Consultation Statement for the Waveney Local Plan

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1. Introduction

This document provides a summary of the consultation undertaken on the Waveney Local Plan. It provides the information required under Regulation 22(c) of the Town and County Planning (Local Planning) Regulations 2012. The document sets out:

- Which bodies and persons were invited to make representations under Regulation 18 of Town and County Planning (Local Planning) Regulations 2012.
- How those bodies were invited to make representations.
- A summary of the main issues raised in those representation received.
- How those representations have been taken into account.
- The number of representation made pursuant to Regulation 20 of the Town and County Planning (Local Planning) Regulations 2012 and a summary of the main issues raised.

The consultation on the ‘Options for the new Waveney Local Plan’ marked the first stage of consultation on the new Local Plan under Regulation 18 and invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. An eight week consultation took place between 22 April and 17 June 2016. In total 525 individuals and organisations responded to the consultation. Between them they made 3,428 comments. 2,210 of these comments were made on the questions in consultation document. The other 1,218 comments were made on the potential sites for development which were also part of the consultation.

The ‘First Draft Local Plan’ consultation under Regulation 18 invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. An 8 week consultation took place between 28 July and 22 June 2017. In total 683 individuals and organisations responded to the consultation. Between them they made 1,947 comments. 1,713 of these comments were made on First Draft Local Plan consultation document. The other 234 comments were made on the alternative sites considered which were also part of the consultation.

The ‘Final Draft Local Plan’ was published under Regulation 19 and again invited comments from statutory local plan consultees, parish and town councils, other local and national organisations with an interest in planning and development, local and national landowners and developers and members of the public. An 8 week period began on the 29th March 2018 lasting until the 24th May 2018 to receive representations on the soundness of the plan. In total 188 individuals and organisations made 950 representations between them.
2. Regulation 18 - Who was Consulted (Regulation 22(c)(i))

Options for the new Waveney Local Plan and the First Draft Local Plan consultations

<table>
<thead>
<tr>
<th>Specific consultation bodies</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Coal Authority</td>
</tr>
<tr>
<td>Environment Agency</td>
</tr>
<tr>
<td>Historic England</td>
</tr>
<tr>
<td>Marine Management Organisation</td>
</tr>
<tr>
<td>Natural England</td>
</tr>
<tr>
<td>Network Rail</td>
</tr>
<tr>
<td>Highways Agency</td>
</tr>
<tr>
<td>Norfolk County Council</td>
</tr>
<tr>
<td>Suffolk County Council</td>
</tr>
<tr>
<td>Parish and Town Councils within and adjoining the Waveney District</td>
</tr>
<tr>
<td>Suffolk Constabulary and Norfolk Constabulary</td>
</tr>
<tr>
<td>Adjoining local planning authorities - The Broads Authority, Mid Suffolk District Council, Suffolk Coastal District Council, South Norfolk District Council, Great Yarmouth Borough Council</td>
</tr>
<tr>
<td>NHS England and HealthEast (NHS Great Yarmouth and Waveney Clinical Commissioning Group)</td>
</tr>
<tr>
<td>Anglian Water</td>
</tr>
<tr>
<td>Essex and Suffolk Water</td>
</tr>
<tr>
<td>Homes and Communities Agency</td>
</tr>
<tr>
<td>Electronic communication companies who own or control apparatus in the Waveney District</td>
</tr>
<tr>
<td>Relevant gas and electricity companies</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>General consultation bodies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Voluntary bodies some or all of whose activities benefit any part of the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of different racial, ethnic or national groups in the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of different religious groups in the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of disabled persons in the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of persons carrying on business in the District</td>
</tr>
</tbody>
</table>

Examples include:
- Abeillo Greater Anglia Ltd
- Active Waveney Sports Partnership
- Associated British Ports
- Beccles Society
- Bungay Society
- Community Action Suffolk
- DIAL Lowestoft and Waveney
- Fields in Trust
- Halesworth and Blyth Valley Partnership
- Home Builders Federation
Lowestoft and Waveney Chamber of Commerce
Lowestoft Civic Society
Kirkely Business Association
Southwold and Reydon Society
Sport England
Suffolk Fire and Rescue Service
Suffolk Preservation Society
Suffolk Wildlife Trust
Sustrans
Theatres Trust
The Woodland Trust

**Other individuals and organisations**
Includes individuals, local organisations and groups, planning agents, developers and others on the Local Plan mailing list.
3. Regulation 18 - How they were consulted (Regulation 22(c)(ii))

Public exhibitions

Options for the new Waveney Local Plan (2016)

<table>
<thead>
<tr>
<th>Location</th>
<th>Date/time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beccles - Public Hall</td>
<td>Wednesday 4 May 5-7.30pm</td>
</tr>
<tr>
<td>Lowestoft - shop unit, Britten Centre</td>
<td>Saturday 7 May 9am-5pm</td>
</tr>
<tr>
<td>Reydon - Village Hall</td>
<td>Tuesday 10 May 5.30-7.30pm</td>
</tr>
<tr>
<td>Halesworth - Library</td>
<td>Wednesday 11 May 10am-12.30pm</td>
</tr>
<tr>
<td>Lowestoft - Riverside</td>
<td>Thursday 12 May 6pm-7.30pm</td>
</tr>
<tr>
<td>Halesworth - Rifle Hall</td>
<td>Tuesday 17 May 5.30-7.30pm</td>
</tr>
<tr>
<td>Bungay - Fisher Theatre (The Gallery)</td>
<td>Wednesday 18 May 5.30-7.30pm</td>
</tr>
</tbody>
</table>

First Draft Local Plan (2017)

<table>
<thead>
<tr>
<th>Location</th>
<th>Date/time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beccles - Public Hall</td>
<td>Tuesday 8 August 5.30-7.30pm</td>
</tr>
<tr>
<td>Halesworth - Rifle Hall</td>
<td>Thursday 10 August 5.30-7.30pm</td>
</tr>
<tr>
<td>Bungay - Fisher Theatre (The Gallery)</td>
<td>Tuesday 15 August 5.30-7.30pm</td>
</tr>
<tr>
<td>Lowestoft - Riverside</td>
<td>Wednesday 16 August 6pm-8pm</td>
</tr>
<tr>
<td>Reydon - Village Hall</td>
<td>Monday 21 August 5.30-7.30pm</td>
</tr>
<tr>
<td>Lowestoft - Library</td>
<td>Saturday 2 September 9.30am-1pm</td>
</tr>
<tr>
<td>Beccles - Library</td>
<td>Tuesday 5 September 9.30am-12.30pm</td>
</tr>
</tbody>
</table>

An exhibition board was placed in local libraries on rotation during the consultation. The board included an A1 poster advertising the Local Plan consultation (targeted to the locality), and magazine holders contained copies of the tabloid leaflet and inspection copies of the Local Plan.

Town centres street leafleting

Options for the new Waveney Local Plan (2016)

Planning Officers handed out flyers to the public, shops, cafes, businesses etc.

<table>
<thead>
<tr>
<th>Location</th>
<th>Date/time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beccles town centre</td>
<td>Friday 29 April 10am-12.30pm</td>
</tr>
<tr>
<td>Lowestoft town centre</td>
<td>Saturday 7 May 10am onwards</td>
</tr>
<tr>
<td>Halesworth town centre</td>
<td>Wednesday 11 May 10am-12.30pm</td>
</tr>
</tbody>
</table>
Presentations, meetings and workshops

Events organised by the Council or to which Planning Policy Officers attended upon request.

Options for the new Waveney Local Plan (2016)

<table>
<thead>
<tr>
<th>Audience</th>
<th>Date/time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waveney Town and Parish Councils</td>
<td>Thursday 5 May 6pm (Riverside)</td>
</tr>
<tr>
<td>Waveney Developer Forum</td>
<td>Thursday 12 May 6pm (Riverside)</td>
</tr>
<tr>
<td>Clinical Commissioning Group Infrastructure Meeting</td>
<td>Wednesday 18 May 1pm (Beccles House)</td>
</tr>
<tr>
<td>Oulton Parish Council Meeting</td>
<td>Tuesday 31 May 6.30pm (Oulton Community Centre)</td>
</tr>
<tr>
<td>Lowestoft and Waveney Chamber of Commerce Board</td>
<td>Monday 6 June 2pm (Waveney Chambers)</td>
</tr>
<tr>
<td>Sir John Leman High School</td>
<td>Wednesday 8 June 3.15pm (Sir John Leman HS)</td>
</tr>
<tr>
<td>Southwold Town Council and Reydon Parish Council (joint meeting)</td>
<td>Thursday 9 June 7pm (Reydon Village Hall)</td>
</tr>
<tr>
<td>Lowestoft Sixth Form College</td>
<td>Wednesday 29 June 8.30am (LSFC)</td>
</tr>
</tbody>
</table>

First Draft Local Plan (2017)

<table>
<thead>
<tr>
<th>Audience</th>
<th>Date/time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waveney Town and Parish Councils</td>
<td>Thursday 27 July 5.30pm (Riverside)</td>
</tr>
<tr>
<td>Waveney Developer Forum</td>
<td>Wednesday 30 August 8.30am (Riverside)</td>
</tr>
<tr>
<td>Parish Council 1-2-1s:*</td>
<td>Monday 7 August 1.30pm (Riverside)</td>
</tr>
<tr>
<td>- Brampton with Stoven</td>
<td>Wednesday 9 August 10am (Riverside)</td>
</tr>
<tr>
<td>- Carlton Colville</td>
<td>Friday 18 August 11am (Riverside)</td>
</tr>
<tr>
<td>- Reydon</td>
<td>Tuesday 22 August 6pm (Riverside)</td>
</tr>
<tr>
<td>- Ringsfield and Weston</td>
<td>Friday 8 September 3pm (Riverside)</td>
</tr>
<tr>
<td>- Southwold</td>
<td>Wednesday 20 September 5pm (Riverside)</td>
</tr>
<tr>
<td>- Worlingham</td>
<td>Tuesday 29 August 7pm (Beccles)</td>
</tr>
<tr>
<td>Beccles Town Council Meeting</td>
<td>Friday 18 August 2pm (Riverside)</td>
</tr>
<tr>
<td>Lowestoft Town Council (Planning Committee)</td>
<td>Friday 4 September 2pm (Oulton Broad)</td>
</tr>
<tr>
<td>Oulton Broad Parish Council Meeting</td>
<td>Thursday 14 September 7pm (Halesworth)</td>
</tr>
<tr>
<td>Halesworth Town Council (Halesworth Forum)</td>
<td></td>
</tr>
</tbody>
</table>

* all town and parish councils were offered the opportunity to attend a 1-2-1 session with planning officers to discuss the Local Plan.
Media and publicity

Options for the new Waveney Local Plan (2016)

- Media briefing held at the Council’s Riverside office, Tuesday 19 April.
- Council press release “Views sought on future plans for district” issued Friday 22 April.
- Council press release “We need more views from Lowestoft” issued Tuesday 24 May.

<table>
<thead>
<tr>
<th>Media</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>22 April</td>
<td></td>
</tr>
<tr>
<td>Lowestoft Journal</td>
<td>“House building rate to double” front page, full story on pages 6-7</td>
</tr>
<tr>
<td>Eastern Daily Press</td>
<td>“Have you say on new homes” page 24</td>
</tr>
<tr>
<td>29 April</td>
<td></td>
</tr>
<tr>
<td>Beccles &amp; Bungay Journal</td>
<td>“Have your say at exhibitions on our area’s future growth” pages 10-11</td>
</tr>
<tr>
<td>7 May</td>
<td></td>
</tr>
<tr>
<td>Beach Radio</td>
<td>News item promoting (today’s) public exhibition in Lowestoft town centre</td>
</tr>
<tr>
<td>20 May</td>
<td></td>
</tr>
<tr>
<td>Beccles Independent</td>
<td>Paid for advert “How many new homes should be built in Beccles and Worlingham over the next 20 years?” page 11</td>
</tr>
<tr>
<td>Bungay &amp; Harleston Community News</td>
<td>Paid for advert “How many new homes should be built in Bungay over the next 20 years?” page 11</td>
</tr>
<tr>
<td>Lowestoft Journal</td>
<td>Notice of Oulton Parish meeting on 13 June to discuss the new Waveney Local Plan at which Council officers will be in attendance, page 53</td>
</tr>
<tr>
<td>Twitter feed (Access Community Trust)</td>
<td>@accessEmma Want to know more about the waveneydc new local plan? Visit @LowestoftRising community noticeboard @samscafeeast (re-tweeted by @SBakerCX)</td>
</tr>
<tr>
<td>24 May</td>
<td></td>
</tr>
<tr>
<td>Twitter feed (Beach Radio)</td>
<td>#BeachNews Where should 4,000 homes be built in Lowestoft? Should the A12 &amp; A146 be linked?</td>
</tr>
<tr>
<td>26 May</td>
<td></td>
</tr>
<tr>
<td>Lowestoft Journal (The Journal online)</td>
<td>“Where will new homes go in Waveney?”</td>
</tr>
<tr>
<td>27 May</td>
<td></td>
</tr>
<tr>
<td>Waveney Advertiser</td>
<td>Paid for advert “How many new homes and where?” page 37</td>
</tr>
<tr>
<td>Lowestoft Journal</td>
<td>“Call for more people to have say on area’s future housing growth”, page 20 and editorial comment,</td>
</tr>
</tbody>
</table>
During the consultation period, a number of town and parish councils included information about the new Local Plan/Options consultation on their websites e.g. Carlton Colville Town Council, Southwold Town Council, Ashby, Herringfleet and Somerleyton Parish Council, Wissett Parish Council and Wrentham Parish Council.

**First Draft Local Plan (2017)**

- Media briefing held at the Council’s Riverside office, Monday 17 July.

<table>
<thead>
<tr>
<th>Media</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>28 July</strong></td>
<td></td>
</tr>
<tr>
<td>Lowestoft Journal</td>
<td>“Help shape the future of our towns and villages” pages 2-3</td>
</tr>
<tr>
<td>Beccles and Bungay Journal</td>
<td>“Help shape the town’s future” front page and full report pages 2-3</td>
</tr>
<tr>
<td><strong>4 August</strong></td>
<td></td>
</tr>
<tr>
<td>Waveney Advertiser</td>
<td>“Waveney plan: your first draft” front cover signposting enclosed 12-page leaflet “Future of our towns, villages and countryside”</td>
</tr>
<tr>
<td><strong>11 August</strong></td>
<td></td>
</tr>
<tr>
<td>Beccles and Bungay Journal</td>
<td>“Residents respond to Waveney development plan at first public exhibition in Beccles” page 4</td>
</tr>
<tr>
<td><strong>18 August</strong></td>
<td></td>
</tr>
<tr>
<td>Beccles and Bungay Journal</td>
<td>“Councillors form group with residents aiming to share their town’s future” [Halesworth] page 20; “Waveney Plan could spell death of village, parish council claims” [Worlingham] page 22; “Infrastructure will not cope” and “Major urges...”</td>
</tr>
<tr>
<td>Date</td>
<td>Source</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------------------------------</td>
</tr>
</tbody>
</table>
| June 2018  | Consultation Statement                      | page 35, letters
|            | www.eastsuffolk.gov.uk/newwaveneylocalplan  | “Waveney Plan could spell death of village, parish council claims” [Worlingham] |
| 23 August  | Beccles and Bungay Journal online          | “People react in Lowestoft to Local Plan set to shape future of the town” |
| 25 August  | Lowestoft Journal online                    | “Town reacts to first draft on council’s Local Plan” page 6          |
| 29 August  | Lowestoft Journal                           | “Meeting called for Beccles and Worlingham residents following concerns over housing plans” |
| 8 September| Beccles and Bungay Journal online          | “We don’t want these homes” and “Why won’t they listen to us?” page 21, letters |
| 11 September| Facebook, area based (paid for) advertising | Lowestoft: Draft plans for Lowestoft include approximately 5,000 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Beccles: Draft plans for Beccles and Worlingham include approximately 1,500 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Bungay: Draft plans for Bungay include over 500 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Halesworth: Draft plans for Halesworth and Holton include over 700 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. Southwold: Draft plans for Southwold and Reydon include over 300 new homes to 2036. Find out more about the plans, view the preferred locations for new development and have your say. |
| 15 September| Beccles and Bungay Journal                 | “Final chance to have say on Waveney’s future” page 12; “We must fight development” page 29, letters |
| 22 September| Lowestoft Journal                           | “Plans piecemeal proposals only” page 46, letters                   |
During the consultation period, a number of town and parish councils included information about the First Draft consultation on their websites/social media and parish noticeboards e.g. Ashby, Somerleyton and Herringfleet Parish Council, Brampton with Stoven Parish Council, Carlton Colville Town Council, Halesworth Town Council, Lound Parish Council, Oulton Parish Council, Rumburgh Parish Council, Worlingham Parish Council and Wrentham Parish Council.

