitable access for 100 dwellings can be provided (please see potential site access design at Appendix C).

Attached documents


Pamela Morris

Section 118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Comment ID 39

Comment Cultivated farmland.

Attached documents
Sally Macnab

Section 118 | Land to the west of Laurel Farm Reydon, Reydon (primary area)

Comment ID 36

Comment Use of plot 138 will cause destruction of another part of the AONB. The permission to build on this and other plots such as 118 and 117 make a mockery of having AONB status, and having a plan of neighbourhood building consultations.

Attached documents
122 | Land west of Norwich Road, north of Old Station Road, Halesworth

Hopkins Homes Christopher Smith
Armstrong Rigg Planning (Geoff Armstrong)

Section 122 | Land west of Norwich Road, north of Old Station Road, Halesworth

Comment ID 201

Comment

Hopkins Homes' site at Land West of Norwich Road (Site No. 122) comprises 4.92ha of land split into two adjacent parcels. The larger, eastern parcel extends to 3.37ha of cultivated arable farmland, whilst the western parcel, covering an area of approximately 1.55ha, is undeveloped grassland with overgrowth and scrub delineating the periphery. The site adjoins the settlement boundary of Halesworth on three sides to the north, east and south (see Location Plan at Appendix A and First Draft Plan settlement boundary map below) and to the west it is bordered by a railway line, beyond which is open countryside. To the north of the site is Broadway Drive Industrial Estate, to the east are properties fronting Norwich Road and to the south are properties fronting Old Station Road and an existing park and play area.

A Feasibility Sketch for the site has been produced (See Appendix B) which demonstrates its ability to accommodate the residential development proposed. Safe vehicular and pedestrian access into the site can be achieved from Norwich Road and a second pedestrian access would be provided through the existing public open space to the south of the site onto Old Station Road. The site is well related to the built-up area of the town and is just 900m walk from the town centre, 600m from Edgar Sewter Primary School and 250m walk from the proposed community, sports and education facilities at the Halesworth / Holton Healthy Neighbourhood (Policy WLP4.1)

The site is identified as suitable for residential development in the Strategic Housing and Employment Land Availability Assessment (SHELAA, July 2017) and Appendix 5 – Alternative Sites of the First Draft Plan makes it clear that
the only reason the site hasn't been proposed as a housing allocation is that the site is considered less favourable to the other preferred sites in Halesworth and Holton "which are either closer to the town centre, have more benign impacts or deliver wider benefits".

In the context of the additional housing requirement that will clearly need to be accommodated in Halesworth, we consider the site to be an eminently sensible and sustainable option to deliver new homes and request that it is allocated accordingly.

It is also unclear from the site assessments in the SHELAA why the site has not been allocated already above Policy WLP4.2 which is in a highly prominent landscape location to the southwest of the town. Both sites are assessed in the SHELAA as amber for Landscape / Townscape impact. This is despite the fact that Policy WLP4.2 extends some distance into the open countryside and is located on highly visible rising ground, whereas Land West of Norwich Road is enclosed on three sides by the urban area on a fourth side by a railway line. It should be clear therefore that the proposed site would have next to no landscape impact as it would essentially comprise infill development, whereas Policy WLP4.2 comprises an urban extension into a sensitive landscape environment. The two photos below show the most prominent views of each site from publicly accessible points within the urban area and clearly demonstrate the different landscape character of each site.

Site 122 is also located on the side of Halesworth that is the focus of recent planning consents and allocations and that is clearly considered to be the most sustainable direction for future growth. The SHELAA has also not taken into account the fact that Policy WLP4.2 is partly Grade 2 (i.e. Very Good) agricultural land that is in current agricultural use, whereas Site 122 is Grade 3 (i.e. Good to Moderate) agricultural land that is only partly in use. NPPF Paragraph 112 is clear in this regard that "Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality". It is clear therefore that Site 122 should be considered the more sustainable option for development above Policy WLP4.2.

Hopkins Homes are a local house builder and they recently achieved a resolution to grant planning permission (subject to finalising a S106 agreement) for 160 dwellings at Land North and East of Hill Farm, Halesworth (Ref: DC/16/5410/OUT & DC/16/5411/OUT). This resolution was passed on the basis that the Council needed a demonstrably
deliverable supply of housing sites for the new Local Plan. Hopkins Homes understand the local context of the town and consider their site to be a uniquely sustainable and deliverable option to provide the additional housing requirements that we consider should be accommodated in the town.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135101/PJP/-/8713141%20Figure%20First%20Draft%20Settlement%20Boundaries%20Map.jpg

http://consult.waveney.gov.uk/gf2.ti/af/799778/135102/PJP/-/8713141%20Figure%20View%20Towards%20Site
124 | London Road, Weston, Beccles

Derek Hammond

Section 124 | London Road, Weston, Beccles

Comment ID 54

Comment

I am responding in respect of the Waveney First Draft Local Plan. More specifically about the areas you have chosen to be favourite development sites to the south of Beccles. I think you have made a good decision to back the designated area of WLP3.1 north of the new Beccles Southern Relief Road now being constructed, this is the correct place for this new development, AS LONG AS you make sure the new amenities are built.g. new green spaces, new shops, definitely a new school and it has to have good access to the new relief road. The really big issue with this is healthcare. Currently the Beccles doctors have over 6000 patients each on their books, what happens when we build all the extra houses, to me this is the biggest issue, with an expanding and aging population how are we going to cope, especially when the infrastructure and facilities are not big enough today let alone in the next 10 years. The last big point I would make about the building of new houses, please note that these must be sold to LOCAL people, we have seen other areas that have had had influxes of "outsiders" from Northern England, for example, and how this has ruined rural Suffolk.

My other point is concerning areas 107 and 124 on the London Road which I note were considered and I understand have been discounted for housing. This is ABSOLUTELY THE RIGHT decision and is its 100% wholly inappropriate to think that we need houses on these green fields. Any such properties would be completely out on a limb and destroy farmland and wildlife.

Attached documents
Gillian Brett

Section 124 | London Road, Weston, Beccles

Comment ID 119

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 124 | London Road, Weston, Beccles

Comment ID 222

Comment Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211, and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
Michelle Golding

Section 124 | London Road, Weston, Beccles

Comment ID 112

Comment Possible sites would appear to be any of the pink (alternative sites considered) on the draft local plan, that are adjacent to the southern relief rd

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section 124 | London Road, Weston, Beccles

Comment ID 177

Comment The alternative sites proposed on the Western end of the Southern relief road, marked as sites 124, 107 and 36 are not considered suitable as the infrastructure and services are not available in this locality to support development. It has been commented that a distinct tract of land should separate the Beccles and Worlingham Garden Neighbourhood to maintain the rural aspects of both Ringsfield and Weston Parishes.

Attached documents
131 | Orchard Farm Rear Field, New Road, Barnby

John Egan

Section 131 | Orchard Farm Rear Field, New Road, Barnby

Comment ID 10

Comment

Reply to consultation in respect of Orchard Farm, New Road, Barnby NR34 7QH

Sirs, I wish to make the following comments regarding the above site. I would like you to reconsider his site for inclusion in the waveney plan.

Reasons.

1. The site is ideal for many reasons and is on a good bus route, very close to the main road into Beccles.

2. It's position is perfect especially bearing in mind that this plan is scheduled to last a long time and these houses will be needed. Barnby needs housing. It has an ageing population with very few opportunities for younger people to stay near family or move into the village, or for retired people to down size. It has lost its village shop, it's post office, the Methodist church and thus a social hall. With new blood this village will not prosper as it should.

3. It is not isolated at all. It has existing houses to the front and to the side and is within the village, all be it at the edge. This is actually an extremely good position for houses, ideal for mixed housing without extending the village boundary. It also is in a position which, whilst enhancing the village, at the same time, is not damaging to the existing abidance of the village.

4. Mains services, electricity, water and sewerage are all on site already.

5. The site is already well developed with four buildings already in addition to Orchard Farm Cottage itself so it is an ideal site for further development.

6. Three of the largest farm buildings on the site can be developed into housing under existing planning regulations without formal permission. Some further houses would not make any difference or have any adverse
effect.

7. Some restriction could be imposed on numbers. For instance, eight houses could be approved opposite the eight houses on New Road which would enhance the area. Partial inclusion of the site into the plan would actually be an excellent idea providing eight more important houses in an area which is already very highly developed. Please consider this option in a positive way. This reasons given for the early non inclusion in the plan do not apply at all to this relatively small strip of land in the build up part of New Road.

8. The farm itself has already been declared by the planning officer to be too small to be profitable as a farm so it is worthy of an alternative for this vital role.

9. The land is very poor quality, clay ground. I tried to plough the front field once and it was awful. It is very solid when dry and sticky when wet. I can prove this very easily by inspection. So it would be much better to use it for housing.

10. This site has extremely good access. If the eight houses option is included then the road is already in place and the project would be simple.

Conclusion.

If full inclusion is not too be acceptable in the plan then the option to include a small strip of land opposite the existing eight houses should be included to allow eight new homes in this already developed space. None of the reasons that have been put forward against the inclusion apply to this small area but with all the positive advantages of eight smaller houses for younger or poorer people. (this list is not exhaustive)

I humbly submit these observations for further consideration.

Attached documents
132 | Orchard Farm, New Road, Barnby

Jayne Evans

Section 132 | Orchard Farm, New Road, Barnby

Comment ID 638

Comment WLP7.2 Barnby and North Cove

My preferred site for the new development would be Site 132 New Road. My reason for choosing this site are as follows:

I believe it will connect the properties existing to Barnby and I think could ease the traffic situation on the A146 by allowing perhaps traffic lights or similar to be installed. Your reasons for refusing this site previously was it would be disconnected but I believe 45 properties would fit nicely on the site & ease congestion by the school.

New Road could only benefit as well as Barnby & could be well serviced by Public Transport.

Attached documents
John Egan

Section 132 | Orchard Farm, New Road, Barnby

Comment ID 11

Comment Reply to consultation in respect of Orchard Farm, New Road, Barnby NR34 7QH

Sirs, I wish to make the following comments regarding the above site. I would like you to reconsider his site for inclusion in the waveney plan.

Reasons.

1. The site is ideal for many reasons and is on a good bus route, very close to the main road into Beccles.

2. It’s position is perfect especially bearing in mind that this plan is scheduled to last a long time and these houses will be needed. Barnby needs housing. It has an ageing population with very few opportunities for younger people to stay near family or move into the village, or for retired people to down size. It has lost its village shop, it's post office, the Methodist church and thus a social hall. With new blood this village will not prosper as it should.

3. It is not isolated at all. It has existing houses to the front and to the side and is within the village, all be it at the edge. This is actually an extremely good position for houses, ideal for mixed housing without extending the village boundary. It also is in a position which, whilst enhancing the village, at the same time, is not damaging to the existing abidance of the village.

4. Mains services, electricity , water and sewerage are all on site already.

5. The site is already well developed with four buildings already in addition to Orchard Farm Cottage itself so it is an ideal site for further development.

6. Three of the largest farm buildings on the site can be developed into housing under existing planning regulations without formal permission. Some further houses would not make any difference or have any adverse effect.
7. Some restriction could be imposed on numbers. For instance, eight houses could be approved opposite the eight houses on New Road which would enhance the area. Partial inclusion of the site into the plan would actually be an excellent idea providing eight more important houses in an area which is already very highly developed. Please consider this option in a positive way. This reasons given for the early non inclusion in the plan do not apply at all to this relatively small strip of land in the build up part of New Road.

8. The farm itself has already been declared by the planning officer to be too small to be profitable as a farm so it is worthy of an alternative for this vital role.

9. The land is very poor quality, clay ground. I tried to plough the front field once and it was awful. It is very solid when dry and sticky when wet. I can prove this very easily by inspection. So it would be much better to use it for housing.

10. This site has extremely good access. If the eight houses option is included then the road is already in place and the project would be simple.

Conclusion.

If full inclusion is not too be acceptable in the plan then the option to include a small strip of land opposite the existing eight houses should be included to allow eight new homes in this already developed space. None of the reasons that have been put forward against the inclusion apply to this small area but with all the positive advantages of eight smaller houses for younger or poorer people. (this list is not exhaustive)

I humbly submit these observations for further consideration.

Attached documents
137 | Rear of Nos 485 & 487 London Road South, Lowestoft

Waveney Removers Roger Waveney

Section 137 | Rear of Nos 485 & 487 London Road South, Lowestoft

Comment ID 1

Comment Dear Robin, Rear 1.6 acres land analysis incorrect ask Fiona, no tree preservation orders have ever existed! Moreover I've felled trees already dangerous as WDC well know, by Norse. Moreover not in conservation area! But behind demarcation lines. Please amend printed comments as not true and reprint adjustments. Thanks Robin

Yrs Roger Wicking, Waveney Removers CEO.

Attached documents
138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Anne Cornwall

**Section**

138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

**Comment ID**

44

**Comment**

Other plots 117, 118 and 138 are all part of the AONB and should not be included in the plan.