## Consultation and publicity materials

### Options for the new Waveney Local Plan (2016)

<table>
<thead>
<tr>
<th>Materials</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Options document “Help plan our future, options for the new Waveney Local Plan”</td>
<td>PDF version on website Consultation portal version on website Hardcopies provided to Town and Parish Councils Copies available at Council offices, libraries, exhibitions</td>
</tr>
<tr>
<td>Key Questions leaflet “Help plan our future, options for the new Waveney Local Plan”</td>
<td>Copies available at Council offices, libraries, exhibitions</td>
</tr>
<tr>
<td>Comments Form</td>
<td>Available as part of the exhibitions</td>
</tr>
<tr>
<td>Consultation poster included exhibition details</td>
<td>Hardcopies provided to Council offices, libraries, Town and Parish Councils, GP surgeries/health centres, dental surgeries, post offices, schools/educational establishments, large employers, main supermarkets, youth clubs, sports centres</td>
</tr>
<tr>
<td>Sites consultation poster “What will Waveney look like in 2036?”</td>
<td>Hardcopies provided to Town and Parish Councils specifically identifying sites within their area included within the Options document</td>
</tr>
<tr>
<td>A6 Flyer “What will the Waveney District look like in 2036?”</td>
<td>Distributed to the public, shops, cafes, businesses in Beccles, Halesworth and Lowestoft town centres</td>
</tr>
<tr>
<td>Consultation letters newsletter format for email contacts, letter format</td>
<td>Sent to those on the Local Plan mailing list comprising specific consultation bodies, general</td>
</tr>
</tbody>
</table>

**Notes:**
- Helvetica regular font for main text.
- Helvetica bold font for table headers.
- Helvetica italic font for specific emphasis within tables.
### First Draft Local Plan (2017)

<table>
<thead>
<tr>
<th>Materials</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waveney Local Plan, First Draft Plan and Appendices</td>
<td>PDF version on website</td>
</tr>
<tr>
<td>Policies Map</td>
<td>Consultation portal version on website</td>
</tr>
<tr>
<td></td>
<td>Copy provided to Town and Parish Councils</td>
</tr>
<tr>
<td></td>
<td>Inspection copies available at Marina Customer Service Centre, libraries, exhibitions</td>
</tr>
<tr>
<td>“Future of our towns, villages and countryside” 12-page tabloid leaflet</td>
<td>40,500 inserted at press and distributed with the Waveney Advertiser 4 August (delivered free to households in [part] Waveney)</td>
</tr>
<tr>
<td>43,000 print run</td>
<td>2,500 copies provided to Town and Parish Councils, libraries, exhibitions etc</td>
</tr>
<tr>
<td></td>
<td>Digital edition was placed on the Lowestoft Journal website for two weeks (minimum)</td>
</tr>
<tr>
<td>Comments Form</td>
<td>Available at the exhibitions</td>
</tr>
<tr>
<td>Site notices</td>
<td>Site notices placed on boundary/vicinity of each preferred site</td>
</tr>
<tr>
<td></td>
<td>Copy provided to town/parish council as relevant to their area</td>
</tr>
<tr>
<td>Story map summary</td>
<td>Interactive summary of the Local Plan on website</td>
</tr>
<tr>
<td>Consultation poster “Have your say on future plans for the area” included exhibition details</td>
<td>Copies provided to Town/Parish Councils and Marina Customer Service Centre, libraries, GP surgeries/health centres, dental surgeries, post offices, large employers, youth clubs, sports centres</td>
</tr>
<tr>
<td>Sites consultation poster “What will Waveney look like in 2036?”</td>
<td>Hardcopies provided to Town and Parish Councils specifically identifying sites within their area included within the Options document</td>
</tr>
<tr>
<td>Consultation letters newsletter format for email contacts, letter format for postal contacts</td>
<td>Sent to those on the Local Plan mailing list comprising specific consultation bodies, general consultation bodies, other organisations and individuals and landowners/agents of preferred sites and those sites not being taken forward</td>
</tr>
<tr>
<td>letter sent at consultation start and reminder (email only) sent mid-consultation reminder</td>
<td></td>
</tr>
<tr>
<td>Paid for Facebook advertising</td>
<td>5 adverts targeted to different parts of the district</td>
</tr>
<tr>
<td>Method</td>
<td>Details</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>WDC twitter feeds</td>
<td>Various news feeds throughout the consultation including reminder about public exhibitions</td>
</tr>
<tr>
<td>Marina Customer Service Centre TV screen</td>
<td>Presentation publicising the First Draft consultation</td>
</tr>
</tbody>
</table>
4. Main Issues raised during Regulation 18 and how they were taken into account (Regulation 22(c)(iii and iv)).

As detailed above, two consultations were undertaken under Regulation 18. The comments received during the Options for the new Waveney Local Plan (April, 2016) Consultation are summarised in Appendix 1. Appendix 1 also details how the Council took these comments into account during the preparation of the second Regulation 18 consultation, the First Draft Local Plan (July, 2017). A summary of the comments received during the First Draft Local Plan (July, 2017) consultation is found in Appendix 2 together with details on how the Council took these comments into account in preparing the Regulation 19 proposed submission version of the Local Plan, the Final Draft Local Plan (March 2018).

5. Main Issues in Representations made under Regulation 20(Regulation 22 (c)(v))

An eight week consultation for the submission of representations was held between 29th March and 24th May 2018. This final consultation prior to the submission for examination invited representations on soundness and legal compliance. Appendix 3 details who was consulted and how they were consulted at this stage.

In total, 188 individuals and organisations responded to the consultation, making 950 representations.

The following sections detail the main issues raised under each part of the Local Plan.

**Legal Compliance, Introduction and General Comments**

**Legal Compliance**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
</table>
| **Main Issue 1:** Concern was raised that the Council had not effectively consulted or engaged with local communities. | Carlton Colville Town Council (Alison Ayers)(Rep ID:611)  
M and R Shiers (Rep ID:804)  
Mrs Boyd (Rep ID:23)  
Halesworth Town Council (Rep ID: 945)  
Mr S Clack (Rep ID:655)  
Reydon Action Group for the Environment (Stephen Chessher) (Rep ID:729) |
### Duty to Co-operate

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Great Yarmouth Borough Council confirmed that they were satisfied that Waveney District Council had satisfied the Duty to Cooperate as far as Great Yarmouth is concerned.</td>
<td>Great Yarmouth Borough Council (Kim Balls)(Rep ID: 484)</td>
</tr>
</tbody>
</table>

### Neighbourhood Plans

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that it was unreasonable for all of the Local Plan policies to be considered strategic given the fine level of detail covered in the policies.</td>
<td>Lowestoft Town Council (Shona Bendix))(Rep ID: 835)</td>
</tr>
</tbody>
</table>

### General Comments

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested there should be a policy on enabling development in the Local Plan.</td>
<td>Reydon Action Group for the Environment (Stephen Chessher)(Rep ID:738)</td>
</tr>
</tbody>
</table>
Waveney Context

District-Wide Key Issues

No Main Issues

Settlement Specific Key Issues

No Main Issues

Overall Spatial Strategy

Vision and Objectives

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the vision for Lowestoft should include regenerating derelict areas for employment development.</td>
<td>Mr Houghton (Rep ID: 33)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was raised that the objectives were unbalanced towards housing.</td>
<td>Mr Houghton (Rep ID: 34)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that the ambitions for growth were outdated and unsustainable</td>
<td>Mr Castleton (Rep ID:211)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was stated that an additional strategic priority/objective should be added to conserve and enhance the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.</td>
<td>Suffolk County Council (AONB Team) (Rep ID: 353)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was considered that the Vision and Objectives were over-optimistic and undeliverable and that the plan should be put on hold and reviewed in a years time.</td>
<td>Mr Rogers (Rep ID:524)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was suggested that the vision for Bungay should refer to the need for retail development should suitable sites not come forward elsewhere.</td>
<td>Mr Basey-Fisher(John Long Planning) (Rep ID:596)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was stated that the vision could be more ambitious with respect realising the potential of Lowestoft.</td>
<td>Lowestoft Town Council (Rep ID:836)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was suggested that the strategic priorities could be made more specific by making</td>
<td>Lowestoft Town Council (Rep ID:837)</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>reference to realising the potential of the coast and waterfront.</td>
<td></td>
</tr>
</tbody>
</table>

**Policy WLP1.1 – Scale and Location of Growth**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that insufficient use of brownfield development opportunities has been made in the Local Plan and that the development of greenfield allocations could result in brownfield sites not being developed.</td>
<td>Mr R Gill (Rep ID:122), Ms Clutten (Rep ID:459)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the plan needs more analysis of infrastructure and traffic challenges.</td>
<td>Mr R Gill (Rep ID:246)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was argued that reduction of the allocation of housing towards the rural areas from 12% in the First Draft Local Plan to 10% in the Final Draft Local Plan was not justified, contrary to national planning policy and ineffective.</td>
<td>Sotterley Estate (Evolution Town Planning)(Rep ID:332) Somerleyton Estate (Evolution Town Planning)(Rep ID:677)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was argued that it was ineffective and contrary to national planning policy to allocate as much as 10% to the rural areas. It was suggested that the proportion to these areas should be reduced and the amount of development allocated to Halesworth, Bungay, Southwold and Reydon increased.</td>
<td>Hopkins Homes (Armstrong Rigg Planning)(Rep ID:351) Hopkins Homes (Armstrong Rigg Planning)(Rep ID:809) Hopkins Homes (Armstrong Rigg Planning)(Rep ID:810)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concern was raised that the plan does not allocate enough housing and of sufficient mix and spatial distribution to ensure needs are met. There was concern that there was an over-reliance on large sites.</td>
<td>Durrant’s (Christopher Hobson) (Rep ID:666) Gladman Developments Limited (Richard Crosthwaite)(Rep ID:781) Halsbury Homes Ltd (Pegasus Group, Louise Follett) (Rep ID: 808) Home Builders Federation (Mark Behrendt) (Rep ID:811) Warnes &amp; Sons LTD (Wheatman Planning Ltd.)(RepID:360)</td>
</tr>
</tbody>
</table>

It was suggested that more sites, or reserve sites should be allocated.

These included:

- Site 145, The Bull Field, Ringsfield Lane, Beccles.
- Land between Pilgrams Way and
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wingfield Street, Bungay  • Hall Road in Carlton Colville</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was suggested that over-allocation to enable more affordable homes was open to question and whether it would achieve its objective.</td>
<td>Ms Clutten (Rep ID:459) Carlton Colville Town Council (Alison Ayers) (Rep ID:610) Reydon Action Group for the Environment (Stephen Chessher) (Rep ID:726)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was suggested that the policy should be amended to acknowledge that Bungay could be considered a suitable location for retail development in the event that suitable sites do not come forward in other areas.</td>
<td>Mr Basey-Fisher (John Long Planning) (Rep ID:597)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> Concerns were raised over the level of development in Beccles and the impact on infrastructure and traffic. Concerns were raised about the cumulative impact from developments in nearby settlements.</td>
<td>Mr Sayer (Rep ID:636)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> It was suggested that a greater amount of development should be allocated to Beccles.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Limited) (Rep ID:928)</td>
</tr>
<tr>
<td><strong>Main Issue 10:</strong> Concerns were raised about the amount of housing allocated to Lowestoft and the impact on traffic, society, and the economy and its ability to deliver objectively assessed needs. It was suggested it was ineffective and contrary to national planning policy.</td>
<td>Mr Wylson (Rep ID:638) Lowestoft Town Council (Shona Bendix) (Rep ID:638) Hopkins Homes (Armstrong Rigg Planning) (Rep ID:351) Hopkins Homes (Armstrong Rigg Planning) (Rep ID:809) Hopkins Homes (Armstrong Rigg Planning) (Rep ID:810) Home Builders Federation (Mark Behrendt) (Rep ID:811) Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Limited) (Rep ID:928)</td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was stated there was no evidence to support the level of housing distributed to Southwold and Reydon and was too high.</td>
<td>Reydon Action Group for the Environment (Stephen Chessher) (Rep ID:726)</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was suggested that the over-</td>
<td>Gladman Developments Limited (Richard</td>
</tr>
</tbody>
</table>
### Main Issue Representations

**Main Issue 13:** It was suggested that the Strategic Housing Market Assessment was not robust and therefore the objectively assessed need was either too low or too high. Concerns included:

- Housing market area should include Great Yarmouth
- Lack of market adjustment
- Consideration of economic growth
- Timeframe of demographic trends and principle of use of past trends
- Treatment of unattributable population change

<table>
<thead>
<tr>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crosthwaite (Rep ID: 781)</td>
</tr>
<tr>
<td>Home Builders Federation (Mark Behrendt) (Rep ID: 811)</td>
</tr>
<tr>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Limited) (Rep ID: 928); Reydon Action Group for the Environment (Stephen Chessher) (Rep ID: 724); Halesworth Town Council (N Rees) (Rep ID: 946)</td>
</tr>
</tbody>
</table>

### Key Diagram

No main issues identified.

### Policy WLP1.2 – Presumption in Favour of Sustainable Development

<table>
<thead>
<tr>
<th>Main Issue Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that 2nd bullet point of this policy was not in accordance with national policy as it would result in the protection of out-of-date policies by proxy.</td>
</tr>
<tr>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 352)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the policy was unnecessary as it repeated national planning policy and should be deleted.</td>
</tr>
<tr>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited) (Rep ID: 929)</td>
</tr>
</tbody>
</table>

### Policy WLP1.3 – Settlement Boundaries

<table>
<thead>
<tr>
<th>Main Issue Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that land south of Leisure Way should be included in the Settlement Boundary for Lowestoft.</td>
</tr>
<tr>
<td>Frostdrive Ltd. (Lawson Planning Partnership Ltd.) (Rep ID: 341)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the settlement boundary for Wrentham should be amended to link the two defined areas and include land to</td>
</tr>
<tr>
<td>Benacre Company (Savills (UK) Ltd) (Rep ID: 390)</td>
</tr>
<tr>
<td>Main Issue</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>the west of London Road and the adjacent play area.</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that the inclusion of St George’s Square in Reydon in the Settlement Boundary was not justified.</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that policies relating to new residential development should reference the requirement to be subject to Habitats Regulations Assessment (HRA) and adhere to the Suffolk HRA Recreational (Disturbance) Avoidance and Mitigation Strategy (RAMS) where the location falls within the established 13 km zones of influence.</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was suggested the policy was unsound as it provides insufficient flexibility to respond to rapid change and did not reflect the approach in national policy of preserving the character of the countryside.</td>
</tr>
</tbody>
</table>

**Policy WLP1.4 – Infrastructure**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that Policy WLP1.4 makes no reference to the necessity to improve rural junctions, in particular the junction on the A146 from Barnby. It was argued it was necessary for roundabout to be provided in this location.</td>
<td>Mr R Gill (Rep ID:124)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It as questioned whether it would be viable to expand Barnby Primary School</td>
<td>Mr R Gill (Rep ID:124)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> There was concern raised about the capacity of GP surgeries and the difficulty in recruiting new GPs locally.</td>
<td>Mr R Gill (Rep ID:124)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> Concern was raised about the capacity of the electricity supply to Barnby.</td>
<td>Mr R Gill (Rep ID:124)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concern was raised about the priority afforded to sustainable transport and that the Third Crossing and other road improvements would create more traffic and congestion.</td>
<td>CTC (John Thompson)(Rep ID:294) CTC (John Thompson)(Rep ID:330)</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was stated that the policy should be amended to clarify that only sites of sufficient scale should be required to provide a new school.</td>
<td>Benacre Company (Savills (UK) Ltd) (Rep ID:392)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was stated that in order to make the policy effective the supporting text should set out that the on-site/off-site distinction between CIL and Section 106 is not absolute, and will be regulated by the District Council’s Regulation 123 List.</td>
<td>Suffolk County Council (Robert Feakes)(Rep ID:495)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was stated that reference to a particular third crossing option should be removed. It was stated the policy should be amended to ensure any third crossing and flood mitigation will not impact upon the port.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 564)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> Concern was raised that sufficient capital funding will not be generated through the CIL or council tax to support the proposed capital projects.</td>
<td>Halesworth Town Council (N Rees) (Rep ID:965)</td>
</tr>
</tbody>
</table>