**Attached documents**
Anonymous

Section 138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Comment ID 45

Comment I feel very strongly that this is a bad plan for the area.

1) The local plan for the area has been totally ignored. Why?

2) The school playing field should not just built on to provide money for a failing business.

3) The approach to the Halesworth Road as planned, is an accident waiting to happen as there a deep dip in the road there.

4) The trees and area are AONB – this seems to have been ignored.

Plus CS01, DM01, CS11, CS15, DM22, DM25, DM26, DM27.

There is no reason for this plan should be allowed to go forward. But though the planning evening your arranged was excellent.

Attached documents
Pamela Morris

Section 138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Comment ID 38

Comment Playing fields AONB.

Attached documents
Sally Anfilogoff

Section 138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Comment ID 134

Comment Appendix 5 Alternative Sites

"Site 138 Saint Felix School

This site is not suitable for development due to the loss of playing field provision."

That’s good to know but somewhat disingenuous as the Planning Committee of 11 July 2017 gave outline permission subject to s106. Does your left hand not know what your right hand is doing? I fear that other sites may also suffer from this blinkered approach to planning.

Attached documents
Sally Macnab

Section 138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Comment ID 35

Comment Use of plot 138 will cause destruction of another part of the AONB. The permission to build on this and other plots such as 118 and 117 make a mockery of having AONB status, and having a plan of neighbourhood building consultations.

Attached documents
St Felix School -
Bidwells (Simon Henry)

Section 138 | Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Comment ID 191

Comment
It has been noted that in the Draft Strategic Housing and Economic Land Availability Assessment, St Felix School (Site Reference 138) scores well in availability and achievability criteria but has been discounted on the basis that no replacement Sports Pitch has been identified / provided. The planning application (Ref. DC/15/3288/OUT) and supporting Section 106 Heads of Terms demonstrates that a deliverable replacement Sports Pitch has been identified and will be delivered as required of the S106. The Waveney Planning Committee at its meeting on 11 July 2017 resolved to permit the planning application, subject to completion of the Section 106 agreement. The Committee resolved that the draft S106 is considered at a future Planning Committee before completion.

The planning situation, has therefore changed, and it is now clear that not only is a replacement sports pitch been identified (on the School’s equestrian area), but that its delivery is able to be secured through the S106. Therefore, the New Local Plan needs to acknowledge this and be updated to reflect the situation. The Site, given that it scores well against the testing criteria and Sustainability Appraisal for the replacement pitch, has been identified and can be secured and should now be formally identified as an allocation for up to 69 houses in the Local Plan.

Attached documents
The reason given for rejecting the site is stated as "The site is not located within or adjacent to a ... smaller village in the rural area". This statement is incorrect as the Northern side of the site adjoins a group of old people's bungalows, the Village Hall and a row of Social Housing and on the opposite side of the road there is further housing. The site therefore forms part of the residential area of the village.

When the initial submission was made it was simply to propose this as a suitable site for building and subsequent proposals would have been for a limited number of properties to be built over a period of time with their number and size being related to the future needs of the village and surrounding area. Such housing would potentially include a mix of private and social properties, including low cost starter homes, which are very difficult to find in the rural villages. Clearly, future developments in the greater surrounding area would be in the main centres of Halesworth, Harleston and Bungay, but there will also be a desire from some people working in these centres to reside in rural villages, such as St James, and therefore expansion in villages will be necessary. Somehow, during the submission process the Planning Department inserted a suggestion of 33 houses on the site. This was clearly a ridiculous suggestion for a small village and may have influenced the decision not to recommend development on this site.

We therefore believe that this decision should be reversed.

Attached documents  
[http://consult.waveney.gov.uk/gf2.ti/af/799778/134537/DOCX-/8674101%201%20Site%20143docx.docx](http://consult.waveney.gov.uk/gf2.ti/af/799778/134537/DOCX-/8674101%201%20Site%20143docx.docx)
145 | The Bull Field, Ringsfield Road, Beccles

Geoffrey Nobbs

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 51

Comment I am against any development of the Bull Field Ringsfield Road Beccles (Site 145) because:

* It can only have exits on either Meadow Green or Ringsfield Road. In the case of the Ringsfield Road exit it would come out near a "S" bend adjacent to the Leman School Playing Field and any traffic going North i.e. towards Beccles would have to pass the Sir John Leman School and also St Benedict's Academy before coming to the junction with St Mary's Road. In both schools cases there are a significant number of vehicle movements associated with them including in the case of the Leman School a considerable number of school buses which have to park on Ringsfield Road itself thus reducing it to a one lane road at times. If traffic exits from the site onto Ringsfield Road and then turns into South Road it will be faced with a narrow stretch of road as it passes the Beccles Cemetery before joining London Road. This road by the cemetery only has a narrow footpath on one side for the length of the road to its junction with London Road. This footpath is heavily used by pupils walking to and from the Leman School as well as pupils cycling to and from the School. The comment re the exit roads also apply to traffic exiting from Meadow Green.

* The "S" bend near the School Playing Field has also had drainage problems with surface water being a regular feature during the last few years. Development of the site may well have increase this problem with the run off from roads serving the site.

* The Field itself has somewhat unusually some mature trees dating back to its former use which are valuable for wildlife on the edge of the Town.

Attached documents
Jane Leather

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 216

Comment

We support the decision to discount each of the sites along Ringsfield Road (marked on the Waveney First Draft Local Plan as Nos. 24, 174 and 145). They are unworthy of further consideration due to the valid reasons that have been put forward by Beccles for all three to be discounted and agree that the preferred sites for development are significantly more suitable.

In the evaluation process it has already been identified that Ringsfield Road would be a totally unsuitable access route for the Alternative Site proposal. The part of Ringsfield Road to the Western boundary of the Alternative Sites connects bridleways from Primrose Lane to Cut Throat Lane (Hangman’s Lane) and is regularly used by horse riders, cyclists and walkers. This is a narrow road with a sharp bend and hedges and there is consequently poor vision. A significant increase in volume of traffic would make it even more congested and hazardous for horse riders, cyclists, walkers and motorists.

The Alternative site in question includes Grade II Agricultural Land and it would seem irrational to build on productive agricultural land and lose it to housing for the future. Development of this Alternative site would also bring a significant impact on the rural landscape, long established hedges and wildlife.

Attached documents
John Hill

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 219

Comment

The Waveney Local Plan identifies some alternative sites along Ringsfield Road for industrial and housing development. These are sites 24, 174 and 145. We support the council's decision to discount these sites, for the considered reasons already given and would like to offer some additional validation for rejecting these sites.

The western boundary of these sites, Ringsfield Road, is a narrow road with two 90 degree bends which have poor visibility. We have witnessed a number of near miss collisions at these bends. This section of Ringsfield Road is used frequently by horse riders, dog walkers and cyclists. There would be a significant increase in traffic volume, should these sites be developed, with a far greater probability of traffic accidents.

These sites include valuable Grade II Agricultural land and hedgerows, which provide a natural habitat for a variety of wildlife. These would all be lost were these alternative sites to be developed and the Western approach to Beccles would lose its rural landscape.

Attached documents
Ringsfield and Weston Parish Council Jean Brown

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 180

Comment The alternative option sites identified to the West of Beccles, numbered 145, 174 and particularly 24 are not considered suitable sites as they are not supported by the relevant services, current infrastructure and can be viewed as prime agricultural land. Again there is a desire to have a clear land boundary between Beccles and Ringsfield to avoid the sense of Ringsfield becoming a satellite of Beccles or being 'swallowed' by the town.

Attached documents
Robin Howell

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 143

Comment

The Waveney Local Plan has identified parcels of land that are potentially suitable for development to fulfill the future needs for housing and employment across the District. Preferred and alternative sites have been considered in Beccles including sites along Ringsfield Road identified as 24, 174 and 145 on the Draft Local Plan document. I support the decisions that each of these sites has been discounted for a number of considered, appropriate and valid reasons and would like to add some additional considerations to further validate the decisions.

These sites include Grade II agricultural land, long established hedgerows and mature trees in a small field setting. The loss of habitat and the impact on the rural landscape would be significant should this land be developed. It might also be considered that with the uncertainty of the outcome of Brexit negotiations and the possible impacts on agricultural policy and food production in the UK it would indeed be shortsighted to permanently lose highly productive agricultural land to housing.

It has been correctly identified during the evaluation process that Ringsfield Road is not a suitable access route for these sites. The road passes John Leman School, already a bottleneck during school opening and closing times and also on Saturday mornings during sports practice on the playing fields opposite the school. Additional traffic on this route would lead to more congestion and increased exhaust emissions past the school and playing fields. Exhaust emissions and the effects on air quality particularly near schools is a matter of concern for health professionals and authorities.

The section of Ringsfield Road delineating the western boundary of the Alternative Sites forms the connection between bridleways at Primrose Lane and Hangman’s Lane and is in frequent and regular use by horse riders and dog walkers. This narrow country road with hedges lining the verge can already be somewhat hazardous at existing traffic volumes. Any further increase in traffic along Ringsfield Road will only augment the hazard to
walkers and horse riders.

Part of the National Cycle Route follows Ringsfield Road proceeding from Beccles past these sites and continues on through Ringsfield Village and along School Road. Cycling is fast growing in popularity in the UK and is being encouraged for health and environmental reasons. Increased traffic density on a frequently used section of this designated National Cycle Route would compromise these aims.

The existence of better served more suitable sites to meet the needs of Beccles development should enable Waveney to choose those preferred sites and preserve green field countryside for future generations.

Attached documents
Rosemary Shaw

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 156

Comment I welcome the discounting of site 145 for the reasons specified. Vehicular access could only be obtained via Ringsfield Road rather than London Road - and would thus not connect with the Beccles Southern Relief Road, increasing traffic flowing contrary to the direction envisaged by the relief road. It is part of National Cycle Route number 1 and is prime agricultural land.

Attached documents
Susan Doherty

Section 145 | The Bull Field, Ringsfield Road, Beccles

Comment ID 1502

Comment Plots 145, 43, 156, 24, and 108 surface water will no doubt be directed into the main storm drain which runs, from M and H plastics, under the railway line at Gosford Road, through to the lagoon at Morrisons and eventually to the river. Should this be the case, the heightening of this gully will be essential, as the last time this was done was during the 1960's. This is Anglian Water's responsibility.

Attached documents
147 | The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Graham Hunt

Section 147 | The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Comment ID 72

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
Section 147 | The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Comment ID 150

Comment

Lowestoft, The Old Rifle Range (Site 147)

On behalf of Martin and Lawrence Tegerdine, we wish to challenge the Council's proposed approach to the distribution of growth across the District, and consider that Site 147 (Rifle Range) should be identified as a preferred site for residential development.

The proposed strategy sees approximately 55% of growth located within the District’s Main Town, Lowestoft, with the remaining 45% distributed across the Market Towns, villages and rural areas. Approximately 12%, which equates to a minimum of 963 homes, is located within the rural areas. Whilst it is appreciated that there is a need to sustain the rural villages, and a degree of new development is needed to ensure that the rural area does not suffer further decline in terms of services and facilities, it is considered that the scale of growth proposed in these areas is disproportionate. To propose this quantum of new development in the rural areas, when there are suitable sites, such as Site 147, available within Lowestoft, the most sustainable location in the District, is not a sound approach.

We have previously demonstrated, through the Call for Sites and subsequent correspondence with the Council's Planning Policy Team, including preparation of a Report on Deliverability (appended to this Representation), that the Rifle Range site is deliverable in terms of the NPPF definition; it represents a suitable location for development, is available immediately and would be viable. The reasons given for discounting the site as a residential allocation are weak and unsubstantiated; the site does have a good relationship with existing residential areas, and indeed borders a row of cottages known as Catherine Terrace, Elizabeth Terrace and Barnard's Terrace. It has been demonstrated, through the preparation of a Masterplan previously presented to the Council, that the site could be
developed in such a way as to ensure that there is minimal loss of undeveloped coastline, with provision of an extensive area of open space in the southern and eastern parts of the site.

Whilst it is acknowledged that there are capacity issues at Pakefield Primary School, the Council's current proposals include a large residential allocation at Carlton Colville which would also deliver a primary school (Site Allocation WLP2.15). Development at Site 147 could benefit from the use of this facility, and make a significant financial contribution towards its delivery. This would, in turn, reduce the pressure on Site WLP2.15, and improve its viability.

The site is not in productive agricultural use, and its historic use as a rifle range and military base means that it unlikely to ever be returned to this use. Development of Site 147 would not, therefore, result in the loss of productive Grade 1 Agricultural Land. The majority of land to the south of Lowestoft is Grade 1, and development of Site 147 therefore presents a unique opportunity to expand the town in a southerly direction without losing the best quality and most versatile agricultural land.

In light of the above, it is considered that the strategy for growth across the District should be reconsidered, with more residential development directed to the most sustainable location – Lowestoft. The allocation of Site 147 for development of approximately 200-250 dwellings would represent a highly sustainable approach, in full accordance with the NPPF.

**Attached documents**

http://consult.waveney.gov.uk/gf2.ti/af/799778/134832/PDF-/8692309%201%20Email%20addendum%20Report%20on%20Deliverabil

148 | The Sawmill, Sandy Lane, Holton, Halesworth, Suffolk

Jeffrey Geering
Ingleton Wood LLP (Sarah Hornbrook)

Section 148 | The Sawmill, Sandy Lane, Holton, Halesworth, Suffolk

Comment ID 149

Comment Holton, The Sawmill, Sandy Lane (Site 148)

On behalf of Mr J Geering, we wish to object to the preferred sites identified within Holton and Halesworth, and consider that site 148 is more suitable for development. We have previously demonstrated through the Call for Sites process that the site is, in accordance with the National Planning Policy Framework (NPPF), a suitable location for development, is available immediately and is viable (a copy of the Call for Sites Representation is attached).

The proposed strategy set out in the First Draft Local Plan focusses the majority of development onto two large sites on the edge of Halesworth (WLP4.1 and WLP4.2), with a further two small preferred sites, one in Halesworth (WLP4.3) and one on Lodge Road, Holton (WLP4.4).

We consider that site 148 (The Sawmill) is more suitable than the preferred site in Holton (land west of Lodge Road – WLP4.4). The Sawmill constitutes previously developed land, having been used as a sawmill for some 200 years, and benefitting from an existing consent for storage and distribution with ancillary retail use, whereas WLP4.4 is a greenfield site and Grade 3 Agricultural Land. Whilst the Council have noted that the Sawmill site’s former employment use may have resulted in ground contamination, this is not unusual for previously developed land and it is not anticipated that the level or nature of contamination would be unusual. A Phase 1 Contaminated Land Assessment has been completed by Canham Consulting, and is attached to this Representation, which concludes that whilst further intrusive investigations are required to fully understand the level of any potential contamination, this could be controlled by a planning
condition on any future planning permission, and the site could be suitably remediated to ensure it is safe for residential use. Residential development would represent a meaningful alternative use for this former employment land, which would be of wider benefit to the village, rather than allowing it to become derelict. Development of the Sawmill would be preferable to the release of greenfield land on the edge of the village and would be more in line with the NPPF, which seeks to ensure that previously developed land is brought forward in preference to greenfield sites.

The Council's assessment of the site concludes that the Sawmill is enclosed in the landscape, and that development in this location would have a minimal impact upon the landscape. This is in contrast to site WLP4.4, which is much more open in landscape terms and will require more mitigation to reduce landscape impacts.

Whilst it is acknowledged that Sandy Lane is narrow and highway access is constrained, the extant use of the site is capable of generating significant levels of traffic, including HGVs, and replacement of this use with residential development is likely to be beneficial in highway safety terms.

The Sawmill site is located in the centre of the village, very close to the primary school and the public house, whereas site WLP4.4 is more peripheral and further from the key services.

In addition, we consider that allocating smaller sites, such as the Sawmill site, is preferable to relying on large scale allocations to deliver the growth of Halesworth and Holton. Smaller sites are more likely to be brought forward in a timely manner, helping meet local housing need. Moreover, modest development within Holton will help to sustain the existing services and facilities, whereas focusing development almost solely in Halesworth will further the decline of services within Holton, and increase reliance on Halesworth to meet residents' daily needs.

Furthermore, preferred site WLP4.1, the Halesworth/Holton Healthy Neighbourhood, is located in the Strategic Gap between the two settlements and development of the scale proposed (215 dwellings) in this location will accelerate the coalescence of Holton and Halesworth. The Vision for the District, set out at the beginning of the Draft Local Plan, emphasises the need for Holton and Halesworth to retain their separate identities and to protect the sensitive landscape surrounding them. The residential part of this proposed allocation, formerly Site 152, was previously assessed by the council in their Initial Sustainability Appraisal of Emerging Options, Spring 2016, which states, "It forms a major incursion
into the gap between Halesworth and Holton and would harm views towards Holton in the east”. Furthermore, the site is a greenfield site and comprises Grade 3 Agricultural Land.

Conclusion

The Council’s preferred approach to accommodating growth in Halesworth and Holton should be reconsidered; the Sawmill site has previously been demonstrated to represent a deliverable site in terms of the NPPF definition and represents the most appropriate location for new residential development in Holton, as it constitutes previously developed land. It should be allocated in preference to site WLP4.4, or alternatively in addition to site WLP4.4 to enable a reduction in the scale of development proposed in the Strategic Gap between Halesworth and Holton. To focus development on greenfield land, particularly that which forms a specific function in preventing coalescence of two settlements, should not be considered in preference to a suitable, available and viable previously developed site.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/134828/PDF-/8691989%201%20Waveney%20Local%20Plan%20Call%20for%20Sites%20Form%20April%202016pdf.pdf

http://consult.waveney.gov.uk/gf2.ti/af/799778/134829/PDF-/8691989%201%20210042P1%20Phase%201%20Land%20Cont
Section 150 | The Street, St James South Elmham

Comment ID 98

Comment

The reason given for rejecting the site is stated as "The site is not located within or adjacent to a ... smaller village in the rural area". This statement is incorrect as the Eastern side of the site adjoins a group of old people's bungalows, the Village Hall and a row of Social Housing. To the Western edge there is a commercial operation and on the opposite side of the road there is continuous housing. In the majority of rural villages there would usually be housing on both sides of the main road through the village, but unusually in St James the housing is primarily on the Northern side of the road. In-fill building on this site would therefore "normalise" the lay-out of the village's housing.

When the initial submission was made it was simply to propose this as a suitable site for building and subsequent proposals would have been for a limited number of properties to be built over a period of time with their number, size and type being related to the future needs of the village and surrounding area. Clearly, future developments in the greater surrounding area would be in the main centres of Halesworth, Harleston and Bungay, but there will also be a desire from some people working in these centres to reside in rural villages, such as St James, and therefore expansion in villages will be necessary. Somehow, during the submission process the Planning Department inserted a suggestion of 91 houses, plus a care home on the site. This was clearly a ridiculous suggestion for a small village and may have influenced the decision not to recommend development on this site.

We therefore believe that this decision should be reversed.

157 | West of Redisham Road, Brampton

Glynn Buck

Section 157 | West of Redisham Road, Brampton

Comment ID 65

Comment

As the owner of site 157 I would like to resubmit it on a much smaller scale of 0.6 of a hectare with a road frontage of 150 metres and a depth of 40 metres with as much of the original hedge being retained as possible. I have lived in the village of Redisham for over 30 years and during that time have seen the number of school children go from 12 to 4 at present as we now have a population of about 125 who are mainly over 60 including myself. The site is 300 metres from the centre of Redisham and 480 metres to Brampton railway station which has 33 trains stopping at Brampton from 6am until 11pm with Abellio the operator now investing £1.5billion on all brand new trains and station upgrades with through trains to London from 2019. Anglian Bus also pass the site 8 times per day on the Beccles to Halesworth route. The site also has an 8" water main running along its frontage and an overhead electricity supply of 11,000 volts. The C940 road that fronts the site only has moderate traffic flows and is very quiet during the day with a central location between Beccles, Bungay and Halesworth. We have three schools nearby at Brampton St Lawrence and Ringsfield.

Local shopping can be had at Tony's Stores Westhall which is being run by his very loyal staff and threatened by the home delivery grocery vans which seem to be everywhere now.

I have never had trouble finding employment whether local or further afield and at present at Clays Bungay who have staff shortages. The new Beccles Southern Relief Road will also help access to Ellough Industrial Estate and Lowestoft.

I think that this development if granted will breath new life into the village of Redisham.

(map enclosed)
Attached documents
Roy Harris

Section 157 | West of Redisham Road, Brampton

Comment ID 32

Comment There are more viable options to place housing in the area [Brampton]. Plot 159 (note: should read 157) is on a straight section of road. There are no houses in front or behind and the sewage works is close by at the corner of Redisham Road.

Attached documents
160 | Basley Ground, Bramfield Road, Halesworth

Anonymous

Section 160 | Basley Ground, Bramfield Road, Halesworth

Comment ID 20

Comment I feel other smaller 'pockets' of development i.e. 115 + 116, 160, 86, 14, 106 might be a much better proposal due mostly to the height issue of WLP4.2 land.

Attached documents
164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Anne & Stewart Wrigley

Section

164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID

164

Comment

You set out what you want to achieve in your First Draft Local Plan

improve quality of life

improve the health of the population

protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.
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<th>B Glennon</th>
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<td><strong>Comment ID</strong></td>
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</table>
| **Comment** | Site 179 seems more suited as is site 164. Also I believe that site WLP2.12 was turned down, 6yrs or so ago as a golf course as it would be detrimental to the wildlife and environment.  
Mr Bradley is signing this in agreement. |
| Attached documents |
Beccy Francis

Section 164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID 85

Comment On a more constructive note, there is a grey shaded area on your plan to the south of the WLP2.12 area; I believe this may be an area which you would consider for alternative development, and would support this proposal more positively. As one drives out of the north of Lowestoft this area would appear to be much more natural to development than the area you have chosen at WLP2.12, being already partially built up, nearer to the town, away from the main road and sewage works and not so damaging to our wildlife, history, culture and countryside. May I just add here that the title of your document 'Future of our towns, villages and countryside' was received with some cynicism!

Attached documents
David Coe

Section 164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID 95

Comment By all means build along the new link round joining Corton Long Lane roundabout to Millennium Way. Do NOT develop the agricultural land going north from Corton Long Road.

Attached documents
Graham Hunt

Section 164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID 78

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147,179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
Mr & Mrs T Lawrence

Section 164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID 113

Comment Appendix 5 Alternatives sites. Site 164 Land west of Northern Spine Road/north of Pleasurewood Farm, Corton/Oulton shown on the strategy for Lowestoft should be given further consideration in place of policy WLP2.12 North Lowestoft Garden Village. The land on site 164 is considered to be sensitive landscape. We consider the land on policy WLP2.12 is also sensitive landscape. The access to site 164 is advised as challenging. This does not mean it is not unobtainable. There is a suggestion of site 164 of contamination from an adjacent site, the proposed site on policy WLP2.12 is adjacent to a sewer plant, surely this would pose a considerable greater risk from contamination especially in future years.
Stewart and Anne

Section 164 | Land west of Northern Spine Road/north of Pleasurewood Farm

Comment ID 128

Comment The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Access along Parkhill for pedestrians is very poor. The existing paths, both sides of the road, from The Blue boar pub towards Parkhill are very narrow, vehicles are a real risk to pedestrians trying to avoid being hit by door mirrors and the like. Two vehicles passing each other, usually speeding, don't have a very wide road either and make the problem worse. To increase the amount of pedestrian traffic due to the increased population is to increase the risk being realized, if it hasn't already. The proposed pathway along Parkhill will just extend the risks already there.

Once the traffic, heading towards Parkhill Hotel, has ignored the zebra crossing, (that should really be improved,) and no doubt been a real concern for those using the almost blind Union Lane junction, it seems putting your foot down is the norm, with no regard for those along the road trying to safely exit their property/farm/hotel. No's 2 - 8 Parkhill don't even have driveways to their homes from Parkhill, instead opting to have to use the rear of their properties via Lothingland Close, I'm absolutely sure safety was a factor in deciding that.

Trucks, or vehicles from the farm, driving both ways at the same time along that road already require one vehicle pulling over to let the other by, adding another main access for the proposed housing will be yet more traffic on a road struggling to remain a safe one. Death and serious injury has already occurred, all to often, just a short distance away from the proposed access for the houses in this location.

The recent house building of hundreds more properties from Camps Heath down to Sands lane and no doubt the hundreds more where Blundeston Prison is will already be a significant safety issue for many users of Parkhill due to the increase in vehicle and pedestrian traffic. When is enough,
There is not a great deal of facilities for those who cannot use a car around Oulton/Blundeston regarding shops, Doctors etc so all the more reason to attend to existing safety issues surrounding the pathways/roadways around Parkhill now, well before even more people using the area increases the chances of dangerous situations arising.

Attached documents
## 174 | West of Ringsfield Road, Beccles

**Jane Leather**

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<th>174</th>
<th>West of Ringsfield Road, Beccles</th>
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| Comment ID | 637 |

**Comment**

We support the decision to discount each of the sites along Ringsfield Road (marked on the Waveney First Draft Local Plan as Nos. 24, 174 and 145). They are unworthy of further consideration due to the valid reasons that have been put forward by Beccles for all three to be discounted and agree that the preferred sites for development are significantly more suitable.