### Strategy for the Lowestoft Area

**Introduction and summary of strategy.**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concern raised that the strategy is unbalanced as it focuses on housing only without adequate infrastructure and employment.</td>
<td>Mr Houghton (Rep ID: 35)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that the strategy for Lowestoft was overly optimistic, unrealistic and undeliverable. It was suggested that key sites were not deliverable as proposed and that the allocation of greenfield sites would be counterproductive in regenerating brownfield sites.</td>
<td>Hopkins Homes (Armstrong Rigg Planning)(Rep ID:355)</td>
</tr>
</tbody>
</table>
Infrastructure Needs

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concern was raised about the provision of a pedestrian and cycle bridge at Brooke Peninsula. It was stated there was a lack of clarity about the nature of the proposed pedestrian and cycle bridge in relation to navigation rights in the harbour.</td>
<td>Mr Bennett (Rep ID: 112/113); Mr Gray (Rep ID: 46)</td>
</tr>
</tbody>
</table>

Policy WLP2.1 – Central and Coastal Lowestoft Regeneration

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> The Broads Authority stated that they needed to be listed as a stakeholder in the policy.</td>
<td>Broads Authority (Natalie Beal) (Rep ID: 164)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was requested that references to the proposed pedestrian and cycle bridge be deleted.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.) (Rep ID: 563)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that reference to a particular third crossing option should be removed.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.) (Rep ID: 563)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was stated that the policy does not adequately reflect or deal with the implications from growth in the offshore sector.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.) (Rep ID: 563)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Objection was raised at the proposed loss of employment premises on the waterfront and the impact of new housing on existing employment premises on the north shore of Lake Lothing.</td>
<td>Mr Wylson (Rep ID: 637)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was stated that updated Strategic Flood Risk Assessment should be referred to in the supporting text.</td>
<td>Environment Agency (Rep ID: 708)</td>
</tr>
</tbody>
</table>

Policy WLP2.2 – PowerPark

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the Policy should distinguish between the parts of the site which are within the statutory port and those which</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.) (Rep ID: 562)</td>
</tr>
</tbody>
</table>
Main Issue 2: It was stated that the policy should include a requirement that ensures any future development does not place unreasonable restrictions or expectations on the Port and its operations.

Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 562)

Main Issue 3: It was stated that the plan in general fails to mention the fishing industry. It was suggested that the outer harbour would need to accommodate a significant increase in fishing activity over the plan period.

Renaissance of East Anglian Fishing (REAF) (June Mummery)(Rep ID:639)

Main Issue 4: It was stated that the policy should reflect the findings of the Level 2 Strategic Flood Risk Assessment.

Environment Agency(Rep ID:709)

Policy WLP2.3 – Peto Square

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: It was stated that the area of the site which is within the statutory Port of Lowestoft should be removed.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 559)</td>
</tr>
<tr>
<td>Main Issue 2: It was stated that the policy should include a requirement that ensures any future development does not place unreasonable restrictions or expectations on the Port and its operations.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 559)</td>
</tr>
<tr>
<td>Main Issue 3: It was stated that the policy should refer to the Strategic Flood Risk Assessment as a source of information on flood risk.</td>
<td>Environment Agency (Rep ID:710)</td>
</tr>
<tr>
<td>Main Issue 4: It was stated that the policy should reflect the findings of the Level 2 Strategic Flood Risk Assessment.</td>
<td>Environment Agency(Rep ID:710)</td>
</tr>
</tbody>
</table>

Policy WLP2.4 – Kirkley Waterfront and Sustainable Urban Neighbourhood

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: Concern was raised about the use of the former Brooke Marine site for housing rather than employment use . .</td>
<td>Mr Houghton (Rep ID: 21) Mr I Slater (Rep ID:75)</td>
</tr>
<tr>
<td>Main Issue 2: It was suggested that access to the</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID:</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>site could be achieved through the former Sanyo factory site which would avoid the need for the access road to result in a reduction in the size of the County Wildlife Site.</td>
<td>268</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that the policy should be amended to state that a 2 form entry primary school should be provided of 2.2 hectares with the inclusion a pre-school setting.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:537) Education and Skills Funding Agency (Douglas McNab)(Rep ID:630)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> Concern was raised about the provision of a pedestrian and cycle bridge at Brooke Peninsula.</td>
<td>Mr Gray (Rep ID:46); Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 558)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was stated that reference to a particular third crossing option should be removed.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd.)(Rep ID: 558)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was stated that the quantum of employment land within the allocation should be reduced to an extent which is supported by evidence.</td>
<td>Statuslist Limited (GVA Grimley Limited) (Rep ID:560)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was suggested that 1380 homes should be a minimum for the site with support in the policy for additional dwellings subject to design and technical evidence.</td>
<td>Statuslist Limited (GVA Grimley Limited) (Rep ID:560)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was stated that references directing the distribution of land-uses should be removed from the policy and the policy should be applied flexibly to prioritise the delivery of viable regeneration proposals.</td>
<td>Statuslist Limited (GVA Grimley Limited) (Rep ID:560)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> It was stated that the policy does not support the delivery of the Third Crossing due to the requirement for land to retained for B1, B2 and B8 uses in the Riverside Road area.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:589)</td>
</tr>
<tr>
<td><strong>Main Issue 10:</strong> It was stated that the policy should refer to the Strategic Flood Risk Assessment as a source of information on flood risk or the Policy WLP8.24 is referenced.</td>
<td>Environment Agency (Rep ID:711)</td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was stated that the potential for contamination should be detailed.</td>
<td>Environment Agency (Rep ID:711)</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was stated that the site was not well suited to retirement housing and that a</td>
<td>McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd)(Rep ID:799)</td>
</tr>
</tbody>
</table>
Main Issue Representations
preferred site would be Site 14 – Saxons Way, Halesworth.

Main Issue 13: It was suggested that more emphasis should be placed on creating a destination of the waterfront with active frontages and urban housing.
Lowestoft Town Council (Shona Bendix) (Rep ID: 851)

Main Issue 14: It was stated that the policy should reflect the findings of the Level 2 Strategic Flood Risk Assessment.
Environment Agency (Rep ID: 711)

**Policy WLP2.5 – East Of England Park**

Main Issue Representations
Main Issue 1: It was suggested that an archaeological investigation would be necessary.
Mr Butcher (Rep ID: 13)

**Policy WLP2.6 – Western End of Lake Lothing**

Main Issue Representations
Main Issue 1: It was suggested a joined up approach with site WLP2.4 was required.
Lowestoft Town Council (Shona Bendix) (Rep ID: 854)

Main Issue 2: It was stated that the policy should reflect the findings of the Level 2 Strategic Flood Risk Assessment.
Environment Agency (Rep ID: 712)

**Policy WLP2.7 – Former Battery Green Car Park**

Main Issue Representations
Main Issue 1: Concern was raised about the conflict between residential development and the port.
Lowestoft Town Council (Shona Bendix) (Rep ID: 858)

**Policy WLP2.8 – Former Lowestoft Hospital**

Main Issue Representations
Main Issue 1: It was stated that the second bullet point of the policy should be replaced with a requirement for good design.
Lowestoft Town Council (Shona Bendix) (Rep ID: 859)

Main Issue 2: It was suggested that the site was not available for development and therefore
Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID: 935)
Main Issue | Representations
---|---
would not contribute towards the five year supply of housing.

**Policy WLP2.9 – Historic High Street**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the reference to exceptional design needed some interpretation.</td>
<td>Lowestoft Town Council (Shona Bendix)(Rep ID:860)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that community and cultural uses should be allowed on ground floors in addition to A class uses.</td>
<td>Lowestoft Town Council (Shona Bendix)(Rep ID:860)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that reference to a design guide should be replaced by an expectation that the neighbourhood plan will set out design requirements.</td>
<td>Lowestoft Town Council (Shona Bendix)(Rep ID:860)</td>
</tr>
</tbody>
</table>

**Policy WLP2.10 – Inner Harbour Port Area**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested that South Quay was unsuitable for mooring boats and is currently of poor appearance.</td>
<td>Mr Houghton (Rep ID:70)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that the supporting text and policy could be more supportive and positive about the development of the Inner Harbour Port Area.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd) (Rep ID:557)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that the statutory port area should be shown on the Policies Map.</td>
<td>Associated British Ports (Adams Hendry Consulting Ltd) (Rep ID:557)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was stated that the policy does not support the delivery of the Third Crossing due to the restriction for port related uses.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:590)</td>
</tr>
</tbody>
</table>

**Policy WLP2.13 – North of Lowestoft Garden Village**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concern was raised about the impact on infrastructure and the impact of increased traffic, particularly on Corton Long Lane.</td>
<td>M J Edwards &amp; Partners (Chris Edwards) (Rep ID:119) J Clutten (Rep ID:467) Mr Clutten (Rep ID:510) Mr and Mrs C Oliver (Rep ID:621)</td>
</tr>
</tbody>
</table>
Main Issue | Representations
---|---
**Main Issue 2:** It was suggested that the housing needs accommodated on the site could be met by other options. | M J Edwards & Partners (Chris Edwards) (Rep ID: 119) |
**Main Issue 3:** Objections were raised over the loss of countryside and grade 2 agricultural land. | M J Edwards & Partners (Chris Edwards) (Rep ID: 119)  
Mr Clutten (Rep ID: 515) |
**Main Issue 4:** Objection was raised about the impact on the tenant farmer’s business and equestrian business. | M J Edwards & Partners (Chris Edwards) (Rep ID: 119);  
M J Edwards & Partners (Chris Edwards) (Rep ID: 375)  
Tenant Farmers Association (George Dunn) (Rep ID: 259) |
**Main Issue 5:** Concern was raised that there was a lack of employment in the area to support the amount of development planned. | M J Edwards & Partners (Chris Edwards) (Rep ID: 119) |
**Main Issue 6:** It was suggested that there need to be a clear separation of the new development from Corton and Lowestoft. | J Clutten (Rep ID: 469)  
Mr and Mrs C Oliver (Rep ID: 621) |
**Main Issue 7:** Concern was raised there was no statement of how the land value will be captured for the community or what arrangements will be put in place to guarantee community ownership and the long-term stewardship of the land in line with Garden City Principles. | Mr Eyres (Rep ID: 646) |
**Main Issue 8:** It was stated that the site was not well suited to retirement housing and that a preferred site would be Site 14 – Saxons Way, Halesworth. | McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd) (Rep ID: 800) |

**Policy WLP2.14 – Land North of Union Lane, Oulton**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
</table>
**Main Issue 1:** Concern was raised about the impact of development on highway safety. | Mr L Mason and Ms A Lund (Rep ID: 251)  
Ms O’Callaghan (Rep ID: 615) |
**Main Issue 2:** Concern was raised about impact on wildlife. It was stated that the policy should include the protection of any habitats of ecological value on the site and include measures to mitigate or compensate any impacts | Mr L Mason and Ms A Lund (Rep ID: 251);  
Suffolk Wildlife Trust (James Meyer) (Rep ID: 270) |
### Main Issue Representations

**Main Issue 3:** Concern was raised about the impact of development on infrastructure including medical services.
- Mr L Mason and Ms A Lund (Rep ID:251)
- Ms O’Callaghan (Rep ID:615)

**Main Issue 4:** Concern was raised over the provision of sufficient pre-school places. It was suggested that land should be reserved on either WLP2.14 or WLP2.15 for the provision of a new pre-school setting.
- Suffolk County Council (Robert Feakes) (Rep ID:530)

**Main Issue 5:** It was requested that the policy was made more flexible with respect to the number of homes to ensure the most efficient use of land.
- Oldman Homes (Bidwells, Darren Cogman) (Rep ID:743)

**Main Issue 6:** It was suggested that the requirements for an ecological assessment, transport assessment and site investigation were not necessary as they could be secured by national planning policy and local validation requirements.
- Oldman Homes (Bidwells, Darren Cogman) (Rep ID:743)

**Main Issue 7:** It was suggested that the site would only deliver 40 units rather than 80 within the five year period as there is no planning application currently submitted.
- Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:936)

### Policy WLP2.15 – Land between Hall Lane and Union Lane, Oulton

**Main Issue Representations**

**Main Issue 1:** Concern was raised about the impact of development on access, traffic and highway safety.
- Mr L Mason and Ms A Lund (Rep ID:251)
- Mrs Saunders (Rep ID:665)

**Main Issue 2:** Concern was raised about impact on wildlife. It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.
- Mr L Mason and Ms A Lund (Rep ID:251)
- Suffolk Wildlife Trust (James Meyer) (Rep ID:271)
- Mrs Saunders (Rep ID:665)

**Main Issue 3:** Concern was raised about the impact of development on infrastructure including medical services.
- Mr L Mason and Ms A Lund (Rep ID:251); Mrs Saunders (Rep ID:665)

**Main Issue 4:** It was considered that development would cause harm to the setting of the grade II* listed Manor House.
- Historic England (Rep ID:841)
- Mrs Saunders (Rep ID:665)

**Main Issue 5:** Concern was expressed about the
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>impact of development on a pillbox on the site.</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 6</strong>: Concern was raised over the provision of sufficient pre-school places. It was suggested that land should be reserved on either WLP2.14 or WLP2.15 for the provision of a new pre-school setting.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:531)</td>
</tr>
<tr>
<td><strong>Main Issue 7</strong>: Concern was raised about the impact of development on surface water flooding.</td>
<td>Mrs Saunders (Rep ID:665)</td>
</tr>
<tr>
<td><strong>Main Issue 8</strong>: It was suggested that the policy should be amended to allow for a secondary vehicular access from Union Lane.</td>
<td>Ms Corbin (Bidwells, Darren cogman)(Rep ID:692)</td>
</tr>
<tr>
<td><strong>Main Issue 9</strong>: It was requested that the policy was made more flexible with respect to the number of homes to ensure the most efficient use of land.</td>
<td>Ms Corbin (Bidwells, Darren cogman)(Rep ID:692)</td>
</tr>
<tr>
<td><strong>Main Issue 10</strong>: It was suggested that the requirements for an ecological assessment, transport assessment and archaeological evaluation were not necessary as they could be secured by national planning policy and local validation requirements.</td>
<td>Ms Corbin (Bidwells, Darren cogman)(Rep ID:692)</td>
</tr>
<tr>
<td><strong>Main Issue 11</strong>: It was suggested that the site would only deliver 50 units rather than 100 within the five year period as there is no planning application currently submitted.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:937)</td>
</tr>
</tbody>
</table>