In the evaluation process it has already been identified that Ringsfield Road would be a totally unsuitable access route for the Alternative Site proposal. The part of Ringsfield Road to the Western boundary of the Alternative Sites connects bridleways from Primrose Lane to Cut Throat Lane (Hangman’s Lane) and is regularly used by horse riders, cyclists and walkers. This is a narrow road with a sharp bend and hedges and there is consequently poor vision. A significant increase in volume of traffic would make it even more congested and hazardous for horse riders, cyclists, walkers and motorists.

The Alternative site in question includes Grade II Agricultural Land and it would seem irrational to build on productive agricultural land and lose it to housing for the future. Development of this Alternative site would also bring a significant impact on the rural landscape, long established hedges and wildlife.

**Attached documents**
The Waveney Local Plan identifies some alternative sites along Ringsfield Road for industrial and housing development. These are sites 24, 174 and 145. We support the council’s decision to discount these sites, for the considered reasons already given and would like to offer some additional validation for rejecting these sites.

The western boundary of these sites, Ringsfield Road, is a narrow road with two 90 degree bends which have poor visibility. We have witnessed a number of near miss collisions at these bends. This section of Ringsfield Road is used frequently by horse riders, dog walkers and cyclists. There would be a significant increase in traffic volume, should these sites be developed, with a far greater probability of traffic accidents.

These sites include valuable Grade II Agricultural land and hedgerows, which provide a natural habitat for a variety of wildlife. These would all be lost were these alternative sites to be developed and the Western approach to Beccles would lose its rural landscape.
Ringsfield and Weston Parish Council Jean Brown

Section 174 | West of Ringsfield Road, Beccles

Comment ID 181

Comment The alternative option sites identified to the West of Beccles, numbered 145, 174 and particularly 24 are not considered suitable sites as they are not supported by the relevant services, current infrastructure and can be viewed as prime agricultural land. Again there is a desire to have a clear land boundary between Beccles and Ringsfield to avoid the sense of Ringsfield becoming a satellite of Beccles or being 'swallowed' by the town.
The Waveney Local Plan has identified parcels of land that are potentially suitable for development to fulfill the future needs for housing and employment across the District. Preferred and alternative sites have been considered in Beccles including sites along Ringsfield Road identified as 24, 174 and 145 on the Draft Local Plan document. I support the decisions that each of these sites has been discounted for a number of considered, appropriate and valid reasons and would like to add some additional considerations to further validate the decisions.

These sites include Grade II agricultural land, long established hedgerows and mature trees in a small field setting. The loss of habitat and the impact on the rural landscape would be significant should this land be developed. It might also be considered that with the uncertainty of the outcome of Brexit negotiations and the possible impacts on agricultural policy and food production in the UK it would indeed be shortsighted to permanently loose highly productive agricultural land to housing.

It has been correctly identified during the evaluation process that Ringsfield Road is not a suitable access route for these sites. The road passes John Leman School, already a bottleneck during school opening and closing times and also on Saturday mornings during sports practice on the playing fields opposite the school. Additional traffic on this route would lead to more congestion and increased exhaust emissions past the school and playing fields. Exhaust emissions and the effects on air quality particularly near schools is a matter of concern for health professionals and authorities.

The section of Ringsfield Road delineating the western boundary of the Alternative Sites forms the connection between bridleways at Primrose Lane and Hangman’s Lane and is in frequent and regular use by horse riders and dog walkers. This narrow country road with hedges lining the verge can already be somewhat hazardous at existing traffic volumes. Any further increase in traffic along Ringsfield Road will only augment the hazard to
walkers and horse riders.

Part of the National Cycle Route follows Ringsfield Road proceeding from Beccles past these sites and continues on through Ringsfield Village and along School Road. Cycling is fast growing in popularity in the UK and is being encouraged for health and environmental reasons. Increased traffic density on a frequently used section of this designated National Cycle Route would compromise these aims.

The existence of better served more suitable sites to meet the needs of Beccles development should enable Waveney to choose those preferred sites and preserve green field countryside for future generations.

Attached documents
Rosemary Shaw

Section 174 | West of Ringsfield Road, Beccles

Comment ID 157

Comment
I welcome the discounting of this site for the reasons specified. Vehicular access could only be obtained via Ringsfield Road rather than London Road - and would thus not connect with the Beccles Southern Relief Road, increasing traffic flowing contrary to the direction envisaged by the relief road. Ringsfield Road is minor as well as being part of National Cycle Route number 1.

Attached documents
175 | Land to the north of the Evergreens Garden Centre, Weston

Gillian Brett

Section 175 | Land to the north of the Evergreens Garden Centre, Weston

Comment ID 120

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 175 | Land to the north of the Evergreens Garden Centre, Weston

Comment ID 223

Comment
Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
176 | Land to the west of the A145

Gillian Brett

Section 176 | Land to the west of the A145

Comment ID 121

Comment Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 176 | Land to the west of the A145

Comment ID 224

Comment
Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
178 | Carlton Motors, Rushmere Road, Gisleham

Russel Hubbard

Section 178 | Carlton Motors, Rushmere Road, Gisleham

Comment ID 90

Comment [In regards to the proposed 800 homes off The Street, Carlton Colville] The 3 smaller alternative options (no. 21, 56, 80 and 178), will be better options as the traffic will be dispersed on to several different roads

Attached documents
179 | Eades Farm, Beccles Road, Carlton Colville

B Glennon

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 172

Comment Site 179 seems more suited as is site 164. Also I believe that site WLP2.12 was turned down, 6yrs or so ago as a golf course as it would be detrimental to the wildlife and environment.

Mr Bradley is signing this in agreement.

Attached documents
Carlton Colville Town Council Alison Ayers

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 146

Comment The council would suggest a rethink of the land identified as 179 known as Eades Farm, Beccles Road, Carlton Colville. This site would offer access onto an acknowledged network namely the A146 which has good links to Norwich, Beccles and importantly Lowestoft. The site is approximately 37.96 hectares, the Bells Farm site is 55 approximately with a country park with 15 and play etc, flood mitigation of 3 bringing the development down to approx. 36 hectares therefore there is very little difference to the overall site size Site 179 would not require a country park because it sits next to WLP.18 which is the suggested sports facilities and open space where allotments, dog walking and play facilities could be provided from. There would be no difference in the infrastructure required with regards to water systems and sewerage as the proposed Bell Farm Site would require these also. The cycle paths and footpaths could be provided around the Low Farm site providing the connectivity into the existing locality of Carlton Colville.

We believe that this site would generate the same benefits as those proposed under policy WLP2.15

Our proposed use of the 179 site would allow for the existing community of Carlton Colville to continue to benefit from a semi-rural environment and also the new dwellings would also benefit from a semi-rural feel.

Attached documents
Gisleham Parish Council Derek Ward

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 174

Comment We feel WLP2.18 and 179 are the most suitable areas for housing development to the west of the town. The proximity of Castleton Avenue and Beccles Road would allow for greater access to the primary road networks making Lowestoft, Yarmouth, Beccles and Norwich convenient for commuting or leisure. Public transport links would be far easier to create than the proposed area WLP2.15.

Attached documents
Graham Hunt

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 73

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147,179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
JOHN HARRISON

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 94

Comment - Alternative options: Beccles Road [188,7, 112, 11, 179: these options border existing main road and access to Lowestoft and Beccles/Norwich and therefore may be considered better options for traffic management [Plan WLP2.15].

Attached documents
Mr & Mrs T Lawrence

Section 179 | Eades Farm, Beccles Road, Carlton Colville

Comment ID 115

Comment Appendix 5 alternative sites. Site 7 and 179 should also be given further consideration in place of policy WLP2.12 Lowestoft Garden Village due to the above concerns.

Attached documents
182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Anne & Stewart Wrigley

Section 182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Comment ID 168

Comment
You set out what you want to achieve in your First Draft Local Plan

improve quality of life

improve the health of the population

protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Brian Jones

Section 182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Comment ID 7

Comment I agree with the council comment that this site makes an attractive contribution to the townscape and the entrance to the town. It also provides a positive contribution towards the more rural feel of this locality on the edge of the town and I would add further that the council should consider this statement as appropriate for the proposed over development of the Lowestoft and Gt Yarmouth Rugby Club which is visible and adjacent to this land.

Attached documents
Forcecore Limited (Wheatman Planning Ltd) A Darling
Wheatman Planning Ltd. (Deirdre Linehan)

Section 182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Comment ID 187

Comment
Following on from the comments we have submitted in respect of the First Draft Plan we wish on behalf of our client and the landowner Forcecore Limited to strongly object to the exclusion of site ref, 182 Land South of 324 Yarmouth Road, east of Pleasurewood Hills and north of Gunton Avenue, Lowestoft from the First Draft Plan. It is considered that the reasons offered by the Council for discounting further consideration of this site from being allocated for residential use can be readily overcome and mitigated against and we will expand further on this point later in our statement.

While it is acknowledged that the Housing White Paper is only in draft form it is considered that it provides a clear indication of the way in which the Government wishes Local Authorities to respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the First Draft Plan has paid insufficient regard to this advice in not allocating sufficient small and medium sized sites such as that put forward by our client.

- The site measure approximately 0.93ha and is well related to the existing urban edge and built up area of North Lowestoft being substantially surrounded by existing development to Page 4 the north, east and south. The A47 Yarmouth Road extends along the western boundary of the site. The development of this site therefore represents a rounding off of development within the urban area.

- The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy walking distance of the site.

- The site is in single ownership and is readily available for development. These are critical considerations particularly when it is well known that sites
which are in multiple ownership can often be a constraint to delivery.

• The site is not constrained in anyway by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development. A scheme can be designed to take account of the trees on-site, as acknowledged by the earlier WDC assessment.

• Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

North Lowestoft is clearly identified within the Local Plan as an area that is appropriate for additional residential development and our client’s site is extremely well located in relation to the many services and facilities available locally. All are within walking or cycling distance of the site allowing the site to be considered a very sustainable option for development. There is also good access to public transport facilities with bus stops being found close by on the A47 Yarmouth Road providing regular services to Lowestoft and other surrounding towns and villages. The development of this site from a transport perspective therefore is also extremely sustainable and the location of the site will mean there will not be undue reliance on private cars to access everyday requirements.

In the Council’s appraisal of the site in the document “WDC Analysis of the Options for the new Waveney Local Plan July 2017” it is stated:

"Summary of Draft Strategic Housing and Economic Land Availability Assessment"

The assessment did not identify any constraints or impacts which could not be mitigated. The main issue is the potential impact on the townscape. The site currently makes an attractive contribution to the townscape and contributes towards the more rural feel of this locality. The site has a number of mature trees which benefit from tree preservation orders. Any development would need to retain the trees and be of a density appropriate to the surroundings.

A small part of the site is at risk of surface water flooding.

The hedgerows surrounding the site and the mature trees will likely support biodiversity, particularly given the good connectivity of habitats in the vicinity. There is potential for noise pollution from nearby theme park and
the holiday park. The site has a capacity for approximately 15 dwellings reflecting the lower density of the surroundings and the need to retain the mature trees on the site.

"Summary of Draft Sustainability Appraisal"

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the impact on the townscape, natural resources, the effects of climate change and efficient patterns of movement.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

The Council acknowledges in this assessment that the site does not present any major constraint or barrier to being developed for residential purposes. The main reason given for excluding the site as an allocation is the potential impact on townscape and it is felt the site as existing makes an attractive contribution to the townscape and towards the rural feel of this locality.

We do not consider this to be sufficient reason to exclude the site from the local plan and consider rather that a well designed residential development could offer an equally positive contribution to the townscape and the entrance to the town. The site consists of a modestly sized field that is currently divided into paddocks and used for the keeping of horses. A number of mature trees are found scattered throughout the site particularly in the south-western area and also extending along the eastern boundary of the site. It would be possible to design a low density scheme that retains as much of the existing natural landscaping features and maintains a rural character.

In any event the proposed large allocation WLP2.12, comprising the North Lowestoft Garden Village, which straddles both sides of the A47 will ultimately mean that the entrance to the town will shift a good deal further north away from our clients land.

There are also many benefits that can be achieved from the development of this site including the delivery of much needed affordable dwellings. There would also be significant CIL contributions arising from the development that could be used towards the improvement of existing infrastructure and the provision of new facilities locally. Open space and recreational facilities in line with current local plan policy requirements will also be included as part of any development proposal.
The Council concludes in their assessment;

"...The site is considered less favourable to the other preferred sites in Lowestoft for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Lowestoft under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of undeveloped land. As such the site is not considered suitable for allocation in this Local Plan."

It therefore seems contradictory of the Council to use the argument in the case of our clients land that "... the development of this site would result in an unnecessary loss of undeveloped land." when surely the same circumstances apply to the majority of the proposed allocations in more exposed locations beyond the edge of the settlement.

Furthermore as has been demonstrated earlier in this response the two large allocations WLP2.12 and WLP2.15 have numerous unresolved constraints that could limit both the start of development and also the number of houses delivered. These factors include access, drainage, existing on-site infrastructure and archaeological potential. Again in contrast there are no known constraints which apply to our clients land that might delay development or significantly reduce the number of dwellings delivered.

In conclusion it is believed it has been demonstrated the housing strategy proposed by the Council within the First Draft Plan places it at risk of failing to meet its annual housing target. Conversely it has also been demonstrated, more than adequately, that our clients land represents an eminently suitable site for inclusion as a residential allocation within the new Waveney Local Plan. It is a medium sized site, favoured by the Government in their recent draft White Paper on Housing as a means of delivering homes quickly in suitable locations. We believe therefore it has been unfairly discounted by the Council and we have shown clearly that it is possible to overcome and mitigate against any of the constraints identified by the Council and used as reasons for not including the site as a residential
allocation.

Attached documents  
George Redpath

Section 182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Comment ID 99

Comment Has Lowestoft Rugby Club at Gunton Park, been considered for residential development? I understand the rugby club are looking to sell their land and move to a more suitable location? Gunton Park would seem to be a natural extension of the Woodlands?

Alternatively Gunton Park would lend itself well as a sports facility similar to WLP2.18 at Oakes Farm, thus supplying a multi use sports facility at the North end of Lowestoft?

I cannot see Waveney leisure centre at Water Lane supplying the sporting needs of Lowestoft North, especially with the WLP2.12 development (1400 homes)? or do we expect Mums & Dads from Lowestoft North to drive across town to the new facility at Oakes Farm, thus increasing traffic to this area?
Stewart and Anne

Section 182 | Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Comment ID 132

Comment The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
183 | Land to the south of Hall Lane, Oulton

Kenneth Houchen

Section | 183 | Land to the south of Hall Lane, Oulton

Comment ID | 13

Comment | I wish to object to the First Draft Local plan and to the exclusion of our/my site at Hall Lane Oulton (WDC ref site 183) as a residential allocation within the LP.

I also disagree with the reasons offered by the District Council for discounting this site which are as follows;

"The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation".

In the "Analysis Of the Options for the New Waveney Local Plan" document which provides more details of the assessment process undertaken by the District Council the following comments are made in respect of the site:

"Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is accessed from Hall Lane and Wood Lane, which are both narrow carriageways in this location in open countryside. There is no pedestrian access to the site without substantial improvements which is unlikely to be viable. Therefore the site is not considered suitable for development.

Other issues identified include a need for landscape mitigation giving the open and isolated character of the site.'

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to impact on the landscape, access to services and facilities, natural resources and efficient
patterns of movement.

A minor positive effect was identified in relation to meeting housing need.

Conclusion

The site is isolated in open countryside with no safe pedestrian access and poor vehicular access. As such the site is not considered suitable for allocation.

I do not agree with the assessment of the site being located in open countryside when it can clearly be seen that it is located in close proximity to the hamlet of Camps Heath and the cluster of dwellings that extend along Fisher Row & Holly Hill located only a short distance from the site to the west.

The site is also located just beyond the northern boundary of the large residential site known as Woods Meadow which is currently being developed. This site will eventually provide 800 new dwellings as well as new community facilities including a new primary school, local shopping facilities and also a country park that will almost extend up to the boundaries of my/our site. In only a very short time therefore substantial new housing will be found in very close proximity to the southern boundary of our/my land. This development will provide the opportunity to achieve safe pedestrian/cycle links from my/our site to those located within the new development and also further beyond in Oulton and Oulton Broad.

No formal highway comments have been quoted to support the assessment that the site does not have safe vehicular access. Given that the land is currently used for the keeping of horses and therefore has large vehicles including horse boxes regularly visiting and leaving the site I/we consider that residential use of the site will lessen the highway impact of vehicular traffic currently generated by the site.

The site measures 0.86ha and offers an opportunity for a low density well designed residential development that will relate well to its surroundings. We do not agree that the site is open in character as mature and well established hedges extend around the northern and western boundaries of the site and every effort will be made to retain as much as possible existing trees and hedges to minimise the visual impact of any new development. There is also the possibility that the land can be developed as self build/custom build housing. Paragraphs 8.23 to 8.26 inclusive of the First Draft Plan discuss the requirement that is being placed on each local authority to make adequate provision for self build/custom build housing within their
local plan. In para 8.23 it is stated that there are currently insufficient self
build plots available in Waveney while para 8.25 indicates that there are
currently 102 individuals on the register looking for self build plots. There is
therefore a need to identify viable sites that will provide self build plots and
we consider that my/our land provides the ideal opportunity to assist the
Council in meeting their self build sites requirement. Another important
and very relevant consideration is that the land can be made available for
development immediately. It is not reliant on a long lead in process in
gaining planning permission for a large development of 100 or more
dwellings which could take many years to achieve before making any
contribution towards relieving the demand for self build plots.

Overall therefore It is our opinion that our site is found in a sustainable
edge of settlement location rather than being located in open countryside
and is ideally suited to be developed for residential use. It offers real
potential to be developed for self build/custom build housing and would
assist the Council in meeting their targets for this form of development. We
therefore ask the Council to reconsider their assessment of the site and
include it as a residential allocation within the Local Plan.

Attached documents
184 | Oakenshaw, Parkhill, Oulton

Anne & Stewart Wrigley

Comment ID 167

Comment

You set out what you want to achieve in your First Draft Local Plan

improve quality of life

improve the health of the population

protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Graham Hunt

Section 184 | Oakenshaw, Parkhill, Oulton

Comment ID 80

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147,179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
Stewart and Anne

Section 184 | Oakenshaw, Parkhill, Oulton

Comment ID 131

Comment The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
185 | Parkhill, Oulton

Anne & Stewart Wrigley

Section 185 | Parkhill, Oulton

Comment ID 166

Comment
You set out what you want to achieve in your First Draft Local Plan
improve quality of life
improve the health of the population
protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Graham Hunt

Section 185 | Parkhill, Oulton

Comment ID 79

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147, 179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
Stewart and Anne

Section 185 | Parkhill, Oulton

Comment ID 130

Comment The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
187 | Plot 'H', Blundeston Road, Oulton

Anne & Stewart Wrigley

Section 187 | Plot 'H', Blundeston Road, Oulton

Comment ID 165

Comment
You set out what you want to achieve in your First Draft Local Plan
improve quality of life
improve the health of the population
protect and enhance the environment

Placing the Garden Village where you are suggesting (WLP 2.12) does not meet your criteria, in fact your suggestions are in opposition to your criteria. The site destroys the environment, does not improve the quality of life or health of the population and it is not safe.

If it does not meet your own criteria this suggestion must not proceed.

The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
Stewart and Anne

Section 187 | Plot 'H', Blundeston Road, Oulton

Comment ID 129

Comment The alternatives of 164, 187, 185, 184 and 182 do meet your criteria better as they add onto existing developments and are closer to shops, schools and other facilities.

Attached documents
188 | Rear of 334 Beccles Road, Carlton Colville

Graham Hunt

Section 188 | Rear of 334 Beccles Road, Carlton Colville

Comment ID 74

Comment WLP2.15 This area has very poor access to main roads. Potentially with the proposed 800 houses there could be up to 1,600 cars introduced to the area. With sustainable transport being the ideal future direction in the region and country as a whole. The key aim should be to reduce car journeys and have all large areas of housing closer to major road networks to ensure bus routes can be utilised. This would make the following areas 147,179, 188, 7, 112, 111, 164, 185 & 184 far more sensible areas to have as preferred sites of development. Having urban areas in poorly linked areas increases congestion and both noise and fume pollution.

Attached documents
JOHN HARRISON

Section 188 | Rear of 334 Beccles Road, Carlton Colville

Comment ID 91

Comment - Alternative options: Beccles Road [188,7,112,11,179]: these options border existing main road and access to Lowestoft and Beccles/Norwich and therefore may be considered better options for traffic management [Plan WLP2.15].

Attached documents
190 | Land off Hall Road, Blundeston

Blundeston & Flixton Parish Council Sarah Wells

Section 190 | Land off Hall Road, Blundeston

Comment ID 56

Comment This site is adjacent to site 20 above and is indeed a part of the same large field stretching across from Church Lane to Hall Road. The scale of any proposed development on this site would be completely out of keeping with the size and character of the village and would seriously impact on existing facilities and infrastructure. At currently acceptable densities this site would accommodate approximately 120 dwellings. We strongly support your conclusion that this site, and the scale of any proposed development, is unsuitable for allocation as part of the local plan for housing development. This would represent a serious incursion of housing into the open countryside surrounding the village. Furthermore, and as you note, it is high quality agricultural land and we would suggest that it should never be considered as suitable for development either now or at any time in the future.

Attached documents
Isaac Francis

Section 190 | Land off Hall Road, Blundeston

Comment ID 520

Comment I would suggest that sites such as 114 were pursued for expansion of Corton, or WLP7.3, WLP7.4, 42, 27, 29, 190 or 20 for expansion of Blundeston.

Attached documents
Melanie Wright

Section 190 | Land off Hall Road, Blundeston

Comment ID 50

Comment
This site is prime agricultural land, current being farmed with arable crops. Access to this site would be from Hall Road (which would also be the main access road for the dwellings being put up on the old prison site) or Church Road (which already has issues with parents picking up/dropping off children at the school). Neither of these roads are of good condition, nor are they able to cope with a large increase in usage.

Attached documents
191 | The Geranium Pot, Mariawood, Hulver Street

S Read
Marrons Planning (Jenny Keen)

Section 191 | The Geranium Pot, Mariawood, Hulver Street

Comment ID 206

Comment
The site represents a parcel of primarily brownfield land and equates to approximately 0.98 hectares in size. The site has capacity for approximately 7 homes.

The site is located on the southern edge of the built up area of Hulver Street. The site is bounded to the north by Hulver Street, to the east by Greenfield land, to the south by further Brownfield land and to the west by existing residential development.

Whilst it is acknowledged that Hulver Street is a hamlet with few services and amenities, it does have village hall (that is used for Folk music practice, Indoor Bowls, Yoga, Parish council meetings, and can be rented out for private functions) and a bus service connecting it to Beccles and Wangford. Also, as proposed in the emerging Local Plan, when coupled with Henstead (a hamlet to the east) Hulver Street also has a church, school, the Hundred River Maze tourist attraction, an equestrian club and a pet store. There is also a crematorium at nearby Ellough. In addition, the village is close to the Beccles and Worlingham area (circa 3 miles) which is identified in the plan as the second most sustainable settlement after the main centre of Lowestoft falling within tier 2 of 6 in the proposed settlement hierarchy. Therefore any development here can also be seen to be supporting the services and facilities in Beccles and Worlingham, especially with Hulver Street being conveniently located south of the settlement close to the two proposed allocations for mixed use and employment use and the proposed Beccles Southern Relief Road.

In addition, the site constitutes Brownfield land consisting of various uses including an existing dwelling, stables (with planning consent for change of use to holiday lets), and an existing light industrial and storage use.
Therefore, the site represents a good opportunity for the reuse of Brownfield land in order to contribute towards fulfilling the Council’s housing land requirements.

The Council have acknowledged in the FDP that through allowing more growth than in recent years, settlements in the rural areas will become more sustainable and vibrant. The FDP also notes that new housing will help support existing services and facilities in the rural areas such as small rural schools. With this in mind, it is noted that supporting document Analysis of Options Consultation Paper July 2017 states that the sustainability appraisal of the site did not identify any significant effects or any constraints that could not be mitigated, and also identified that the site could provide housing to meet local need.

The site is not located in an area at high risk of flooding and initial investigations into drainage and service infrastructure indicates that there is a good system currently in place.

Whilst it is acknowledged that the Analysis of Options Consultation Paper July 2017 identified topographical issues associated with the existing access and visibility splays, access to the site was assessed during the application process for planning permission reference DC/12/0860/FUL and a safer more suitable access arrangement has been approved for the site and partially implemented (see Appendix 1 for details of this access arrangement).

Whilst it is acknowledged that the site is opposite an Area of Outstanding Natural Beauty (AONB), the site currently consists of a number of run down buildings and any development of the site would be carefully designed and landscaped accordingly in order to improve the impact on the setting of the AONB. In addition, whilst the site lies within the Tributary Valley Farmland Landscape Area, again for the same reasons, it is submitted that any impact from development on the setting of the countryside will be minimal and can be mitigated with appropriate landscaping. To the east of the site is the old Rectory, a Grade II Listed Building, and whilst any development will need to consider impact on its setting, it is noted that there is a considerable separation distance between the site and the Listed Building and again careful landscaping on the eastern boundary can mitigate any perceived impact.

Whilst we agree with the overall approach to development in rural areas as set out in WLP7.1, we strongly submit that development in relation to the Countryside should not solely rely on sites coming forward through
Neighbourhood Plans and windfall sites, but where there are suitable, available and deliverable sites now, these should be allocated in the emerging Local Plan alongside other sites identified in the larger and smaller villages.