**Policy WLP2.16 – Land South of The Street, Carlton Colville**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: Concerns were raised about access to the site and the impact of traffic on nearby roads. It was suggested that access should be taken from Shaw Avenue or Ullswater.</td>
<td>Gisleham Parish Council (Rep ID: 29); Gisleham Parish Council (Rep ID: 193); Mr and Mrs Deal (Rep ID: 117); Mr Chase (Rep ID: 230); Mr Rogers (Rep ID: 232); Mr Rogers (Rep ID: 233); Carlton Colville Town Council (Alison Ayers)(Rep ID:611); Ms Chase (Rep ID:659)</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
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<tr>
<td>------------</td>
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</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that a preferential site to accommodate 900 homes would be land south of Rookery Park, known as Eades Farm.</td>
<td>Gisleham Parish Council (Rep ID: 29); Mr and Mrs Deal (Rep ID: 117); Ms Leedham (Rep ID:131) Carlton Colville Town Council (Alison Ayers)(Rep ID:611)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that lower density housing and the school should be on the eastern edge of the development and western edge of the development should be for sheltered accommodation.</td>
<td>Gisleham Parish Council (Rep ID: 29)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> Concern was raised that the development may increase the risk of flooding from surface water run-off and the sewerage network.</td>
<td>Mr and Mrs Deal (Rep ID: 117); Mr Chase (Rep ID: 230) Carlton Colville Town Council (Alison Ayers)(Rep ID:611) Ms Chase (Rep ID:659)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concern was raised about the impact on infrastructure particularly medical care.</td>
<td>Ms Leedham (Rep ID:131) Carlton Colville Town Council (Alison Ayers)(Rep ID:611)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> Concern was raised that the positioning of the access road was in contrary to the conclusions of the Heritage Impact Assessment.</td>
<td>Mr Rogers (Rep ID: 233)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 272)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was suggested that providing parking and drop-off points at the school would encourage more car use.</td>
<td>CTC (John Thompson) (Rep ID: 343)</td>
</tr>
</tbody>
</table>
| **Main Issue 9:** Concern was raised about reliance on a large site for housing delivery. It was suggested that the following alternative smaller sites should be developed in addition or instead of part of the WLP2.16 site:  
  - Land at Hall Road, Carlton Colville  
<p>| <strong>Main Issue 10:</strong> It was stated that the policy should be amended to state that a 2 form entry primary school should be provided of 2.2hectares rather than 2 and mention the | Suffolk County Council (Robert Feakes) (Rep ID:538) Education and Skills Funding Agency (Douglas McNab)(Rep ID:632) |</p>
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>inclusion a pre-school setting.</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was stated that the supporting text should request the developer to consider integrating flood mitigation with the access and layout at the earliest opportunity.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:541)</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was stated that the policy should be explicit on the potential requirements for prior extraction of the minerals, as the site is within a minerals consultation area.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID:571)</td>
</tr>
<tr>
<td><strong>Main Issue 13:</strong> It was stated that a pedestrian link should be provided over undeveloped land to the east of the site to connect with the South Lowestoft Industrial Estate.</td>
<td>Mr Eyres (Rep ID: 647)</td>
</tr>
<tr>
<td><strong>Main Issue 14:</strong> It was stated that the policy should refer to the Strategic Flood Risk Assessment as a source of information on flood risk or the Policy WLP8.24 is referenced. It was suggested that there is a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues and this should be referenced in the policy.</td>
<td>Environment Agency (Rep ID:715)</td>
</tr>
<tr>
<td><strong>Main Issue 15:</strong> It was stated that pedestrian links to Ullswater, Shaw Avenue and Low Farm Drive would utilise third-party land and therefore the policy should not seek them.</td>
<td>Meridian Strategic Land (JCN Design &amp;Planning)(Rep ID: 777)</td>
</tr>
<tr>
<td><strong>Main Issue 16:</strong> It was suggested that the requirements for an ecological assessment, transport assessment and archaeological evaluation were not necessary as they could be secured by local validation requirements.</td>
<td>Meridian Strategic Land (JCN Design &amp;Planning)(Rep ID: 777)</td>
</tr>
<tr>
<td><strong>Main Issue 17:</strong> It was stated that the site was not well suited to retirement housing and that a preferred site would be Site 14 –Saxons Way, Halesworth.</td>
<td>McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd)(Rep ID:801)</td>
</tr>
<tr>
<td><strong>Main Issue 18:</strong> It was stated that more clarity could be provided with respect to the car park for the school and country park given that they are within the setting of heritage assets.</td>
<td>Historic England (Rep ID:842)</td>
</tr>
<tr>
<td><strong>Main Issue 19:</strong> It was recommended that building heights are set for the most sensitive</td>
<td>Historic England (Rep ID:842)</td>
</tr>
</tbody>
</table>
Main Issue 20: It was stated that the policy should reflect the findings of the Level 2 Strategic Flood Risk Assessment.

Environment Agency (Rep ID: 715)

### Policy WLP2.17 – Land at South Lowestoft Industrial Estate

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should allow for access from Tower Road as well as Hadenham Road.</td>
<td>Suffolk County Council (Brian Prettyman) (Rep ID: 219)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 273)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that there is a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues and this should be referenced in the policy.</td>
<td>Environment Agency (Rep ID: 717)</td>
</tr>
</tbody>
</table>

### Policy WLP2.19 – Oakes Farm, Beccles Road, Carlton Colville

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested that an archaeological investigation would be necessary.</td>
<td>Mr Butcher (Rep ID: 13)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 274)</td>
</tr>
</tbody>
</table>
| **Main Issue 3:** It was suggested that the parameters for enabling development on the site should be broadened and made more flexible. It was suggested that the area for enabling development should be extended to 8.5 hectares. | Essex and Suffolk Water (Savills(UK)Ltd)(Rep ID: 612)  
MS Oakes(Mark Oakes)(Rep ID: 661) |
| **Main Issue 4:** It was stated that the policy should be amended to require protection of the clean water pipe which traverses the site. | Essex and Suffolk Water (Savills(UK)Ltd)(Rep ID: 612) |
| **Main Issue 5:** It was suggested that there is a | Environment Agency (Rep ID: 717) |
Main Issue | Representations
--- | ---
need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues and this should be referenced in the policy. | 

**Main Issue 6:** It was suggested the text was inconsistent with national planning policy as it referred to enabling development. | Suffolk Preservation Society (Fiona Cairns)(Rep ID: 313)

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**Policy WLP2.20 – Gunton Park, off Old Lane, Corton**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should be amended to reference replacement cricket pitches.</td>
<td>Sport England (Rep ID: 482)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that the policy was amended to ensure that the impact of the development on the setting of the grade II listed Gunton Hall is assessed, and the setting is preserved.</td>
<td>Bourne Leisure (Lichfields)(Rep ID:595)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> Objections were raised about highway access.</td>
<td>Mr and Mrs C Oliver (Rep ID:620); M and R Shiers (Rep ID:804)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was considered inappropriate to build on a sport and recreational facility.</td>
<td>Mr and Mrs C Oliver (Rep ID:620); M and R Shiers (Rep ID:804)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concerns were raised about the density of development.</td>
<td>M and R Shiers (Rep ID:804)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was suggested that the site would not contribute towards the five year supply of housing as a replacement site for the rugby club has not been found.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:938)</td>
</tr>
</tbody>
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**Beccles and Worlingham**

**Strategy for Beccles and Worlingham**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was asserted that Beccles Medical Centre is currently inadequate and an</td>
<td>Mr Wilkinson (Rep ID: 18)</td>
</tr>
</tbody>
</table>
additional medical centre will be required.

<table>
<thead>
<tr>
<th>Main Issue 2:</th>
<th>It was argued that traffic mitigation such as park and ride should make up part of the strategy.</th>
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<tbody>
<tr>
<td></td>
<td>CTC (John Thompson) (Rep ID: 344)</td>
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</table>

<table>
<thead>
<tr>
<th>Main issue 3:</th>
<th>It was argued that Beccles and Worlingham should take a higher level of growth.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
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</table>

**Strategy for Beccles and Worlingham - Infrastructure**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that there is inadequate parking in central Beccles to cope with the proposed growth.</td>
<td>Mr Harris (Rep ID: 90); Beccles Neighbourhood Plan Operational Group (David Goldstone) (Rep ID: 192); S Knights (Rep ID: 649); Linda Ayres (Rep ID: 503)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> Concerns were raised over the capacity of the highway network to accommodate the increase in traffic. It was suggested that traffic levels should be monitored and mitigated as required over the life time of the local plan.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 234); Beccles Neighbourhood Plan Operational Group (David Goldstone) (Rep ID: 192); Beccles Town Council (C Boyne) (Rep ID: 676); S Knights (Rep ID: 649)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> Concerns were raised over the ability of allocated sites to fund infrastructure via CIL and/or Section 106 agreements.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 234); Beccles Town Council (C Boyne) (Rep ID: 676)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that the proposed amount of housing in Beccles and Worlingham is excessive.</td>
<td>S Knights (Rep ID: 649)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> It was stated that the proposed growth will increase air pollution.</td>
<td>S Knights (Rep ID: 649)</td>
</tr>
<tr>
<td><strong>Main issue 6:</strong> It was argued that the proposed growth would increase crime due to empty houses.</td>
<td>S Knights (Rep ID: 649)</td>
</tr>
<tr>
<td><strong>Main issue 7:</strong> It was argued that purpose made cycle tracks should be developed.</td>
<td>Rosemary Simpson (Rep ID: 658)</td>
</tr>
</tbody>
</table>

**Policy WLP3.1 –Beccles and Worlingham Garden Neighbourhood**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concerns were raised about the</td>
<td>Mr and Mrs Spence (Rep ID: 163);</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
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<tr>
<td>------------</td>
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<tr>
<td>Increased volume of traffic on the roads and impact on town centre parking.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 234); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650);</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> Concerns were raised in relation to the capacity of Medical Centres and GP surgeries and it was argued that a medical centre should be included in the allocation. It was requested to add a bullet point to the policy to include land for a medical centre.</td>
<td>Mr and Mrs Spence (Rep ID: 163); D Kirby (Rep ID: 622); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650); Beccles Town Council (C Boyne) (Rep ID: 676)</td>
</tr>
<tr>
<td><strong>Main issue 3:</strong> Concerns were raised over the ability of allocated sites to fund infrastructure via CIL and/or Section 106 agreements.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 234); Beccles Society (Paul Fletcher) (Rep ID: 235)</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was stated that the site should have an ecological appraisal prior to allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 275)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> It was argued that the large allocation is not effective and creates significant risk and delay for housing delivery. It was suggested that smaller sites should be added to the supply in Beccles to improve the supply of housing including land at Sandpit Lane, Worlingham.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Gilder) (Rep ID: 388)</td>
</tr>
<tr>
<td><strong>Main issue 6:</strong> It was opined that there has been no meaningful public engagement. It was requested to add a reference to community engagement as opposed to community consultation in the supporting text.</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650)</td>
</tr>
<tr>
<td><strong>Main issue 7:</strong> It was stated that the amount of housing in the Parish of Worlingham is too great and not justified.</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248); Susan Doherty (Rep ID: 650)</td>
</tr>
<tr>
<td><strong>Main issue 8:</strong> It was argued that the Beccles and Worlingham Garden Neighbourhood layout should be altered with respect to the size of the country park and the position of the Beccles/Worlingham parish boundary. An amendment to the policy was requested to reflect this.</td>
<td>Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248); Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td><strong>Main issue 9:</strong> It was contended that the policy should recognise potential effects on air pollution from increased traffic. An additional</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Susan Doherty (Rep ID: 650)</td>
</tr>
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<td>Main Issue</td>
<td>Representations</td>
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<td>---------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>bullet point to the policy requiring air pollution monitoring and</td>
<td>D Kirby (Rep ID: 622);</td>
</tr>
<tr>
<td>appropriate mitigation was requested.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 10:</strong> It was argued that the policy should provide</td>
<td>Chenerys’ Land Partnership (Wheatman Planning Ltd.) (Rep ID: 476); Beccles Town Council (C Boyne) (Rep ID: 676)</td>
</tr>
<tr>
<td>greater clarity including trigger points for the provision of</td>
<td></td>
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<tr>
<td>infrastructure, access and facilities in order to be considered</td>
<td></td>
</tr>
<tr>
<td>effective.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 11:</strong> It was argued that the policy should specify a school</td>
<td>Education and Skills Funding Agency (Douglas McNab) (Rep ID: 633); Suffolk County Council (Robert Feakes) (Rep ID: 539)</td>
</tr>
<tr>
<td>size of 2.2 rather than 2 hectares.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 12:</strong> It was argued that there was no sustainable strategy</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td>informing location of growth in Beccles and Worlingham.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 13:</strong> It was argued that the plan has not been positively</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640); Worlingham Neighbourhood Planning Team (Wendy Summerfield) (Rep ID: 248)</td>
</tr>
<tr>
<td>prepared due to the risks to a comprehensive development arising from</td>
<td></td>
</tr>
<tr>
<td>multiple land owners. An additional sentence specifying that</td>
<td></td>
</tr>
<tr>
<td>piecemeal applications on small parcels of land will not be permitted was</td>
<td></td>
</tr>
<tr>
<td>requested.</td>
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</tr>
<tr>
<td><strong>Main issue 14:</strong> It was argued that site management of the finished</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td>development should be reflected in the policy. It was requested to add a</td>
<td></td>
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<tr>
<td>bullet point relating to a management plan.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 15:</strong> It was argued that the policy lacks clarity on how</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td>neighbourhood plans can influence provision of infrastructure and design</td>
<td></td>
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<tr>
<td>of development. An amendment was requested to add reference to Neighbourhood Plans influencing infrastructure items to address the needs of the community.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 16:</strong> It was contended that the policy should take account</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td>of the community centre being developed in Worlingham.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 17:</strong> It was argued that the policy is too precise in</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td>relation to pedestrian and cycle links and an amendment was requested to</td>
<td></td>
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<tr>
<td>make.</td>
<td></td>
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<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>------------</td>
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</tr>
<tr>
<td>the policy broader less precise in this respect and to demonstrate a clear network of cycling and pedestrian links as part of a transport assessment or travel plan with a planning application.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 18:</strong> It was argued that design codes should be used to provide a consistent approach to design across the development and an additional bullet point in the policy to this effect was requested.</td>
<td>Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td><strong>Main issue 19:</strong> It was argued that there is insufficient capacity in the sewerage system to cope with the proposed growth.</td>
<td>Susan Doherty (Rep ID: 650)</td>
</tr>
<tr>
<td><strong>Main issue 20:</strong> Concerns were raised over surface water flooding on the site.</td>
<td>Susan Doherty (Rep ID: 650)</td>
</tr>
<tr>
<td><strong>Main issue 21:</strong> Concerns were raised over an increase in crime arising from new development.</td>
<td>Susan Doherty (Rep ID: 650)</td>
</tr>
<tr>
<td><strong>Main issue 22:</strong> It was stated that reference to Sustainable drainage systems should be included.</td>
<td>Environment Agency (Rep ID: 719)</td>
</tr>
<tr>
<td><strong>Main issue 23:</strong> It was contended that design and landscaping should take account of the proximity to the Broads National Park and Suffolk Coast and Heaths AONB.</td>
<td>Natural England (Rep ID: 751)</td>
</tr>
<tr>
<td><strong>Main issue 24:</strong> It was stated that the site was not well suited to retirement housing and that a preferred site would be Site 14 –Saxons Way, Halesworth.</td>
<td>McCarthy and Stone Retirement Lifestyles Ltd (The Planning Bureau Ltd)(Rep ID: 802)</td>
</tr>
<tr>
<td><strong>Main issue 25:</strong> It was argued that employment land is not justified and should be reduced.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
</tr>
<tr>
<td><strong>Main issue 26:</strong> Concerns were raised regarding the weight given to the masterplan and accompanying report. Amendments and/or deletions of parts of the policy and supporting text were requested to reflect this.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930) Worlingham Parish Council (Lesley Beevor) (Rep ID: 640)</td>
</tr>
<tr>
<td><strong>Main issue 27:</strong> It was argued that the quantum of housing on the Garden Neighbourhood, particularly on Larkfleet’s site, is too low.</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
</tr>
<tr>
<td><strong>Main issue 28:</strong> It was argued that vehicular access points should not be restricted to the</td>
<td>Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)</td>
</tr>
</tbody>
</table>
### Main Issue 29: Southern Relief Road

It was argued that the policy is too prescriptive on the location of the primary school, community hub, C2 uses, retirement housing and open space and the policy should be made more flexible.

**Representations**

Larkfleet Homes (Strategic Planning Research Unit - DLP (Planning) Limited (Rep ID: 930)

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### Policy WLP3.2 – Land West of London Rd, Beccles

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Highway safety concerns were raised about the position of the vehicular access on to London Road. Concerns were raised over the capacity of highway network to accommodate the increase in traffic.</td>
<td>Mr Milton (Rep ID: 20); Mr Crane (Rep ID: 250); Beccles Society (Paul Fletcher) (Rep ID: 236); Michelle Golding (Rep ID: 651)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> Concerns were raised over the ability of allocated sites to fund infrastructure via CIL and/or Section 106 agreements.</td>
<td>Beccles Society (Paul Fletcher) (Rep ID: 236)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was argued that the allocation should be extended to include land to the west.</td>
<td>Mr Montagu (Rep ID: 362); Mrs Montagu (Rep ID: 446)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was opined that the allocation should include a small convenience store.</td>
<td>Rosemary Simpson (Rep ID: 657)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was suggested that open space should include an outdoor gym and wildlife corridors.</td>
<td>Rosemary Simpson (Rep ID: 657)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was contended that the policy should take into account the setting of protected landscapes and the vicinity of designated sites.</td>
<td>Natural England (Rep ID: 752)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was argued that the policy is not sufficiently flexible in terms of dwelling numbers and it should be amended to read “approximately 280 dwellings.”</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was argued that the policy should allow for the possibility of two vehicular accesses in to the allocation site and the policy wording should be altered to reflect this.</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> It was argued that the requirement for a landscape buffer of 10 metres width should</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)</td>
</tr>
</tbody>
</table>
Main Issue 1: It was requested to include reference to remedying potential contamination from the former airfield in the policy.

Representations: Environment Agency (Rep ID: 721)

Main Issue 2: It was contended that the design and landscaping should take account of the setting of protected landscapes and nearby designated sites.

Representations: Natural England (Rep ID: 753)

Policy WLP3.3 Land South of Benacre Road at Ellough Airfield, Ellough

Main Issue 1: It was argued that the policy should include flexibility so that a contamination study does not need to cover the entire site.

Representations: Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)

Main Issue 10: It was requested that a paragraph is added to the supporting text to support delivery in two phases.

Representations: Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 807)

Main Issue 12: It was requested to include reference to remediating potential contamination from the former airfield in the policy.

Representations: Environment Agency (Rep ID: 721)

Main Issue 2: It was contended that the design and landscaping should take account of the setting of protected landscapes and nearby designated sites.

Representations: Natural England (Rep ID: 753)

Strategy for the Halesworth and Holton Area

Main Issue 1: It was stated that the site should make provision for a new early education setting.

Representations: Suffolk County Council (Robert Feakes) (Rep ID: 533)

MainIssue 13: It was suggested that the site would deliver only 25 units in the five year period rather than 75.

Representations: Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:939)

Main Issue 2: It was suggested that the level of Mr E Milburn (Rep ID:383)
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>development proposed for Halesworth was unsustainable given the lack of secondary education provision.</td>
<td>Halesworth Town Council (N Rees)(Rep ID:952)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that the Strategic Gap Policy from the existing Local Plan be retained in the new Local Plan.</td>
<td>Mr E Milburn (Rep ID:383)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that flood protection should be added to the list of infrastructure needs.</td>
<td>Mr E Milburn (Rep ID:418)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was stated that the impact on electricity, gas and telecoms infrastructure had not been considered.</td>
<td>Halesworth Town Council (N Rees)(Rep ID:956)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> Concern was raised that the Community Infrastructure Levy or increased council tax receipts would not generate enough funds to cover costs of infrastructure.</td>
<td>Halesworth Town Council (N Rees)(Rep ID:956)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> The results of the transport modelling were disputed and it was suggested that the increase in population would have a significant impact.</td>
<td>Halesworth Town Council (N Rees)(Rep ID:962)</td>
</tr>
</tbody>
</table>

**Policy WLP4.1 – Halesworth Healthy Neighbourhood**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was requested that Town Farm house was removed from the boundary of the allocation.</td>
<td>Mr E Milburn (Rep ID:386)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID:276)</td>
</tr>
</tbody>
</table>
| **Main Issue 3:** It was argued that the site was not sustainably located to meet the needs for elderly residents. Two sites at Saxons Way were suggested in addition.  
  - Site 14 – Saxons Way, Halesworth.  
  Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID: 402) |
| **Main Issue 4:** It was suggested that the density of and number of homes on the site to the east of the former middle school was too high. | Mr E Milburn (Rep ID:407) |
### Main Issue | Representations
---|---
**Main Issue 5:** It was requested that the allocation was specific with regards to type of homes. | Mr E Milburn (Rep ID:407)
**Main Issue 6:** It was stated that the trigger point of 100 dwellings was unjustified and could create a ransom situation. | Richborough Estates Ltd (Brown & Co) (Rep ID:696)
**Main Issue 7:** It was suggested that the requirements for an ecological assessment, transport assessment and archaeological investigation were not necessary as they could be secured by local validation requirements. | Richborough Estates Ltd (Brown & Co) (Rep ID:696)
**Main Issue 8:** It was stated that the location of the sports facilities and associated infrastructure could impact on the setting of Town Farm and the policy does not specify what would be most appropriate closest to Town Farm. | Historic England (Rep ID:845)
**Main Issue 9:** It was suggested that the site would only deliver 40 units rather than 80 within the five year period as there is no planning application currently submitted. | Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:940)

### Policy WLP4.2 - Land adjacent to Chediston Street.

| Main Issue | Representations |
---|---|
**Main Issue 1:** Concerns were raised over drainage and the impact on flooding. | Mrs Boyd (Rep ID:23)  
Mr Derham (Rep ID: 101)  
Mr Osborne (Rep ID: 118)  
Ms Silver (Rep ID: 258)  
Mrs J Saunders (Rep ID:415)  
Mrs C Slater (Rep ID: 479)  
Mr M Fagg (Rep ID:774)  
Mr J Young (Rep ID:805)  
Halesworth Town Council (N Rees)(Rep ID:952) |
**Main Issue 2:** Concern was raised about the impact of development on wildlife. | Mrs Boyd (Rep ID:23)  
Mr Osborne (Rep ID: 118)  
Mrs C Slater (Rep ID: 479)  
Mr M Fagg (Rep ID:774)  
Halesworth Town Council (N Rees)(Rep ID:952) |
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 3:</strong> Concerns were raised over impact on residential amenity.</td>
<td>Mrs Boyd (Rep ID:23) Halesworth Town Council (N Rees)(Rep ID:952)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that the development would remove a landing point for the emergency ambulance helicopter service.</td>
<td>Mrs Boyd (Rep ID:23)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concerns were raised over the impact on infrastructure and the impact on traffic in the town.</td>
<td>Mrs Boyd (Rep ID:23) Mr Derham (Rep ID: 100) Mr Osborne (Rep ID: 118) Ms Silver (Rep ID: 258) Mrs J Saunders (Rep ID:415) Mr M Fagg (Rep ID:774) Halesworth Town Council (N Rees)(Rep ID:952)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was noted that Roman archaeological artefacts had been found on the site and development could have a detrimental impact on archaeology.</td>
<td>Mrs J Saunders (Rep ID:415) Mrs C Slater (Rep ID: 479)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was suggested that the site was not in a sustainable location as access to services and facilities and employment is undermined by the nature of Chediston Street. It was suggested that the site was poorly located to employment and education and other facilities to the north of the town.</td>
<td>Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774) Mr J Young (Rep ID:805)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was suggested that the site was located over a historical landfill.</td>
<td>Mrs C Slater (Rep ID: 479) Mr M Fagg (Rep ID:774)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> Concern was raised over the impact on the landscape.</td>
<td>Mrs C Slater (Rep ID: 479) Halesworth Town Council (N Rees)(Rep ID:952) Mr M Fagg (Rep ID:774)</td>
</tr>
<tr>
<td><strong>Main Issue 10:</strong> The loss of grade 2 agricultural land was objected to.</td>
<td>Mrs C Slater (Rep ID:479) Mr M Fagg (Rep ID:774) Mr J Young (Rep ID:805)</td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was suggested that site 122 land west of Norwich Road would be preferable to this site.</td>
<td>Mrs C Slater (Rep ID:479) Mr M Fagg (Rep ID:774)</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was stated that the policy was</td>
<td>Suffolk County Council (Robert Feakes)(Rep</td>
</tr>
</tbody>
</table>
### Policy WLP4.3 – Land North of Old Station Road

No main issues.

### Policy WLP4.4 – Land west of Lodge Road, Holton

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: Concern was raised over the impact on infrastructure, including the primary school in Holton.</td>
<td>Mr Henderson (Rep ID: 260)</td>
</tr>
</tbody>
</table>

### Policy WLP4.5 – Land at Dairy Farm, Saxons Way

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: It was stated that the site should not be required to provide a pre-school or community facility as there were alternative options for accommodating this need.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID:229)</td>
</tr>
<tr>
<td>Main Issue 2: It was questioned whether the site would be viable to provide a pre-school and community facility.</td>
<td>Badger Building (E.Anglia)Ltd (Edward Gilder) (Rep ID:229)</td>
</tr>
<tr>
<td>Main Issue 3: Concern was expressed over the impact on infrastructure, particularly healthcare.</td>
<td>Mr D Storey (Rep ID:628)</td>
</tr>
<tr>
<td>Main Issue 4: It was stated that an ecological assessment should be undertaken on the site prior to clearance of scrub and construction.</td>
<td>Mr D Storey (Rep ID:628)</td>
</tr>
<tr>
<td>Main Issue 5: It was stated that there was insufficient information in the policy and supporting text with regard to impact on the setting of nearby heritage assets.</td>
<td>Historic England (Rep ID:849)</td>
</tr>
<tr>
<td>Main Issue 6: It was suggested that the site</td>
<td>Larkfleet Homes (Strategic Planning Research)</td>
</tr>
</tbody>
</table>
Main Issue | Representations
--- | ---
would only deliver 20 units rather than 40 within the five year period as there is no planning application currently submitted. | Unit – DLP (Planning) Ltd.) (Rep ID:940)

**Main Issue 7:** The importance of the provision of the community centre was noted. It was requested that additional clarity on the nature of community centre was added to the text. | Halesworth Town Council (N Rees)(Rep ID:963)
Halesworth Town Council (N Rees)(Rep ID:966)

**Policy WLP4.6 – Broadway Farm, West of Norwich Road.**

Main Issue | Representations
--- | ---
**Main Issue 1:** It was stated that the policy was ineffective as it wasn’t clear whether an archaeological evaluation would be required or not. | Suffolk County Council (Robert Feakes)(Rep ID:518)

**Main Issue 2:** It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation. | Suffolk Wildlife Trust (James Meyer) (Rep ID: 277)

**Bungay**

**Strategy for Bungay**

Main Issue | Representations
--- | ---
**Main issue 1:** Concerns were raised over the cumulative flooding impact from proposed development. It was argued that site WLP5.1 should be used for flood mitigation and not be built upon. | Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 358, 408)

**Main issue 2:** It was suggested that more employment land should be allocated in Bungay. | Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 395)

**Main issue 3:** It was asserted that the homes built figure has been incorrectly calculated. | Maureen Davison (Rep ID: 460)

**Main issue 4:** It was requested that the strategy for Bungay should provide a ‘reasonable’ level of growth of ‘a minimum’ of 485 new houses. | Tim Basey-Fisher (John Long Planning) (Rep ID: 592)
The Slater Family (Bidwells) (Rep ID: 688)
## Infrastructure

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main issue 1:</strong> Concerns were raised over parking provision at the approved community centre and medical centre site.</td>
<td>Christine Brown (Rep ID: 27)</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> Concerns were expressed regarding the capacity of Bungay medical centre to accommodate the proposed growth.</td>
<td>Peter Scott (Rep ID: 107); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 403, 406)</td>
</tr>
<tr>
<td><strong>Main issue 3:</strong> Concerns were raised over traffic generation from the proposed growth.</td>
<td>Peter Scott (Rep ID: 107)</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> Concerns were raised in relation to the lack of green space in Bungay.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 406)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> Concerns were raised over the capacity of the sewerage network to accommodate the proposed growth</td>
<td>Christine Brown (Rep ID: 26)</td>
</tr>
</tbody>
</table>

## WLP5.1 - Land East of St Johns Road, Bungay

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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<tbody>
<tr>
<td><strong>Main issue 1:</strong> Concerns were raised in relation to the visual impact of development on this site. It was argued that the landscaped buffer is not consistent with the buffer on site WLP5.2.</td>
<td>Peter Scott (Rep ID: 106, 110); Mr and Mrs J V Palin (Rep ID: 191); Diane Scott (Rep ID: 217); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 395, 43, 449); Maureen Davison (Rep ID: 468)</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> Concerns were raised about the impact on wildlife habitat. It was requested to amend the policy to include suitable buffers at the boundary and ecological enhancements.</td>
<td>Peter Scott (Rep ID: 106, 110); Mr and Mrs J V Palin (Rep ID: 191); Diane Scott (Rep ID: 217); Suffolk Wildlife Trust (James Meyer) (Rep ID: 278)</td>
</tr>
<tr>
<td><strong>Main issue 3:</strong> It was argued that the pedestrian and cycle path should be adjacent to boundary of the houses on Kerrison Road and Fairfield Road.</td>
<td>Peter Scott (Rep ID: 108, 111); Diane Scott (Rep ID: 218); Malcolm Tate (Rep ID: 261); Maureen Davison (Rep ID: 468)</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was contended that any new dwellings should be limited to single storey.</td>
<td>Peter Scott (Rep ID: 109, 111); Mr and Mrs J V Palin (Rep ID: 191); Diane Scott (Rep ID: 220); Malcolm Tate (Rep ID: 261); Dominic Belisario (Rep ID: 447)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> Concerns were raised relating to</td>
<td>Diane Scott (Rep ID: 217);</td>
</tr>
</tbody>
</table>
### Main Issue

**flooding on the site and the importance of this site acting as flood mitigation for site WLP5.2. It was requested that this site is used for flood mitigation and open space rather than built development.**

**Representations**

Bungay Town Council (P Morrow) (Rep ID: 693); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 410, 412, 448, 449, 492)

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**Main issue 6: Concerns were raised over highway safety and it was requested to include traffic calming such as a bypass or roundabout in the local plan.**

**Representations**

Diane Scott (Rep ID: 221); Peter Scott (Rep ID: 107); Dominic Belisario (Rep ID: 447); Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 411, 449); Maureen Davison (Rep ID: 461, 468)

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**Main issue 7: It was asserted that 30 dwellings per hectare should be the maximum density.**

**Representations**

Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 449)

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**Main issue 8: It was contended that the pedestrian and cycle way on the northwest edge of the site is little used.**

**Representations**

Maureen Davison (Rep ID: 464)

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**Main issue 9: It was argued that the 85 dwellings should be a minimum or approximate number.**

**Representations**

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)

---

**Main issue 10: It was argued that a further masterplan should determine the density; developable area and landscaped buffer.**

**Representations**

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)

---

**Main issue 11: It was argued that the Policy’s requirements for planning applications to be supported by ecology, archaeology, flood risk and transport assessments are not necessary as they are covered by other policies in the Local Plan.**

**Representations**

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)

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**Main issue 12: It was requested that the policy should clarify that the pedestrian and cycle links are only required up to the edge of the site.**

**Representations**

Tim Basey-Fisher (John Long Planning) (Rep ID: 587)

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### WLP5.2 - Land West of St Johns Road, Bungay

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main issue 1:</strong> it was argued that ecological assessment is required prior to allocating the site. It was requested that the policy specifies that development avoids or mitigates ecological impacts and provides ecological enhancements.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 279)</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> It was asserted that more</td>
<td>Bungay Neighbourhood Development Plan</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>------------</td>
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</tr>
<tr>
<td>Employment land should be allocated on this site.</td>
<td>Steering Group (Ken Lodge) (Rep ID: 453)</td>
</tr>
<tr>
<td><strong>Main issue 3:</strong> It was contended that traffic calming should be included such as traffic lights or a roundabout.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 454)</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was argued that the area for allotments should be increased to 0.5 hectares.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 456)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> Concerns were raised relating to the management of surface water drainage and whether the flood mitigation on WLP5.1 will be sufficient.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 457)</td>
</tr>
<tr>
<td><strong>Main issue 6:</strong> It was contended that B8 uses will only be acceptable if all HGV traffic is diverted around the town centre.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 458)</td>
</tr>
<tr>
<td><strong>Main issue 7:</strong> It was asserted that housing density should be a maximum of 30 dwellings per hectare and preferably less.</td>
<td>Bungay Neighbourhood Development Plan Steering Group (Ken Lodge) (Rep ID: 458)</td>
</tr>
<tr>
<td><strong>Main issue 8:</strong> It was requested that the extension to the school playing field is increased to 2.75 hectares.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 540)</td>
</tr>
<tr>
<td><strong>Main issue 9:</strong> It was requested that text is added to the policy stating that the development should be phased to consider the provision of sufficient school places</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 540)</td>
</tr>
<tr>
<td><strong>Main issue 10:</strong> An additional criterion for the policy was requested to say that sand and gravel resources will be tested to judge if they should be used during development.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 584)</td>
</tr>
<tr>
<td><strong>Main issue 11:</strong> It was stated that the policy is too restrictive in specifying the number of dwellings.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
</tr>
<tr>
<td><strong>Main issue 12:</strong> It was argued that the policy is too restrictive with respect to housing density.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
</tr>
<tr>
<td><strong>Main issue 13:</strong> It was asserted that the policy should provide more clarity on the pre-school setting.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601)</td>
</tr>
<tr>
<td><strong>Main issue 14:</strong> It was argued that the requirement for the employment land to be developed in advance or concurrently with the housing should be removed.</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (Rep ID: 687)</td>
</tr>
<tr>
<td><strong>Main issue 15:</strong> It was requested that the policy</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID:</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>should clarify that the pedestrian and cycle links are only required up to the edge of the</td>
<td>601)</td>
</tr>
<tr>
<td>site</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 16:</strong> It was argued that the policy’s requirements for planning applications</td>
<td>Tim Basey-Fisher (John Long Planning) (Rep ID: 601); The Slater Family (Bidwells) (</td>
</tr>
<tr>
<td>to be supported by ecology, archaeology, flood risk and transport assessments are not</td>
<td>Rep ID: 687)</td>
</tr>
<tr>
<td>necessary as they are covered by other policies in the Local Plan.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 17:</strong> It was asserted that the employment land should not be reduced and</td>
<td>Bungay Town Council (P Morrow) (Rep ID: 693)</td>
</tr>
<tr>
<td>should be developed at the same time or in advance of residential development on the</td>
<td></td>
</tr>
<tr>
<td>site.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 18:</strong> It was argued that the policy is unsound on heritage grounds due to</td>
<td>Historic England (Rep ID: 856)</td>
</tr>
<tr>
<td>lack of evidence.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 19:</strong> It was argued that the policy should allow more flexibility with</td>
<td>The Slater Family (Bidwells) (Rep ID: 687)</td>
</tr>
<tr>
<td>respect to the type of employment uses that will be permitted.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 20:</strong> It was contended that the policy should be more flexible with respect</td>
<td>The Slater Family (Bidwells) (Rep ID: 687)</td>
</tr>
<tr>
<td>to open space, landscaping and coach parking/turning on the site.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 21:</strong> It was suggested that the site would deliver only 60 units in the</td>
<td>Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID:942)</td>
</tr>
<tr>
<td>five year period rather than 110.</td>
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</tbody>
</table>