In this respect and in adopting the "Brownfield first" approach, we submit that the site at Mariawood, Hulver Street provides an excellent opportunity to allocate land in the Countryside for development. A key soundness test of Local Plans is that they must be justified (NPPF, paragraph 182), meaning they must be based upon appropriate and proportionate evidence. In this respect, it is noted that the Analysis of Options Consultation Paper July 2017 has already appraised the site and did not identify any significant effects or constraints that could not be mitigated against. This document also noted that the site could provide housing to meet local need.

The site at Mariawood consists of primarily Brownfield land and equates to approximately 0.98 hectares in size. The site has capacity for approximately 7 homes (as identified in the Analysis of Options Consultation Paper July 2017). Whilst Hulver Street and Henstead are not the most sustainable settlements, there is a village hall and bus service connecting the settlement with Beccles and Wangford and Henstead has a church and a private school, equestrian club and pet store. In addition, the site is available for development now and can immediately contribute towards the Councils five year supply of housing land.

In addition, in accordance with commentary made in the vision for the FDP, allocating small scale sites for development such as Mariawood will help settlements such as Hulver Street and Henstead become more sustainable and vibrant. A small number of houses on Brownfield land such as this can support the existing community, the local school and the parish church.

Whilst it is acknowledged that the Analysis of Options Consultation Paper July 2017 identified topographical issues with the existing access and visibility splays, access to the site was assessed during the application process for planning permission reference DC/12/0860/FUL and a safer more suitable access arrangement has been approved at the site and partially implemented. In any event, site access and associated traffic alongside all other technical matters will be professionally assessed at the point of any application being submitted. Proposals will consequently be designed at application stage with each discipline in mind proposing mitigation measures as necessary.

Paragraph 8.39 of the FDP states that, "Approximately 10% of new housing
to be delivered in the rural areas of the District is to be located in hamlets and scattered settlements within the Countryside. Small scale developments can support communities by delivering housing types and sizes that are needed locally and provide opportunities for members of the existing community to live nearby and retain their social connections...there are occasions where small scale development could occur which could provide social and economic benefits to the Countryside, with limited impacts on the environment or character of the area..” We wholly agree with this statement which reinforces the need to allocate land (such as Mariawood) for development now which will help in securing the 10% development requirement for the Countryside.

Attached documents

193 | School Farm, Ilketshall St Lawrence

Michael Neave

Section 193 | School Farm, Ilketshall St Lawrence

Comment ID 33

Comment I always thought that any development plans should be within the village boundaries and I plead with you to reconsider this proposed site and use the alternative site within the village.

Attached documents
199 | Land south of King's Lane, Weston

Peter Spaans

Section 199 | Land south of King's Lane, Weston

Comment ID 12

Comment Please reconsider this application. The site is used to store caravans and would be better suited to supply local people particularly youngsters looking to start a home who live and work in the area. It is situated opposite existing old farm workers cottages and the addition of similar affordable homes would greatly enhance the area and improve the value of the homes.

Attached documents
204 | Harbour Road, Lowestoft

Ben Falat

Section 204 | Harbour Road, Lowestoft

Comment ID 2

Comment Site-54 appears to have been deleted from this Plan (?). Sites 204 & 54 combined appear to be ideally suitable to mixed use housing and marina; there is probably less contamination here than on the Caldecott Road, Oulton Broad site presently being developed by Badger Builders. Clearly facing onto the ugly Brooke 'hangar' at present, but doubtless within the timescale of the current draft Plan that Brook peninsula site will be developed and this 204/54 site becomes appropriately attractive; indeed for housing young families it has potential positive attraction in being a quiet cul-de-sac nevertheless very close to railway station and local amenities (shops in OB & Park over the footbridge. There is no valid reason for rejecting this site.

Attached documents
G Hayward
Philip Dean Limited (D Goodman)

Section 204 | Harbour Road, Lowestoft

Comment ID 127

Comment Site 54 has been discounted as an area of growth in the first draft of the local plan. This site should be re-considered and re-instated. In the Strategic Housing + Economic Land Availability Assessment 2017, site 54 was considered Suitable and Achievable, but not available. This is incorrect. It is available to the same extent as the neighbouring site at 204 which has been considered 'available'. Both sites have potential contamination but site 54 has been discriminated against as being potentially contaminated and not 204. There is no logic in accepting 204 without accepting site 54. Furthermore, site 54 is currently allocated for growth (employment) in the present adopted local plan.

Site 54 was previously developed as a wartime boatyard and manufacturing base. There's no reason to prevent its further and future development for housing or alternative use. The site satisfies the requirements of being 'Suitable', Achievable' and 'Available'.

Attached documents
207 | Land to the west of Evergreens Garden Centre, Weston

Gillian Brett

Section 207 | Land to the west of Evergreens Garden Centre, Weston

Comment ID 122

Comment

Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 207 | Land to the west of Evergreens Garden Centre, Weston

Comment ID 226

Comment
Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
208 | Broadside Park Farm, Reydon

Mr and Mrs Goaman

Section 208 | Broadside Park Farm, Reydon

Comment ID 34

Comment Preferred alternative area – possible 208 (already building on 5 38 26).

Attached documents
209 | Land south of Mountbatten Road, Bungay

Bob Prior

Section 209 | Land south of Mountbatten Road, Bungay

Comment ID 670

Comment I agree that we need more housing, but would suggest that the allocation of WLP5.1 be moved to abut WLP5.2 on plot 209. This would be far less problematic and more cost effective to develop whilst avoiding the flooding and drainage issues associated with WLP1. It would also make St John's Hill safer (although some safety engineering works will still need to be undertaken) as there would be fewer junctions needed. The motor traffic could come through already planned developments, and footpaths and cycle-ways could be routed though well established estates or onto St. Margaret's Road.

Attached documents
<table>
<thead>
<tr>
<th>Section</th>
<th>209</th>
<th>Land south of Mountbatten Road, Bungay</th>
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</thead>
<tbody>
<tr>
<td>Comment ID</td>
<td>213</td>
<td></td>
</tr>
<tr>
<td>Comment</td>
<td>We feel that plot 209 on an earlier version of the plan (see the current Appendix for Bungay) should be reconsidered for development. This would have access through the other allocated sites, WLPS.2 and that already allocated for development round the swimming pool. All access would then be onto St John’s Road from the west. A supermarket could be incorporated into the site.</td>
<td></td>
</tr>
<tr>
<td>Attached documents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Malcolm Tate

Section 209 | Land south of Mountbatten Road, Bungay

Comment ID 84

Comment It would have been a better option to develop this site along side the proposed site WLP5.2, thus all house building numbers could have been meet on one site.

Attached documents
Mr C A Gray

Section 209 | Land south of Mountbatten Road, Bungay

Comment ID 30

Comment I believe it would be better for the local environment and the local economy if the field marked 209 and / or the middle school playing field were built on in preference to this site.

Attached documents
211 | East of Cromwell Road, Ringsfield

Gillian Brett

Section

211 | East of Cromwell Road, Ringsfield

Comment ID

123

Comment

Serious consideration should be given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield. The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11, 211 and 10 could be used with little impact on the community and agriculture. Smaller, scattered developments, are more in keeping with the area.

Attached documents
Mark Brett

Section 211 | East of Cromwell Road, Ringsfield

Comment ID 228

Comment Serious consideration given to using some of the 'Alternative Options' to take up any reduction in numbers at Ringsfield (or anywhere else). The areas numbered 107, 124, 175, 176, 36, 207 should be looked at. These areas have excellent direct access to main roads and would have little impact on existing housing. Other smaller areas like 11,211 and 10 could be used that would also have little impact both to the community and agriculture. Smaller, scattered developments, are more in keeping with the area outside Beccles itself.

Attached documents
Rachel Ducker

Section 211 | East of Cromwell Road, Ringsfield

Comment ID 64

Comment

After reading the first draft, I would like to express that as a resident from Ringsfield, I do not agree on building new homes on the proposed "alternative areas" within Ringsfield.

I do not feel it would be a positive move for the village.

The reasons for this is that at present I do not feel the village has the infrastructure to support such an idea and by creating new infrastructure I believe that this will have a dramatic impact on the traffic in and out of the village.

We live on Cromwell Road and already suffer from high traffic levels and excess speeding on a daily basis, so have concerns that this will not only increase traffic levels further but will create more problems for speeding causing danger to local residents, especially with the new relief road being built, which will no doubt also have a high impact.

On the point of the new relief road, there are also concerns about flooding in certain areas, which we hope you will research and take into consideration.

I have copied in our Parish Council so that they have note on this correspondence and thank you for your time.

Attached documents
**Sites Submitted During First Draft Consultation**

**Albert Jarvis Limited Colin Cooper**

<table>
<thead>
<tr>
<th>Section</th>
<th>Sites Submitted During First Draft Consultation</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>189</td>
</tr>
<tr>
<td>Comment</td>
<td>The primary objective behind this proposal is to include the site known as Norwich Road Industrial Estate for redevelopment.</td>
</tr>
<tr>
<td></td>
<td>I would like to propose the Planners add a further site to the draft plan.</td>
</tr>
<tr>
<td></td>
<td>I am proposing the area North of Denmark Road, East of Rotterdam Road and South of Norwich Road and West of Stevens Street to be designated for residential development.</td>
</tr>
<tr>
<td></td>
<td>My reasons for supporting this proposal are:</td>
</tr>
<tr>
<td></td>
<td>Upon completion of the Third Crossing in 2022 there will be good access in and out of the town by road Southbound.</td>
</tr>
<tr>
<td></td>
<td>The area already enjoys good access in and out Northbound;</td>
</tr>
<tr>
<td></td>
<td>The area has close proximity to the existing North Quay Retail Park which continues to expand and develop;</td>
</tr>
<tr>
<td></td>
<td>There are leisure and pleasure facilities already close to hand and within walking distance;</td>
</tr>
<tr>
<td></td>
<td>The area is within comfortable walking distance to the town centre;</td>
</tr>
<tr>
<td></td>
<td>Following the relief work undertaken by Anglian Water a few years ago, there has been no flooding;</td>
</tr>
<tr>
<td></td>
<td>The Council's policy of encouraging light industry and commercial activities to move away from the centre to the outskirts of the Town would be considerable enhanced;</td>
</tr>
<tr>
<td></td>
<td>I believe the pointers listed above go a long way to support the primary objectives of the Council's planning strategy for Lowestoft.</td>
</tr>
</tbody>
</table>
(map attached)

Attached documents  
http://consult.waveney.gov.uk/gf2.ti/af/799778/135366/PDF/-/8704373%20201%202017%202009%202019%2020Irvin%2020Limited%20Collin%2020Cooper%2020Site%2020Planpdf.pdf
Section Sites Submitted During First Draft Consultation

Comment ID 890

Comment WP7.16 Land North of Chapel Road, Mutford

The land to the north of Chapel Road is a good location for adding developments, however the particular site selected has some issues that have not been mentioned in the plan as follows:

* The area immediately in front the site WP7.16 is a very congested area in the village as it has some of the oldest properties located there. This includes the original Blacksmiths building and the original Holly Farmhouse. This means that the road is very narrow and there is a sharp bend just prior to the location coming from the east, and there is limited off road parking for existing residents.

* Due to the age and history associated with this area, with the original Holly Farmhouse, Blacksmiths Shop and the old Chapel location, it would be sad if this area was change by adding a new development

* There is an alternative site readily available on the same field. By moving the development further west along Chapel road towards Mutford Church and utilise the same field to the north of the road, but between the Mill Road Junction and the property called Church View, all of these issues could be avoided. This offers the following:

  * There is ample room for a development that could contain all the properties allocated for Mutford in the WLP (WLP&.15 and WP&.16).

  * This location is outside the Area of Outstanding Natural Beauty and therefore there would be fewer restrictions on the size and type of property (see comments on the Vision for WLP).

  * Chapel Road in this area links to the main sewer in the village and, as the field is on higher ground, there will be no drainage problems.

  * There is open ground to the front and rear of this location and therefore offers the opportunity to develop a very sympathetic location that fits the
rural area and is in keeping with the current style and layout of Mutford.

* Chapel Road, in this area, is straight and is the least used within Mutford. It therefore offers much safer access onto Chapel Road than at any other point.

* With appropriate landscaping this location has the potential to provide habitats for the wildlife and provide a stepping stone between Mutford Big Wood to the other woods and wildlife sites in the area. Neither of the other sites would do that.

* With good site planning and landscaping, any impact on the area could be completely minimise and, the location would be one of the better areas to live in the village, enhancing the health and enjoyment of those who live there.

* Because the location is within the confines of the village, the occupants would feel part of the village and be more incline to use the Village Hall close by, and not feel like outcasts on the edge of the village confines.

Attached documents
G Duke

Section  
Sites Submitted During First Draft Consultation

Comment ID  145

Comment  
In Southwold itself, there appears to be a total three brownfield sites fronting Mights Road and the impact of developing these sites would be minimal, resulting in no loss of precious greenfield land.