**Strategy for Southwold and Reydon**

**Introduction and Strategy**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested that building more homes to reduce commuting was not</td>
<td>Mr Reaney (Rep ID:59)</td>
</tr>
<tr>
<td>effective due to the different reasons in which people commute.</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> Concern was raised that new homes would not be affordable or would end</td>
<td>Mr Reaney (Rep ID:59)</td>
</tr>
<tr>
<td>up being second homes or rental properties. It was</td>
<td>Southwold and Reydon Society (Rep ID:667)</td>
</tr>
<tr>
<td></td>
<td>Reydon Parish Council (Jean Brown)(Rep ID:698)</td>
</tr>
</tbody>
</table>
suggested that all new homes in Southwold and Reydon are occupied as the principal residence.

**Main Issue 3:** It was considered it was not justified, effective or consistent with national policy to rely on a single large site. It was suggested additional sites were required in Southwold and Reydon in order to meet needs.

<table>
<thead>
<tr>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr North (Artisan PPS Ltd) (Rep ID:443 ) Reydon Action Group for the Environment (Stephen Chessher)(Rep ID:733)</td>
</tr>
</tbody>
</table>

**Main Issue 4:** It was questioned why brownfield sites such as the former Southwold Police Station and Fire Station and land next to Sole Bay Health Clinic have not been allocated in preference.

<table>
<thead>
<tr>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr Clack (Rep ID:653)</td>
</tr>
</tbody>
</table>

**Main Issue 5:** It was suggested that if planning consent is not given at the St Felix School for residential development, the proposed homes lost from that site should not be replaced elsewhere in Reydon.

<table>
<thead>
<tr>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Southwold and Reydon Society (Rep ID:668) Reydon Parish Council (Jean Brown)(Rep ID:698)</td>
</tr>
</tbody>
</table>

**Main Issue 6:** It was stated that the strategy for Southwold and Reydon was unjustified and ineffective as it allocates too little development to address the lack of affordability for local people in the area. Land west of Keens Lane was suggested.

<table>
<thead>
<tr>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hopkins Homes (Armstrong Rigg Planning )(Rep ID:810)</td>
</tr>
</tbody>
</table>

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### Policy WLP6.1 – Land West of Copperwheat Avenue

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concern was raised over the impact of the development on infrastructure and the highway network.</td>
<td>Mr Tickner (Rep ID:44) Mr Reaney(Rep ID:67) G Duke (Rep ID:626)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Main Issue 2:</th>
<th>It was considered that the site would have an impact on the landscape and the Area of Outstanding Natural Beauty. It was stated that in order to be sound, a requirement for a Landscape and Visual Impact Assessment should be added to the policy.</th>
</tr>
</thead>
</table>

| Main Issue 3: It was suggested the reservation of 7 plots for the relocation of properties at risk to erosion did not justify the allocation of the | Mr Reaney(Rep ID:64) |
Main Issue 4: The site was considered too large for the neighbourhood and impact on the enjoyment of the public right of way on the western boundary. It was suggested the site should be reduced to no more than 50 homes.

Mr Reaney (Rep ID: 65)
Mr Reaney (Rep ID: 66)

Main Issue 5: Concern was raised about the impact of development on the setting of the grad II listed Gorse Lodge.

Mr Reaney (Rep ID: 68)
Mr North (Artisan PPS Ltd) (Rep ID: 445)

Main Issue 6: It was stated that a wildlife audit should be undertaken to justify the suitability of the site for allocation.

Suffolk Wildlife Trust (James Meyer) (Rep ID: 281)

Main Issue 7: It was suggested the size of the site should be reduced by 50% and the residual housing allocated to land off Green Lane (Site 5/38) or alternatively allocate land off Green Lane in addition to site.

Mr North (Artisan PPS Ltd) (Rep ID: 445)

Main Issue 8: It was stated that the policy should be amended to require the testing of the quality of the mineral resource within the site prior to development taking place.

Suffolk County Council (Robert Feakes) (Rep ID: 585)

Main Issue 9: It was suggested that the site would only deliver 50 units rather than 100 within the five year period as there is no planning application currently submitted.

Larkfleet Homes (Strategic Planning Research Unit – DLP (Planning) Ltd.) (Rep ID: 936)

Policy WLP6.2 – Southwold Harbour

Main Issue 1: It was stated that paragraph 6.19 of the supporting next needed to be updated to reflect the flood risk permitting regime.

Environment Agency (Rep ID: 725)

Strategy for Rural Areas

Policy WLP7.1 Settlement Hierarchy
<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was noted that with the exception of site WLP7.4 none of the rural sites have been subject to wildlife audit. Ecological assessment was recommended prior to site allocation.</td>
<td>Suffolk Wildlife Trust (James Meyer) (Rep ID: 282)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the rural strategy is unjustified, unsound and inappropriate as it results in unsustainable patterns of development and reliance on travel by private car. It was suggested that growth in rural areas, particularly small villages with very few facilities, should be reduced and distributed to the market towns and reduce the overall number of homes allocated to rural areas to 5%.</td>
<td>Hopkins Homes (Armstrong Rigg Planning) (Rep ID: 356)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that the proportion of growth should be increased from 10 to 12% as per the First Draft Local Plan.</td>
<td>Sotterley Estate (Evolution Town Planning) (Rep ID: 333); Somerleyton Estate (Evolution Town Planning) (Rep ID: 678)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that Brampton is being treated as a ‘larger village’</td>
<td>Christine Silver (Rep ID: 255)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was argued that the plan should reinstate the site WLP7.20 for 30 dwellings in Willingham as per the First Draft Local Plan.</td>
<td>Sotterley Estate (Evolution Town Planning) (Rep ID: 333);</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was argued that the plan should reinstate the site WLP7.6 in Somerleyton for 45 dwellings as per the First Draft Local Plan.</td>
<td>Somerleyton Estate (Lord Somerleyton) (Rep ID: 678)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> It was argued that the plan should reinstate the site WLP7.8 for 22 dwellings on land north of Wangford Road in Wangford as per the First Draft Local Plan.</td>
<td>Bellingham Homes Limited (Wheatman Planning Ltd.) (Rep ID: 525);</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was argued that the plan should include of site 90 ‘Land on The Hill’, Barnby for approximately 30 dwellings as per the Options for the new Waveney Local Plan.</td>
<td>Wellington Construction Ltd (MDPC Ltd.) (Rep ID: 642)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> It was argued that the plan should include land off Hill Road &amp; Wangford Road (B1126), Wangford.</td>
<td>Mr &amp; Mrs R J Miller (Rep ID: 775)</td>
</tr>
</tbody>
</table>
### Policy WLP7.2 – Land between The Street and A146, Barnby

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that the plan should include of site 90 ‘Land on The Hill’, Barnby for approximately 30 dwellings as per the Options for the new Waveney Local Plan.</td>
<td>Wellington Construction Ltd (MDPC Ltd.) (Rep ID: 643)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was argued that the plan should include the site on New Road for 8 houses.</td>
<td>John Egan (Rep ID: 969)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that development in Barnby and North Cove is unnecessary due to the development in Beccles and Worlingham.</td>
<td>Mr R Gill (Rep ID: 146)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was suggested that development would have a detrimental effect on the amenity of nearby properties.</td>
<td>Mr R Gill (Rep ID: 146)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concern was raised that development would have a detrimental impact on the landscape, the tree lined streetscape and be contrary to the Settlement Fringe Study.</td>
<td>Mr R Gill (Rep ID: 146)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> It was suggested that trees are attractive but are not effective to combat noise and have maintenance issues.</td>
<td>Barnby Parish Council (Jayne Evans) (Rep ID: 578)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> Concern was raised about road safety issues including site access, on-street parking, access onto the A146 and increased traffic.</td>
<td>Mr R Gill (Rep ID: 146 &amp; 237), Barnby Parish Council (Jayne Evans) (Rep ID: 568 &amp; 573); Ian and Lynne Bond (Rep ID: 627)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> It was stated that off road parking should not be directly from The Street.</td>
<td>Barnby Parish Council (Jayne Evans) (Rep ID: 572)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> It was requested that the play area should not be located with access directly from The Street.</td>
<td>Barnby Parish Council (Jayne Evans) (Rep ID: 572 &amp; 581)</td>
</tr>
<tr>
<td><strong>Main Issue 10:</strong> It was suggested the site was not suitable as it was noted that there was a lack of public transport.</td>
<td>Ian and Lynne Bond (Rep ID: 627)</td>
</tr>
<tr>
<td><strong>Main Issue 11:</strong> It was stated that development would result in the loss of high grade agricultural land.</td>
<td>Mr R Gill (Rep ID: 146)</td>
</tr>
<tr>
<td><strong>Main Issue 12:</strong> It was noted that the school is outdated with no on-site parking and expanding the school is not viable. It was suggested the school site could be developed for housing and</td>
<td>Mr R Gill (Rep ID: 146)</td>
</tr>
<tr>
<td>Main Issues</td>
<td>Representations</td>
</tr>
<tr>
<td>-------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>students relocated to the proposed new school in Beccles and Worlingham.</td>
<td></td>
</tr>
</tbody>
</table>

**Main Issue 13:** It was suggested that the additional 15 school places required seemed low.  
Ian and Lynne Bond (Rep ID: 627)

**Main Issues 14:** Concern was raised about poor infrastructure/lack of services and facilities.  
Mr R Gill (Rep ID: 146); Barnby Parish Council (Jayne Evans) (Rep ID: 568 & 575); Ian and Lynne Bond (Rep ID: 627)

**Main Issue 15:** Concern was raised about flooding along The Street.  
Mr R Gill (Rep ID: 146)

**Main Issue 16:** It was stated that Mill Lane should not be used as a guide for new development.  
Barnby Parish Council (Jayne Evans) (Rep ID: 568 & 572)

**Policy WLP7.3 - Land South of Lound Road, Blundeston**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: Concern was raised over the impact on wildlife in boundary hedges and nearby in the water course and pond.</td>
<td>Mr Craig and Mrs Julie Harris (Rep ID: 619)</td>
</tr>
</tbody>
</table>

| Main Issue 2: It was stated there was a risk of surface water flooding and impact on water courses in the vicinity. | Mr Craig and Mrs Julie Harris (Rep ID: 619) |

**Policy WLP7.4 - Land North of Pickwick Drive, Blundeston**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1: It was suggested that development would put a strain on the existing poor surface water and sewage systems.</td>
<td>Ian Burwood (Rep ID: 89);</td>
</tr>
</tbody>
</table>

| Main Issue 2: There were concerns regarding increased traffic, noise, pollution, risk of accidents at the junction of Pickwick Drive and Market Lane, and unsuitability of Pickwick Drive for plant machinery and HGV’s. | Anthony Light (Rep ID: 529); Mr Atkinson (Rep ID: 617) |

| Main Issue 3: It was suggested there would be an impact on wildlife. | Anthony Light (Rep ID: 529) |

| Main Issue 4: It was stated there was an inadequate bus service to support the | Anthony Light (Rep ID: 529) |
Policy WLP7.5 Land North of The Street, Somerleyton

Main Issue 1: A number of conditions, rather than a single condition was requested to ensure land contamination is dealt with appropriately.

Main Issue 2: Clarity was requested regarding the ‘heritage asset assessment’.

Environmental Agency (Rep ID: 728)

Historic England (Rep ID: 865)

Policy WLP7.6 - Mill Farm Field, Somerleyton

Main Issue 1: Additional text regarding two ring ditches in the north east of the site which are likely to be prehistoric burial monuments was requested.

Main issue 2: It was requested that the site size was increased to 3.03 hectares with 45 dwellings as per the First Draft Local Plan.

Main Issue 3: It was suggested that the site would benefit from an indicative masterplan.

Suffolk County Council (Robert Feakes) (Rep ID: 521);

Somerleyton Estate (Evolution Town Planning) (Rep ID: 678 & 681)

Historic England (Rep ID: 867)

Policy WLP7.7 - Land North of Elms Lane, Wangford

Main issue 1: It was argued that the plan should include land off Hill Road & Wangford Road (B1126), Wangford in the Local Plan in preference to site WLP7.7

Main Issue 2: Concern about traffic and road safety issues were raised including -
- The local traffic had not been fully considered in the Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018).
- Elms Lane is narrow and busy due to the veterinarian practice, agriculture vehicles and cars accessing garages.