Attached documents
G Youlten  
Wheatman Planning Ltd. (Deirdre Linehan)

<table>
<thead>
<tr>
<th>Section</th>
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<tbody>
<tr>
<td>Comment ID</td>
<td>214</td>
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<tr>
<td>Comment</td>
<td>Land East of Parkhill, Oulton, Lowestoft</td>
</tr>
</tbody>
</table>

While it is acknowledged that the Housing White Paper is only in draft form it is considered that it provides a clear indication of the way in which the Government wishes Local Authorities to respond to the housing crisis and the dearth in supply of houses across the country. It is believed that the First Draft Plan has paid insufficient regard to this advice in not allocating sufficient small and medium sized sites such as that put forward by our client.

- The site has an area of approximately 1.25ha and is well related to the existing urban edge and built up area of North Lowestoft being substantially surrounded by existing development to the east, west and south. The development of this site therefore represents an opportunity for development within the urban framework of the town, without an excursion into open countryside.

- The site is found in a sustainable location with good access to everyday facilities and services and with good public transport links within easy walking distance of the site.

- The site exhibits all the locational factors identified for the proposed allocation WLP2.13 (Land North of Union Lane), in particular:

"The site has good access to existing services and facilities in Oulton and in the future will have good access to the primary school, community centre, medical centre and retail facilities which are to be provided on the Woods Meadow development. The site is also in close proximity to the Mobbs Way Employment Area. There are bus stops nearby which provide access to the town centre. Development of the site is expected to have a limited impact on the landscape and is not used for agriculture."
• The site is in single ownership and is readily available for development. These are critical considerations particularly when it is well known that sites which are in multiple ownership can often be a constraint to delivery.

• The site is not constrained in anyway by for example flood risk, access, land contamination and there will be no excessive costs involved in preparing the site for development.

• Once planning permission is granted the site will deliver houses quickly. This is a critical requirement of any site that is allocated within a local plan and the NPPF places particular emphasis on the delivery of housing and not just the allocation of land.

North Lowestoft is clearly identified within the Local Plan as an area that is appropriate for additional residential development and our client’s site is extremely well located in relation to the many services and facilities available locally. All are within walking or cycling distance of the site allowing the site to be considered a very sustainable option for development. There is also good access to public transport facilities with bus stops being found close by providing regular services to the town centre and other surrounding towns and villages. The development of this site from a transport perspective therefore is also extremely sustainable and the location of the site will mean there will not be undue reliance on private cars to access everyday requirements.

The site would provide readily available land to assist with the provision of housing supply without impact on the open countryside.

Furthermore as has been demonstrated earlier in this response the two large allocations WLP2.12 and WLP2.15 have numerous unresolved constraints that could limit both the start of development and also the number of houses delivered. These factors include access, drainage, existing on-site infrastructure and archaeological potential. Again in contrast there are no known constraints which apply to our clients land that might delay development or significantly reduce the number of dwellings delivered.

In conclusion it is believed it has been demonstrated the housing strategy proposed by the Council within the First Draft Plan places it at risk of failing to meet its annual housing target. Conversely it has also been demonstrated, more than adequately, that our clients land at east of Parkhill represents an eminently suitable site for inclusion as a residential allocation within the new Waveney Local Plan. It is a medium sized site, favoured by the Government in their recent draft White Paper on Housing
as a means of delivering homes quickly in suitable locations. We believe therefore it has been unfairly discounted by the Council and we have shown clearly that it is possible to overcome and mitigate against any of the constraints identified by the Council and used as reasons for not including the site as a residential allocation.

Halesworth Playing Fields Association David Thomas

Section Sites Submitted During First Draft Consultation

Comment ID 185

Comment On another separate but related subject, HPFA owns a separate site, the Baisley Ground at Bramfield Road Halesworth, directly opposite the entrance to Blyth Road Industrial Estate. This site has in the past been used for junior football. It has been far from ideal and the Football Association has recently condemned it for such use. A letter HPFA received from Suffolk FA confirms this and a copy can be supplied if required. This site is redundant to HPFA’s needs as junior football now takes place on its Dairy Hill site. HPFA therefore has no further use for this site. The HPFA requests that this site be listed for a small scale housing development. The proceeds of its sale will be used to finance the continued development of the sporting facilities at the Dairy Hill site. The objectives of HPFA’s Business Plan will be more quickly achieved and the strategy behind Policy WLP 4.1 will be fully supported.

Attached documents
Keith Winter
Savills (Peter Start)

Section
Sites Submitted During First Draft Consultation

Comment ID
183

Comment
We refer to the above Consultation and our previous submission to your initial Call for Sites, details of which please find attached.

Our client owns the land immediately to the south of the Carlton Colville Primary School. One of the reasons they had tabled their land, as detailed in the earlier submission to you, was to raise the possibility of enabling development land as part of a possible release of other land for expansion of the Primary School grounds and on site car parking.

Whatever other development may in future take place in Carlton Colville presumably the existing Primary School will remain. As such, we believe it would be strongly preferable for parents to be able to safely deliver and collect their children using a car park on the same side of the road as the School.

We therefore ask you to consider this opportunity again as part of your future planning for this area. Our client owns other nearby land which you may feel would be better placed to provide scope for enabling development which we can clarify with you. We trust there will be an opportunity to discuss this proposal with you before you decide if it should be built onto the new Local Plan.

Attached documents
**Mr & Mrs R J Miller**  
**J Hill**

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<thead>
<tr>
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<table>
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<tr>
<th>Comment ID</th>
<th>192</th>
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<tr>
<th>Comment</th>
<th>Site Details:</th>
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**Address:**  
Land adjacent to Hill Road & Wangford Road (B1126), Wangford,  
Beccles,  
Suffolk  
NR34 8AS

**Site Area:** circa 2.5ha (6 acres)

**Site Owners** The site is wholly owned and occupied by Mr & Mrs RJ Miller

**Current & Potential Use:**

The site is currently in agricultural use as moderate quality arable farm land (Grade 3). There are no existing buildings on the site. The existing arable farming operation currently undertaken on this relatively small site would be absorbed into the remaining agricultural holding.

The proposed use for the site is to provide a mix of residential housing types in order to off a broad range of opportunities for people wanting to live in the village. The intention would be to focus on the provision of houses aimed at permanent occupation. In addition the opportunity exists at the northern end of the site (fronting the B1126) to create a sense of arrival into the village (when travelling in from Reydon & Southwold) in the form of a dedicated open space centred around a small village green, situated to the south east of the Hill Road/Norfolk Road/Church Street/ Wangford Road junction. This green space would extend south into the lower lying area providing an attractive pedestrian gateway/link to the new housing proposed along Hill Road. Surf water attenuation could also be
provided within any soft landscaping proposals. Also within the land available new pedestrian footpath links could be provided to the existing housing along and behind Hill Road (on the western side). Development in this location would also arguably complete the development of this part of Hill Road where the local authority housing was developed in the post war years.

After allowing for landscaping and green space area in the lower lying areas it is calculated that circa 2ha of residentially developable land can be made available. Given that the land immediately to the east of the site proposed is also within the same ownership the opportunity exists to finesse the actual site boundaries as part of any detailed proposals in order to make best and most efficient use of this particular site and its juxtaposition with the local road network and key local facilities (such as the Doctors Surgery, located a short walk away on Church Street - see plan).

In terms of site capacity assessments and densities these would be very driven from utilising the site contours to position two storey housing in areas where it would have least visual impact with 1.5 storey housing being located on the higher land to minimise the impacts on the AONB. In this respect the intention would be to exploit both the natural rising contours of the adjacent land to the east, south and north and the backdrop of existing two storey housing to the west side of Hill Road. Also, there is considerable existing mature hedgerow and tree belt planting along three sides which, together with additional structured planting, could be delivered via a landscape and visual impact assessment which would accompany any detailed proposals.

In view of the above, and given the net developable site area of circa 2ha this would suggest a site capacity of between 35-40 dwellings based on appropriate low density development of 18-20 plots per hectare (ha).

In terms of obstructions, hindrances or potential delays to development, both underground and overhead services are very few and far between within the site as indentified. The HV overhead power lines that run from north to south along the eastern fringes of the village then veer away from the site once they cross the 81126. Likewise the new high pressure water main laid within the last couple of years (to supply water to Reydon/Southwold area) has no impact on the site. This is because where it also passes close to the eastern fringes of the village (as with the HV overhead lines) it then veers sharply to the east just to the north of the 81126 to follow its route towards Wangford Hill. These services are all shown (for identification purposes only) on the attached aerial photograph.
That said mains water, electricity and drainage are all available to the edge of the site.

Availability:

The site could be made available within 12-24 months to allow time for any planted crops or rotational planting to be harvested. The land is not within any Environmental Stewardship or other agricultural/environmental long term land management agreements and is owner-occupied. There are no obstacles to immediate delivery or indeed for staged delivery over a number of years depending upon the size of any allocation made and local demand.

Viability:

The site is considered to be viable for residential use. There are no obvious signs of contamination from a walkover survey of the site or from a review of historic uses of the site and historic OS data.

The site is bounded by adopted highways to both the western and northern frontages and ownership and control of additional land fronting the two highways (outside the proposed site boundaries) also rests with the site owner/occupiers.

In putting this site forward for residential development, it has been assumed that both CIL and affordable housing provisions (percentage to be negotiated) will be required as part of any consent for residential development given the residential capacity envisaged. Should a substantially reduced housing provision be proposed then this position may be subject to review. In addition and as articulated elsewhere within this proposal, additional public open space (in the form of a small village green at the entrance to the village from Reydon/Southwold) could be included as part of a detailed landscape vision to accompany any future application.

Site Visit:

The majority of the site is visible from the adjacent public highways front the site. However, long established native species hedgerows have been maintained along the boundaries to the site which may restrict views at certain times of the year.

On site access can be arranged at any reasonable time via the agent (contact details below).
Additional Comments:

The site offers a unique opportunity to meet the housing needs of the village for the forthcoming plan period whilst at the same time providing a real opportunity to create a sense of arrival when entering the village from Reydon/Southwold/The Heritage Coast along the B1126 (the primary route through the village). Moreover the site is almost entirely self sufficient both in being able to provide flexibility in accessing the site from the local highway network and in not being prejudiced by existing adopted mains services meaning that development of the site could be brought forward comparatively quickly and easily. Further development of this site would not lead to overlooking of any private amenity spaces serving existing residential areas and would not have significant impacts on the AONB given that the site is bounded either by existing development or rising land.

Access to key community facilities such as the Doctors Surgery, bus stops, village shops, and public houses can all be easily achieved on foot and without having to cross the main road through the village. It is for this reason that it is understood the Parish Council previously identified land 'South of B1126' as one of its preferred locations for future residential development.

Should you require any further information at this stage then please do not hesitate to contact the writer. In the meantime we look forward to discussing with you the potential for this site to meet the housing needs of the village (in whole or in tandem with other smaller sites) during the lifespan of the new Local Plan.

Attached documents

http://consult.waveney.gov.uk/gf2.ti/af/799778/135027/PDF/-8705813%201%20Land%20off%20Hill%20Road%20and%20Wangford%20Road%20Wangfordpdf.pdf

http://consult.waveney.gov.uk/gf2.ti/af/799778/135028/PDF/-8705813%201%20Wangford%20Local%20Plan%20prop
Mr and Mrs Wright
Howards Estate Agents (Adam Halls)

Section | Sites Submitted During First Draft Consultation

Comment ID | 193

Comment | Ready available site well related to country. Area is locally served by extensive development and factories. Causes little impact on the open countryside. Small site ready to contribute to housing supply without any known constraints.

Attached documents | http://consult.waveney.gov.uk/gf2.ti/af/799778/135086/PDF/-/8710517%201%202017%2009%2022%20Mr%20and%20Mrs%20Wright%20site%20planpdf.pdf
Robert Holmes
GMP Architecture (Gary Pearce)

Section
Sites Submitted During First Draft Consultation

Comment ID
162

Comment
Introduction

In the context of the current review of the Waveney Local Plan and the decision not to allocate Site 19 - Halesworth Road, Redisham and Site 157 - West of Redisham Road, Brampton, a plot of land in Redisham is proposed as an alternative residential allocation.

Location of site

The proposed site is located on the Redisham Road, Redisham between Elm House to the south and Rose Villas to the north. It is approximately 0.8 kilometres north of the centre of the village, 8 kilometres south of Beccles and 10 kilometres north-east of Halesworth.

Site Analysis

The site is flat and is currently used as pasture with rough grass all over. The boundaries are defined by mature native mixed species hedges punctuated with mature indigenous trees with the northern boundary supporting numerous mature trees. There is also a ditch draining to a small pond on the northern boundary.

The existing vehicular access to the site is located in the north-east corner of the site and affords good visibility in both directions along the Redisham Road.

Redisham is characterised by ribbon development of houses along the roads with predominantly individual houses located within generous plots with isolated houses located further towards the edges of the parish boundary.

Planning Policy Context
The planning policies considered relevant to this proposal are listed below.

National Planning Policy Framework 2012

Paragraph 9.