Mr & Mrs R J Miller (Rep ID: 776)

John Turner (Rep ID: 38, 39 & 43);

Bryony Nokes (Rep ID: 618)
<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
</table>
| • Not suitable for increased traffic.  
• Impact on pedestrians, cyclists, joggers and equestrian users | |
| **Main Issue 3**: It was suggested the houses will be purchased as second homes and holiday lets and need safeguarding for social housing and affordable rents to local residents and new families. | John Turner (Rep ID: 40); |
| **Main Issue 4**: It was stated that trees and hedgerows should be protected and reinforced where possible. | John Turner (Rep ID: 41); |
| **Main Issue 5**: Concern was raised that a lack of a primary school means Wangford is unsuitable for family homes. | John Turner (Rep ID: 42);  
Lloyd Scriven (Rep ID: 138); |
| **Main Issue 6**: It was stated that a detailed landscape and visual impact assessment was required at application stage. | Natural England (Rep ID: 757) |
| **Main Issue 7**: It was stated that development would have adverse impact on the AONB and be contrary to the Settlement Fringe Landscape Sensitivity Study (2016), the Sustainability Appraisal Report of the Waveney Local Plan shows the proposed site scores negatively for landscape impact, and the NPPF. | Lloyd Scriven (Rep ID: 133, 135, 136, 137, 140 & 142 & 144);  
Bryony Nokes (Rep ID: 618); |
| **Main Issue 8**: It was stated that development could impact on the Conservation Area. | Bryony Nokes (Rep ID: 618) |
| **Main Issue 9**: It was stated that development could impact on the ecosystem, hedgerows and wildlife including a badger set. | Bryony Nokes (Rep ID: 618);  
Lloyd Scriven (Rep ID: 141); |
| **Main Issue 10**: It was noted that there is strategic trunk water main across the site that makes development unfeasible without being diverted. | Lloyd Scriven (Rep ID: 134); |
| **Main Issue 11**: An adverse impact on residential amenity particularly Mill House and Red House was noted. | Lloyd Scriven (Rep ID: 145); |
| **Main Issue 12**: Concern was raised over a lack of infrastructure to support development including poor drainage, electricity supply, variable broadband, and variable mobile | Bryony Nokes (Rep ID: 618);  
Lloyd Scriven (Rep ID: 144); |
<table>
<thead>
<tr>
<th><strong>Main Issues</strong></th>
<th><strong>Representations</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> The need for housing in Wrentham was queried.</td>
<td>Emily Marsh (Rep ID: 224); Fiona Anderson (Rep ID: 528)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that an alternative site in Wrentham would have been better suited.</td>
<td>John Tibble (Rep ID: 91); Emily Marsh (Rep ID: 222)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> Concerns were raised over access and road safety.</td>
<td>Emily Marsh (Rep ID: 222); Mr and Mrs Michael and Alison Hickford (Rep ID: 253); Fiona Anderson (Rep ID: 517, 522 &amp; 534); David Rogers (Rep ID: 420 &amp; 507)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> The lack of bus stops/bus service near the site was noted and the distance from the site to the village centre and surgery.</td>
<td>Fiona Anderson (Rep ID: 522); David Rogers (Rep ID: 391 &amp; 475)</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> Concern was raised over the loss of popular footpaths which are not shown on the map.</td>
<td>David Rogers (Rep ID: 387 &amp; 475); Fiona Anderson (Rep ID: 519)</td>
</tr>
<tr>
<td><strong>Main Issue 6:</strong> Concern was raised over air pollution.</td>
<td>David Rogers (Rep ID: 420 &amp; 421 &amp; 507); Fiona Anderson (Rep ID: 536)</td>
</tr>
<tr>
<td><strong>Main Issue 7:</strong> Concern was raised over flooding and drainage problems.</td>
<td>Emily Marsh (Rep ID: 222 &amp; 224); Mr and Mrs Michael and Alison Hickford (Rep ID: 253); David Rogers (Rep ID: 394); Fiona Anderson (Rep ID: 523); Neil and Alison Munro (Rep ID: 660)</td>
</tr>
<tr>
<td><strong>Main Issue 8:</strong> Concern was raised over the impact on the AONB. It was suggested that any planning application needs to be supported by a Landscape and Visual Impact Assessment and landscaping scheme.</td>
<td>Emily Marsh (Rep ID: 224); Suffolk County Council (AONB Team) (Rep ID: 377); Natural England (Rep ID: 758)</td>
</tr>
<tr>
<td><strong>Main Issue 9:</strong> Concern was raised over the impact on the outlook from properties on Priory</td>
<td>Emily Marsh (Rep ID: 222)</td>
</tr>
</tbody>
</table>

**Wrentham Strategy and Site Allocations & Policy WLP7.8 – Land North of Chapel Road**

**Main Issue 13:** The loss of grade 3 agricultural land was objected to. | Lloyd Scriven (Rep ID: 144); |
<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Road, High Street, Chatten Close.</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 10</strong>: It was stated that development would have an impact on wildlife and ancient oak trees.</td>
<td>Emily Marsh (Rep ID: 222 &amp; 224); Fiona Anderson (Rep ID: 519); Emily Marsh (Rep ID: 224)</td>
</tr>
<tr>
<td><strong>Main Issue 11</strong>: It was stated that development would have an impact on the Conservation Area.</td>
<td>Fiona Anderson (Rep ID: 520); Fiona Anderson (Rep ID: 536)</td>
</tr>
<tr>
<td><strong>Main Issue 12</strong>: Change the supporting text and policy were requested to ensure planning application were supported by archaeological investigation.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 526)</td>
</tr>
<tr>
<td><strong>Main Issue 13</strong>: Concern was raised over the lack of a primary school in the village, lack of school places nearby, lack of school buses to Brampton and Kessingland, general poor provision of school buses, and lack of a safe school bus stop.</td>
<td>Emily Marsh (Rep ID: 223); David Rogers (Rep ID: 421); Fiona Anderson (Rep ID: 531); Neil and Alison Munro (Rep ID: 660)</td>
</tr>
<tr>
<td><strong>Main Issue 14</strong>: It was stated that there was a lack of services and jobs in the village.</td>
<td>David Rogers (Rep ID: 420); Fiona Anderson (Rep ID: 528)</td>
</tr>
<tr>
<td><strong>Main Issue 15</strong>: It was suggested there was a poor/failing sewerage system.</td>
<td>David Rogers (Rep ID: 421); Fiona Anderson (Rep ID: 531)</td>
</tr>
<tr>
<td><strong>Main Issue 16</strong>: It was suggested to increase site WLP7.8 to include land to the east and increase the allocated dwellings from 60 to 65.</td>
<td>Benacre Company (Savills (UK)Ltd.) (Rep ID: 405 &amp; 409)</td>
</tr>
<tr>
<td><strong>Main Issue 17</strong>: It was suggested to remove policy requirements for-</td>
<td>Benacre Company (Savills (UK)Ltd.) (Rep ID: 409)</td>
</tr>
<tr>
<td>- housing density</td>
<td></td>
</tr>
<tr>
<td>- 1.5 high storey dwelling height along the north and west boundary</td>
<td></td>
</tr>
<tr>
<td>- a landscaping scheme</td>
<td></td>
</tr>
<tr>
<td>- a completed ecological assessment, and</td>
<td></td>
</tr>
<tr>
<td>- footpath along the entire frontage of the site.</td>
<td></td>
</tr>
</tbody>
</table>
## Policy WLP7.9 Land south of Southwold Road, Brampton

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
</table>
| **Main Issue 1** – Concerns were raised that the existing settlement to the west of the A145 will be to separate from the community facilities and will require a designated crossing. | Lesley Mayne – (Rep ID: 47, 50)  
Nicholas Mayne – (Rep ID: 72, 80) |
| **Main Issue 2** – It was raised that this site may not be the most suitable for development due to the existing traffic issues at the school, which would be exacerbated by an expansion and the inclusion of the car park, the exposure of the site, and electricity wires crossing the site and it was suggested that small developments either side of the A145 would be preferred. | Lesley Mayne – (Rep ID: 54, 56)  
Nicholas Mayne – (Rep ID: 79, 84)  
CTC (John Thompson) – (Rep ID: 345) |
| **Main Issue 3** – There were concerns raised that infrastructure provision is currently unsuitable for the proposed development. | Lesley Mayne – (Rep ID: 47)  
Nicholas Mayne – (Rep ID: 79) |
| **Main Issue 4** – Concerns were raised that the size of the development and requirement for social housing is disproportionate to the size of the existing village. | Lesley Mayne – (Rep ID: 47, 48)  
Nicholas Mayne – (Rep ID: 72) |
| **Main Issue 5** – There were concerns that an expansion of 12 places at the school would not be sufficient to accommodate the additional children from Brampton and the surrounding villages. | Brampton Parish Council – (Rep ID: 680) |
| **Main Issue 6** – There were concerns that too many alternative sites had been disregarded because they were not considered to be adjacent to the built up area of the village. It was stated that adjacent is an ambiguous term and the use of greenfield land was questioned. | Glynn Buck – (Rep ID: 478)  
Christine Silver – (Rep ID: 256)  
CTC(John Thomson)– (Rep ID: 345) |
| **Main issue 7** – There were concerns raised that the requirement to deliver all parts of the site concurrently would threaten deliverability. | Durrant’s (Christopher Hobson) – (Rep ID: 663) |
### Policy WLP7.10 – Land at Toodley Farm, Station Road, Brampton

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1 – There were concerns that developing this site could have an impact on Great Crested Newts that are reported to be present in the area as well as other uses in the surrounding area.</td>
<td>Jill Williams – (Rep ID: 162) Mr Dashwood – (Rep ID: 116) Roy Harris – (Rep ID: 161)</td>
</tr>
<tr>
<td>Main Issue 2 – There were concerns that the local road network and other local infrastructure was not sufficient to accommodate the proposed development.</td>
<td>Jill Williams – (Rep ID: 162) Mr Dashwood – (Rep ID: 115) Roy Harris – (Rep ID: 161)</td>
</tr>
<tr>
<td>Main Issue 3 – Concerns were raised that the station car park would not be expanded as it is not owned by the rail network and a member of the public owns a right of way over the land. It was also stated that there is insufficient land to extend the car park.</td>
<td>Mr Dashwood – (Rep ID: 114) Roy Harris – (Rep ID: 161) Lesley Mayne (Rep ID: 52) Nicholas Mayne – (Rep ID: 77)</td>
</tr>
<tr>
<td>Main Issue 4 – Concerns were raised that using the site for self-build only would harm the deliverability of the site.</td>
<td>Artisan PPS Ltd (Leslie Short) – (Rep ID: 372)</td>
</tr>
</tbody>
</table>

### Policy WLP7.11 – Land South of Hogg Lane, Ilketshall St Lawrence

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1 – There were concerns raised over the cost of upgrading local infrastructure that is already overstretched making the site financially unviable.</td>
<td>John Eames – (Rep ID:160)</td>
</tr>
</tbody>
</table>

### Policy WLP7.12 – Land East of the Street, Lound

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Issue 1 – Concerns were raised that there is insufficient infrastructure in the village to accommodate the proposed development.</td>
<td>Jessica Baisley – (Rep ID: 132)</td>
</tr>
<tr>
<td>Main Issue 2 – A resident had concerns that the proposed development would exacerbate the parking issues currently seen on The Street.</td>
<td>Jessica Baisley – (Rep ID: 132)</td>
</tr>
<tr>
<td>Main Issue 3 – There were concerns that the site could still have a detrimental impact on the</td>
<td>Historic England – (Rep ID: 872)</td>
</tr>
<tr>
<td>Main Issues</td>
<td>Representations</td>
</tr>
<tr>
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<tr>
<td>church.</td>
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</tr>
</tbody>
</table>

**Policy WLP7.13 – Land North of Chapel Road, Mutford**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – Concern was raised that development on this site could have an impact on the setting of the AONB.</td>
<td>Suffolk County Council (AONB Team) – (Rep ID: 378)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – A respondent argued that the road system is too narrow and inadequate for additional traffic and the density should be reduced.</td>
<td>Mr P Tavener (Rep ID:1)</td>
</tr>
</tbody>
</table>

**Policy WLP7.14 – Land North of School Road, Ringsfield**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – There were concerns that this allocation could exacerbate the traffic issues seen on School Road associated with the school and the local holiday development.</td>
<td>Richard Sayer – (Rep ID: 635) Margaret Sayer – (Rep ID: 652)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – There were concerns that developing this site could have a detrimental impact on the Wildlife at John John’s Wood.</td>
<td>Richard Sayer – (Rep ID: 635) Margaret Sayer – (Rep ID: 652)</td>
</tr>
</tbody>
</table>

**Policy WLP7.15 – Land East of Mill Road, Rumburgh**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – Concerns were raised that the site is not deliverable at the proposed density or overall as it has been considered for development for the past 22 years.</td>
<td>Mr Peter Hughes – (Rep ID: 266) Tim Basey-Fisher – (Rep ID: 477)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – Existing infrastructure and services were considered to not be sufficient to accommodate the proposed development. It was also stated that the site would not support existing services and facilities.</td>
<td>Mr Peter Hughes – (Rep ID: 263, 266) Rumburgh Parish Council – (Rep ID: 419)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong> – The soundness of the site and its alignment with other Local Plan policies was questioned.</td>
<td>Rumburgh Parish Council – (Rep ID: 419)</td>
</tr>
</tbody>
</table>
### Policy WLP7.16 – Land East of Woodfield Close, Willingham

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
</table>
| **Main Issue 1** – Representatives stated that this allocation is in contradiction to Local Plan Historic Environment policies and the NPPF in relation to its impact on White Crossbow Cottage. | Kieran McDonald – (Rep ID: 364, 366, 368, 370, 431)  
Caroline McDonald – (Rep ID: 437, 440, 441)  
Edward Baker – (Rep ID: 425)  
Sharon Baker – (Rep ID: 429) |
| **Main Issue 2** – Existing infrastructure was not considered to be sufficient to accommodate this allocation and there are insufficient proposals for improvements in areas such as broadband. | Kieran McDonald – (Rep ID: 364, 365, 370, 371)  
Caroline McDonald – (Rep ID: 438) |
| **Main Issue 3** – The allocation of this site was questioned as other sites in Willingham, such as the site behind The Fox public house, are preferred by the local community. | Kieran McDonald – (Rep ID: 433)  
Caroline McDonald – (Rep ID: 436) |
| **Main Issue 4** – Concerns were raised that the access to the allocated site is not sufficient or safe for motor users or pedestrians. | Kieran McDonald – (Rep ID: 366, 369)  
Edward Baker – (Rep ID: 424)  
Sharon Baker – (Rep ID: 427)  
Caroline McDonald – (Rep ID: 439, 442) |
| **Main Issue 5** – Concerns were raised about the loss of open space and the impact on wildlife if this allocation was developed. | Kieran McDonald – (Rep ID: 366)  
Edward Baker – (Rep ID: 425)  
Sharon Baker – (Rep ID: 429)  
Caroline McDonald – (Rep ID: 439)  
Rosemary and Alan Corcoran – (Rep ID: 487) |
| **Main Issue 6** – It was stated that the size of the allocation had been overstated due to the presence of a ditch and pond and overlapped with other areas of land. | Caroline McDonald – (Rep ID: 439) |

### Policy WLP7.17 – Land West of Lock’s Road, Westhall

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – It was stated that existing infrastructure is not sufficient to accommodate the prosed development and that the listed services for the village are either closed or have uncertain futures.</td>
<td>Westhall Parish Council – (Rep ID: 504, 505, 508, 511)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – There were concerns that most of the development would not face the recreation ground to the west.</td>
<td>Westhall Parish Council – (Rep ID: 512)</td>
</tr>
</tbody>
</table>
Housing

Housing

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main issue 1:</strong> It was asserted that the local plan does not comply with National Planning Policy.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 951)</td>
</tr>
</tbody>
</table>

Policy WLP8.1 Housing Mix

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was contended that the housing mix should not be prescribed based on the Strategic Housing Market Assessment but be determined on an individual basis according to local requirements.</td>
<td>Gladman Developments Limited (Richard Crosthwaite) (Rep ID: 784); Bidwells (Darren Cogman) (Rep ID: 561); Tim Basey-Fisher (John Long Planning) (Rep ID: 598); Lark fleet (Strategic Planning Research Unit - DLP Planning) (Rep ID: 931);</td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> It was suggested that restrictions on second homes should be included.</td>
<td>Christine Silver (Rep ID: 257)</td>
</tr>
<tr>
<td><strong>Main issue 3:</strong> It was suggested that the policy should be clearer on how it applies to Affordable Housing and market housing.</td>
<td>Benacre Company (Lucinda Hutson) (Savills UK Ltd) (Rep ID: 396); Southwold and Reydon Society (Philip O’Hear) (Rep ID: 671); Reydon Parish Council (Jean Brown) (Rep ID: 702) Tim Basey-Fisher (John Long Planning) (Rep ID: 598);</td>
</tr>
<tr>
<td><strong>Main issue 4:</strong> It was asserted that the policy should be more precise and enforceable.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 947, 950)</td>
</tr>
<tr>
<td><strong>Main issue 5:</strong> Concerns were raised relating to planning permissions achieving the housing mix.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 947, 971)</td>
</tr>
</tbody>
</table>

Policy WLP8.2 Affordable Housing

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was contended that the policy is</td>
<td>Lark fleet (Strategic Planning Research Unit - DLP)</td>
</tr>
</tbody>
</table>
### Main Issue

**Main Issue 1:** It was contended that the policy is inconsistent with national policy, unjustified and ineffective. It was recommended that the policy be made more flexible.