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

* making it easier for jobs to be created in cities, towns and villages;
* moving from a net loss of bio-diversity to achieving net gains for nature;
* replacing poor design with better design;
* improving the conditions in which people live, work, travel and take leisure; and
* widening the choice of high quality homes.

Paragraph 17.

Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

* be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
* not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
* proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the
needs of the residential and business communities;

* always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

* take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

* support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

* contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

* encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

* promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

* conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

* actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

* take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Paragraph 29.

Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health
objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

Paragraph 34.

Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

Paragraph 55.

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

* the essential need for a rural worker to live permanently at or near their place of work in the countryside;

or

* where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or

* where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or

* the exceptional quality or innovative nature of the design of the dwelling.

Such a design should:

* be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;

* reflect the highest standards in architecture;

* significantly enhance its immediate setting; and
* be sensitive to the defining characteristics of the local area.

Waveney Local Plan First Draft Plan, July 2017

Overall Spatial Strategy

Vision

Rural Areas

Through allowing more growth than in recent years, settlements in the rural areas will become more sustainable and more vibrant. Through the provision of a wide range of types and tenures of housing, new homes will be more affordable in the rural areas, allowing people with a local connection or those who work in the rural areas to live in the rural areas. New housing will also help support existing services and facilities in the rural areas such as small rural schools and pubs. New development in rural villages will have increased the coverage of high-speed broadband.

Objectives

* To improve health, wellbeing and education opportunities for the population.
* To meet the housing requirements of the whole community (both urban and rural) including those wishing to move into the area.
* To enhance and protect the natural and built environment.
* To reduce contributions to climate change and mitigate the effects and conserve natural resources.
* To achieve sustained and resilient economic growth in towns and rural areas.
* To enhance the viability and vitality of town centres and service provision in villages.
* To significantly improve the quality of urban design across the District.
* To improve the quality and provision of all types of infrastructure.

Policy WLP1.1 – Scale and Location of Growth

In the period 2014 to 2036, the Council will:

* Make provision for the delivery of a minimum 8,223 dwellings in
Waveney.

* Maximise opportunities for economic growth, with the aim of achieving a minimum of 5,000 additional jobs in Waveney. To deliver this, make provision for:

* 43ha of employment land for B1/B2/B8 uses.

* 2,200m² (net) of convenience (food) and 11,000m² (net) of comparison (non-food) retail floorspace.

In order to sustainably deliver the growth targets set out above, new residential development will be distributed across the District approximately as follows:

* Lowestoft (including Carlton Colville, Oulton, Oulton Broad, and the parts of Gisleham and Corton bordering the built up area) - 55% of housing growth

* Beccles and Worlingham - 15% of housing growth

* Halesworth and Holton - 8% of housing growth

* Bungay - 6% of housing growth

* Southwold and Reydon - 4% of housing growth

* Rural Area - 12% of housing growth (See Policy WLP7.1 for more detail on the distribution across rural villages)

Employment land development will be focused mainly in Lowestoft and Beccles and distributed approximately as follows:

* Lowestoft (including Carlton Colville, Oulton, Oulton Broad, and the parts of Gisleham, Corton bordering the built up area) - 60% of employment land development

* Beccles - 25% of employment land development

* Other Market Towns and Rural Areas - 15% of employment land development

60-70% of retail and leisure development will be focused in Lowestoft Town Centre as the District’s main town centre. Beccles as the next largest town should accommodate approximately 15% of retail and leisure development. The remaining proportion of development should come from the other Market Towns commensurate with the level of housing and employment
Provision has been made in this Local Plan through site allocations and policies to deliver this scale and strategic distribution of growth. Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.

Policy WLP1.2 - Presumption in Favour of Sustainable Development

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved wherever possible without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, planning permission will be granted unless:

* The proposal would undermine the achievement of the vision and objectives set out in this Local Plan;

* The adverse effects of doing so would significantly and demonstrably outweigh the benefits, when assessed against national planning policy; or

* Specific national planning policies indicate that development should be restricted.

Policy WLP1.3 - Settlement Boundaries

Settlement boundaries are defined on the Policies Map. Land which is outside of settlement boundaries and allocations in the Local Plan and Neighbourhood Plans is considered as the Countryside.

New residential, employment and town centre development will not be permitted in the Countryside except where specific Policies in this Local Plan indicate otherwise.

Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other Policies of this Local Plan.

Neighbourhood Development Orders can permit development outside of settlement boundaries providing that the overall distribution strategy outlined in Policy WLP1.1 is not undermined and the development would
not be contrary to the other Policies of this Local Plan.

Policy WLP8.6 – Affordable Housing in the Countryside

Proposals for the development of affordable housing in the Countryside will be permitted where:

* It is demonstrated there is an identified local need for affordable housing and this cannot be met through existing housing allocations in the Local Plan or relevant Neighbourhood Plan;

* The scheme is adjacent to a Larger Village, a Smaller Village or another hamlet or community within the Countryside;

* The scheme incorporates a range of dwelling sizes, types and tenures appropriate to the identified local need;

* The location, scale and design standard of a scheme will retain or enhance the character and setting of the settlement.

A limited amount of market housing will be permitted as part of affordable housing developments in the Countryside where it is required to cross-subsidise the affordable housing. Where market housing is to be provided on site this will be subsidiary to the affordable housing element of the proposal and the amount of market housing required will need to be demonstrated through a viability assessment. The amount of market housing on the site should be no more than one third of dwellings on the site.

Where exception sites are brought forward with an element of market housing, both housing tenures should be built to the same design standards which contribute towards the character of the area. Market housing should be reflective of the size of the affordable dwellings proposed on the site.

Policy WLP8.7 – Small Scale Residential Development in the Countryside

Small scale residential development in the Countryside of up to three dwellings will be permitted where:

* The site constitutes a clearly identifiable gap within a built up area of a settlement within the Countryside;

* There are existing residential properties on three sides of the site; and

* The development does not extend further into the undeveloped Countryside than the existing extent of the built up area surrounding the
Small scale residential development in the Countryside of up to and including five dwellings will also be permitted where:

* There is clear and demonstrable local support;

* The scheme demonstrates meaningful and robust consultation with the Parish Council, local community and other stakeholders;

* Following consultation, it can be demonstrated that any planning impacts identified by the local community have been fully addressed and therefore the scheme is supported by the community;

* The site is adjacent or within the built-up area of the settlement within the Countryside; and

* The scheme when considered cumulatively with other developments in the Countryside would not result in a level of development which would be contrary to the strategy outlined in Policies WLP1.1 and WLP7.1

For all small scale development in the Countryside the design of the scheme will need to respect and reflect the character of the settlement and existing built up frontage including:

* Housing density is reflective of the density in the village and surrounding built up area; and

* The ratio of the building footprint to the plot area is consistent with existing properties nearby which characterise the village.

Planning issues

The National Planning Policy Framework (NPPF) requires that local authorities should maintain a five-year land supply for housing. Waveney District Council in the last published figures (September 2016) demonstrated that as at 31 March 2016 there was a 123 shortfall in housing provision.

The Analysis of the ‘Options for the new Waveney Local Plan’ (July 2017) has dismissed two potential development sites around Redisham - Site 19 - Halesworth Road, Redisham and Site 157 - West of Redisham Road, Brampton on the grounds that ‘The site(s are) not located within or adjacent to a larger or smaller village in the rural area. The site (are) not considered suitable for allocation as part of this Local Plan.’ Redisham does not have local facilities – shop, school public house or meeting place but
villages, such as Redisham without their own community facilities, support nearby villages as is acknowledged in the National Planning Policy Framework (NPPF).

The site is located between two existing properties, Elm House and Rose Villas and would infill the gap between them which Waveney Local Plan Policy WLP8.7 proposes could be an acceptable location subject to public support.

Redisham has only seen very modest growth between 2001-2013 with only 5 new properties being built. Whilst the village may not be considered 'sustainable' all villages will retain a need for new housing, particularly affordable housing to ensure that local people can stay close to family, employment, etc.

Access and Highways

The site has good visibility in both directions commensurate with a national speed limit road. The road is used by the regular bus service that runs between Beccles and Halesworth (Anglian Bus – 60H). There is no opportunity for a pedestrian route to the main part of the village but as the NPPF acknowledges it is necessary to accept car use in rural areas.

The Development

Opportunities

* Modest residential development (4 units) infilling the gap between two existing properties - the properties could be affordable rather than market houses. Affordable housing would enable local people to stay closer to family and employment, and would support community facilities in nearby villages – shops and schools.

* Windfall site – the site would provide a windfall site to contribute to overcoming the council's shortfall in five-year land supply.

* Impact on heritage assets – the two sites in Redisham previously considered under the local plan could have impacted on adjacent Listed buildings, the proposed site does not affect any heritage assets.

* Low grade agricultural land – the site is likely to be classified as Grade 3b agricultural land and is currently used as pasture and, therefore, development on the site would not result in the loss of good quality agricultural land, in accordance with the guidance in the NPPF.

* Ecological impact – the loss of a small strip of pasture would have minimal
impact on the local ecology and the retention of the existing mature hedgerows with their high ecological value would minimise the visual impact on the local environs.

* Public Transport – development of the site would help support the existing bus service.

Constraints

* Planning – the two other sites considered in Redisham were not considered for allocation as they were not located in a 'Small' or 'Large' village as classified in the Local Plan

* Lack of local facilities – Redisham does not have any community facilities, therefore, the residents of the development would need to travel for these.

Proposal

The site described above is commended for consideration within the current Local Plan review for allocation as a residential development site for the reasons set out above in reference to the sites previously considered in Redisham (Sites 19 and 157).

Attached documents


We have been working with Clients in this area and feel a more sympathetic approach would be to allow up to say 10 No. dwellings within the remote village locations, but to more villages than currently proposed. This no doubt would have a lesser impact on both services, infrastructure and the inhabitants by diluting the effect of the major intrusions currently proposed and should be considered as "small scale residential development in the countryside."

It would also offer local people housing within their local area, thereby attempting to keep people and services within the villages.

The reason for suggesting this is that I have a particular case at present which is very typical of cases we receive. I attach the details which we would ask to be considered as part of the new Local Plan. It refers to a site in Spexhall where a Client already has Permission for three properties under a Permitted Development Application file reference DC/16/4723/PN3. On the site there are further dilapidated agricultural buildings that you will see my Client has been trying to let on a commercial basis (please see Clark & Simpson's attached letter).

The site location is as shown on the attached plan and map, and you can clearly see that it is well within the radius of the other villages proposed within the Halesworth area, and therefore could absorb some of the dwelling numbers being proposed for Halesworth.

We have consulted with Spexhall Parish Council, and they are generally in support of further dwellings within the village and have suggested that we should submit our proposal for inclusion within the Local Plan. They have also intimated that thereafter they would look favourably at the project through the planning process. In principle the parish council agrees with some more housing in the village.

As a local employer and knowing the need for additional housing in the
area, I trust you will review this case along with no doubt others that are to be considered, and try within the new Local Plan to spread the requirements for housing across the local area and not over populate Halesworth.

I would be grateful for an acknowledgement of receipt of this letter and consideration of this proposal into the local plan.

Tim and Janey Sheldon

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| Comment | Following our recent successful application in December 2016, file reference DC/16/4723/PN3 confirming permitted development approval to one of the vacant agricultural buildings at Spexhall Hall, we have requested pre-application advice, file DC/PREAPP/17/0978 in connection with improving adjoining vacant agricultural buildings. We now wish to ask for the site to be considered as part of the new Local Plan.

We have recently attended local exhibitions on 8, 10 and 15 August and 14 September re the first draft WDC Local Plan. We are aware that the 'strategy for Halesworth and surrounding rural areas' targets additional housing. The figures are;

- 440 homes for Halesworth,
- 12 homes for Rumburgh,
- 25 homes for Ilketshall St Lawrence
- 14 homes for Westall and
- 50 homes for Brampton

541 TOTAL

Spexhall sits right in the middle of this area, see map, and therefore represents a logical and inevitable location for some additional homes in the local plan. In order to lift the whole area of the Spexhall Hall site, we recommend that it would be appropriate to demolish the barn adjoining the permitted development approval to allow for the addition of quality new build properties and also to allow for the refurbishment of the remaining brick property for conversion into residential.

Linked to what has already been approved as permitted development, this would further enhance the site as a whole and provide a small, attractive community of quality housing, in line with the 'draft local plan strategy for
rural areas’. Providing good housing within this site presents a far more appealing and interesting proposition than what currently exists.

We have consulted with Spexhall Parish Council and they are generally in support of the proposal for inclusion of our site within the local plan.

WE HOPE THAT YOU ARE ABLE TO CONFIRM THAT THE PROPOSED SITE AT SPEXHALL HALL WILL BE CONSIDERED FOR INCLUSION WITHIN THE LOCAL PLAN.

Attached documents


http://consult.waveney.gov.uk/gf2.ti/af/799778/135167/PDF/-/8689237%20201%202