**Representations**

- Lark fleet (Strategic Planning Research Unit - DLP Planning) (Rep ID: 933);
- Home Builders Federation (Mark Behrendt) (Rep ID: 815);
- Richborough Estates Ltd (Russell Crow) (Brown & Co) (Rep ID: 697);
- Gladman Developments Limited (Richard Crosthwaite) (Rep ID: 786)

**Main Issue 2:** It was argued that the policy is over reliant on large developments and unlikely to be effective.

**Representations**

- James Houchen (Rep ID: 363)

**Main Issue 3:** It was contended that the policy should reference the requirement for Habitats

**Representations**

- Natural England (Rep ID: 764)
<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulations Assessment.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 4</strong>: It was suggested that guidelines and clarity around self and custom build should be included in the local plan.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 955)</td>
</tr>
</tbody>
</table>

**Policy WLP8.4 Conversion of Properties to Flats**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that the policy should reference the requirement for Habitats Regulations Assessment.</td>
<td>Natural England (Rep ID: 765)</td>
</tr>
</tbody>
</table>

**Policy WLP8.5 Gypsy and Traveller Sites**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that the policy should reference the requirement for Habitats Regulations Assessment.</td>
<td>Natural England (Rep ID: 766)</td>
</tr>
</tbody>
</table>

**WLP8.6 – Affordable Housing in the Countryside**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that Policy WLP8.6 Affordable Housing in the Countryside should be extended to apply to Reydon.</td>
<td>Southwold and Reydon Society (Phillip O’Hear) (Rep ID: 672); Reydon Parish Council (Jean Brown) (Rep ID: 704)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 767)</td>
</tr>
</tbody>
</table>

**WLP8.7 – Small Scale Residential Development in the Countryside**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 768)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: It was argued that the three house limit is an arbitrary restriction.</td>
<td>Gladman Developments Limited (Richard Croswaite) (Rep ID: 787)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong>: It was noted that the NPPF does not require local communities to provide</td>
<td>Gladman Developments Limited (Richard Croswaite) (Rep ID: 787)</td>
</tr>
<tr>
<td>Main Issues</td>
<td>Representations</td>
</tr>
<tr>
<td>-------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>support.</td>
<td></td>
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</tbody>
</table>

**Main Issue 4:** It was argued that it was wrong for even small housing developments to result in the loss of agricultural land required for feeding the population.  
Bruce James (Rep ID: 926)

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**WLP8.8 – Rural Workers Dwellings in the Countryside**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 769)</td>
</tr>
</tbody>
</table>

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**WLP8.9 – Replacement Dwellings and Extension in the Countryside**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 770)</td>
</tr>
</tbody>
</table>

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**WLP8.10 – Residential Annexes in the Countryside**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 771)</td>
</tr>
</tbody>
</table>

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**WLP8.11 - Conversion of Rural Buildings to Residential Use**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that the policy should ensure sites within Flood zone 2 or 3 undertake a site specific FRA. The Exception Test needs to be passed.</td>
<td>Environment Agency (Rep ID: 731)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the policy should reference the requirement to be subject to Habitats Regulations Assessment (HRA).</td>
<td>Natural England (Rep ID: 772)</td>
</tr>
</tbody>
</table>
## Employment

### Policy WLP8.12

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was suggested that the overall intent of the policy was not clear within the policy and could be reworded more positively.</td>
<td>Amber Real Estate Investments Limited (Pegasus Group)(Rep ID: 623)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: It was stated that the existing employment area of the former Bernard Matthews site in Holton should be adjusted to cover the operational area of the site.</td>
<td>Amber Real Estate Investments Limited (Pegasus Group)(Rep ID: 624)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong>: It was suggested that an additional existing employment area was identified for land to the southwest of the railway station in Halesworth which comprised single-storey workshops and a maltings.</td>
<td>Halesworth Town Council (N Rees)(Rep ID:958)</td>
</tr>
</tbody>
</table>

### Policy WLP8.13 – New Employment Development

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that the policy was too strict and could undermine the ability of existing businesses to expand outside of existing employment areas.</td>
<td>Amber Real Estate Investments Limited (Pegasus Group)(Rep ID: 625)</td>
</tr>
</tbody>
</table>

### Policy WLP8.14 – Conversion and Replacement of Rural Buildings for Employment Use.

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was stated that buildings being converted for employment use should be accompanied by a site specific FRA when they are located in Flood Zone 2 or 3.</td>
<td>Environment Agency (Rep ID: 732)</td>
</tr>
</tbody>
</table>
## Tourism

### Policy WLP8.15 – New Self Catering Tourist Accommodation

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that the policy should be amended to refer to enhancement/expansion of existing self catering tourist accommodation.</td>
<td>Bourne Leisure Ltd (Lichfields) (Rep ID: 599)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was argued that the policy should be made more flexible with respect to cycle storage.</td>
<td>Bourne Leisure Ltd (Lichfields) (Rep ID: 599)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was contended that the policy should make reference to vulnerability of some types of accommodation to flood risk.</td>
<td>Environment Agency (Rep ID: 734)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was asserted that the para. 8.84 should include reference to the Broads.</td>
<td>Broads Authority (Natalie Beal) (Rep ID: 165)</td>
</tr>
</tbody>
</table>

### Policy WLP8.16 – New Hotels and Guest Houses

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that the policy should broaden support for new build hotels and guesthouses throughout the district.</td>
<td>Benacre Company (Savills UK Ltd) (Rep ID: 399)</td>
</tr>
</tbody>
</table>

### Policy WLP8.17 – Existing Tourist Accommodation

No main issues.

### Retail and Town Centres

### Policy WLP8.18 – New Town Centre Use Development

<table>
<thead>
<tr>
<th>Key Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that evidence supporting the 350 square metre retail impact threshold was flawed because it did not consider this proposed test against key considerations</td>
<td>Tesco Stores Ltd. (Martin Robeson Planning Practice) (Rep ID: 516); Brookhouse Group Ltd. (Savills) (Rep ID 607);</td>
</tr>
<tr>
<td>Key Issue</td>
<td>Representations</td>
</tr>
<tr>
<td>-----------</td>
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</tr>
<tr>
<td>listed in the NPPG. In addition none of the town centres within the District were considered vulnerable and in need of a lower impact test threshold. Impact tests relating to a large out of town scheme (7,764 square metres) on the edge of Lowestoft indicated negligible impact on the town centre, which means that a lower threshold is not necessary.</td>
<td></td>
</tr>
<tr>
<td><strong>Main issue 2:</strong> It was considered that extensions to Beccles town centre boundary and primary shopping area should include the Tesco car park. A minor change to the proposals map was also sought.</td>
<td>Tesco Stores Ltd. Martin Robeson Planning Practice (Jessica Ferguson) (Rep ID: 516);</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was considered that the Local Plan should contain clear guidance about the change of use from offices to houses within town centres so as to protect the vitality and viability of town centres.</td>
<td>Halesworth Town Council (Nick Rees) (Rep ID: 954);</td>
</tr>
</tbody>
</table>

**Policy WLP8.19 – Vitality and Viability of Town Centres**

No Main Issues.

**Policy WLP8.20 – Local Shopping Centres**

No Main Issues

**Sustainable Transport**

**Policy WLP8.21 – Sustainable Transport**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Concern was raised that there is no specific policy provision in the plan for the protection of Public Rights of Way.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 586)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested the policy should be amended regarding thresholds for transport statements, transport assessments and travel</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 586)</td>
</tr>
</tbody>
</table>
Main Issues | Representations
---|---
**Main Issue 3:** It was stated that the policy should acknowledge that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. | Gladman Developments Limited (Richard Crosthwaite) (Rep ID: 791)

**Community Services and Facilities**

**Policy WLP8.22 - Built Community Services and Facilities**

Main Issues | Representations
---|---
**Main Issue 1:** An objection was raised that the policy was over restrictive towards changes of use for public services. | NHS Property Services – (Rep ID: 968)

**Policy WLP8.23 - Protection of open space**

Main Issues | Representations
---|---
**Main Issue 1:** It was stated that Site 55, Land between Pilgrams Way and Wingfield Street, Bungay should not be designated as open space as it is not publicly accessible and is not used. The landowners would support a mixed use scheme incorporating residential and open space development to make use of the site. | Halsbury Homes (Pegasus Group) – (Rep ID: 806)

**Climate Change**

**Introduction**

Main Issues | Representations
---|---
**Main Issue 1:** It was asserted that para 8.127 should include reference to the historic environment. | Historic England (Rep ID: 881)
### Policy WLP8.24 - Flood Risk

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was argued that reference to guidance on the design and management of sustainable drainage systems should be added.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 543)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested that the findings of the level 2 SFRA should be included in site allocation policies.</td>
<td>Environment Agency (Rep ID: 737)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that reference to links between green infrastructure, good design and the historic environment should be added in para. 8.136</td>
<td>Historic England (Rep ID: 883)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was asserted that the local plan should require solutions to flood risk at the start of the planning application process.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 961)</td>
</tr>
</tbody>
</table>

### Policy WLP8.25 – Coastal Change Management Area

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested that the text made reference to the Benacre Management Project.</td>
<td>Kessingland Parish Council (Donna Lee) (Rep ID: 322)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was suggested there needs to be a facility to update the Coastal Change Management Area on the Policies Map.</td>
<td>Environment Agency (Rep ID: 739)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that in paragraph 4 of the policy “require a coastal location” should be deleted.</td>
<td>Environment Agency (Rep ID: 739)</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was stated that the Shoreline Management Plan should inform the evidence base for planning in coastal areas and the local plan should also take Marine Plans into account.</td>
<td>Natural England (Rep ID: 759)</td>
</tr>
</tbody>
</table>

### Policy WLP8.26 – Relocation and Replacement of Development Affected by Coastal Erosion

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was suggested that the text made reference to the Benacre Management Project.</td>
<td>Kessingland Parish Council (Donna Lee) (Rep ID: 323)</td>
</tr>
<tr>
<td>Main Issue</td>
<td>Representations</td>
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<tr>
<td>---------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Project.</td>
<td></td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: Concern was raised that the policy is impractical for some commercial and business users due to relocation costs and rollback will not be utilised.</td>
<td>Environment Agency (Rep ID: 740)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong>: It was stated that the policy should reference the requirement for Habitats Regulations Assessment.</td>
<td>Natural England (Rep ID: 773)</td>
</tr>
</tbody>
</table>

**Policy WLP8.27 – Renewable and Low Carbon Energy**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: An additional policy criteria was requested in order to avoid impacts on the landscapes of the Broads and AONB. Reference to the Broads’ Landscape Sensitivity Study was requested.</td>
<td>Broads Authority (Natalie Beal) (Rep ID: 166)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: Additional supporting text explaining special considerations for heritage assets beyond designated heritage assets was requested.</td>
<td>Historic England (Rep ID: 885)</td>
</tr>
</tbody>
</table>

**Policy WLP8.28 – Sustainable Construction**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was suggested that any optional technical standards need to be fully justified.</td>
<td>Gladman Developments Limited (Richard Crosthwaite) (Rep ID: 792)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: It was questioned whether the policy relates to existing buildings and heritage assets.</td>
<td>Historic England (Rep ID: 888)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong>: Greater emphasis was requested on better insulation to reduce energy requirements.</td>
<td>Halesworth Town Council (N Rees) (rep ID: 960)</td>
</tr>
<tr>
<td><strong>Main Issue 4</strong>: It was suggested that the use of the phrase “where practical” makes it easy for developers to avoid responsibilities and the policy should be reworded.</td>
<td>Halesworth Town Council (N Rees) (rep ID: 960)</td>
</tr>
</tbody>
</table>
### Design

#### Policy WLP8.29 – Design

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> Reservations were noted regarding referral to external documents or standards. It was suggested that the Building for Life 12 principles are incorporated into the policy.</td>
<td>Lowestoft Town Council (Shona Bendix) (Rep ID: 903)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that failure to differentiate between polite and vernacular architecture will support poor quality design and impede creative design. It was suggested reference to detailing should be deleted and replace ‘vernacular’ with ‘local character’.</td>
<td>Lowestoft Town Council (Shona Bendix) (Rep ID: 903)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was suggested that the policy wording needs to be strengthened to be effective in accordance with national policy.</td>
<td>Halesworth Town Council (N Rees) (Rep ID: 953)</td>
</tr>
</tbody>
</table>

#### Policy WLP8.30 – Design of Open Spaces

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was requested that open space was defined to ensure it specifically references public open space and not all open space.</td>
<td>Bourne Leisure Ltd (Rep ID: 604)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that the policy should be clarified that it refers to green open spaces rather than urban spaces.</td>
<td>Lowestoft Town Council (Shona Bendix) (Rep ID: 904)</td>
</tr>
</tbody>
</table>

#### Policy WLP8.31 – Lifetime Design

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was stated that dementia friendly design principles should apply to non-residential development as well as residential development.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 496)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was stated that 100% of dwellings should be required to achieve M4(2)</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 496)</td>
</tr>
</tbody>
</table>
Main Issues | Representations
---|---
standards. |  
**Main Issue 3**: Concern was raised regarding the intention to require optional technical standards for new residential development and the lack of evidence/justification for 40% of dwellings to be built to M4(2) standards. | Gladman Developments Limited (Richard Crosthwaite) (Rep ID: 793);
Home Builders Federation (Mark Behrendt) (Rep ID: 817);
Larkfleet Homes (Rep ID: 934)

**Policy WLP8.32 – Housing Density and Design**

No main issues.

**Policy WLP8.33 – Residential Gardens and Urban Infilling**

No main issues.

**Natural Environment.**

**Policy WLP8.34 – Biodiversity and Geodiversity**

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – It was stated that there is no evidence for the County Wildlife site near the entrance to Lowestoft Harbour. It was added that the protection for the Kittiwake colony provided by WLP2.2 was sufficient.</td>
<td>Associated British Ports – (Rep ID: 554)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – It was stated that the policy should make reference to the mitigation hierarchy in order to avoid harm to the environment except where development provides significant benefits.</td>
<td>Natural England – (Rep ID: 761)</td>
</tr>
</tbody>
</table>
| **Main Issue 3** – It was stated that the policy should make reference to developments providing ecological enhancements, as well as mitigation and/or compensation measures, to achieve net gains for the environment. | Natural England – (Rep ID: 761)
Suffolk Wildlife Trust – (Rep ID: 267) |
| **Main Issue 4** – It was raised that the requirement for ‘suitable mitigation measures’ should be strengthened. | Halesworth Town Council – (Rep ID: 959) |
### Policy WLP8.35 - Landscape Character

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
</table>
| **Main Issue 1** – There was concern that relying on national planning policy did not afford the 'great weight' required by the NPPF in regards to the protection of the AONB. It was suggested that a separate policy for development within the AONB would be appropriate and that reference should be made to the AONB Management Plan. | Suffolk County Council (AONB Team) – (Rep ID: 380, 381, 384)  
Simon Clack – (Rep ID: 656)  
Reydon Action Group for the Environment – (Rep ID: 736)  
Suffolk Preservation Society – (Rep ID: 314)  
Natural England – (Rep ID: 762) |
| **Main Issue 2** – There was concern that no specific mention was made to the preservation of soils. | Natural England – (Rep ID: 762) |
| **Main Issue 3** – It was asked whether applications with an impact on the Broads could be accompanied by a Landscape Visual Impact Assessment. | Broads Authority – (Rep ID: 176) |
| **Main Issue 4** – It was stated that reference to other studies and documents should be strengthened. | Broads Authority – (Rep ID: 176, 178) |

### Policy WLP8.36 - Coalescence of Settlements

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – It was suggested that a criteria based approach would be more useful for this policy as it would allow more potentially sustainable areas to come forward.</td>
<td>Gladman Developments Limited – (Rep ID: 794)</td>
</tr>
</tbody>
</table>

### Historic Environment

### Policy WLP8.37 – Historic Environment

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
</table>
| **Main Issue 1**: It was considered that paragraph 8.210 should make reference to the archaeological value of The Broads. | Broads Authority (Natalie Beale) (Rep ID: 182);  
Suffolk Preservation Society (Rep ID: 316) |
| **Main Issue 2**: It was suggested that the text and | |
### Main Issue Representations

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Terminology of the policy and supporting text must more closely reflect that of the NPPF. In particular the terms ‘significance’, ‘harm’, and ‘public benefit’ should be included. The term ‘protect’ should not be included because it is outdated.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 3:</strong> It was considered that guidance contained in policies 8.37 to 8.40 should reflect the guidance set out in NPPF paragraphs 126-141, in particular that contained in paragraphs 133 and 134.</td>
<td>Gladman Developments (Rep ID: 795); Historic England (Rep ID: 898);</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was considered that the policy should better reflect the changing requirements on applicants to assess heritage impact depending on the type of application and the assets affected.</td>
<td>Historic England (Rep ID: 905);</td>
</tr>
<tr>
<td><strong>Main Issue 5:</strong> It was considered that reference to the Built Heritage and Design SPD should be removed unless it is revised to include the role of heritage in delivering regeneration and development. Arbitrary scoring mechanisms should also be removed.</td>
<td>Lowestoft Town Council (Rep ID: 912);</td>
</tr>
</tbody>
</table>

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### Policy WLP8.38 – Non-Designated Heritage Assets.

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that guidance contained in policies 8.37 to 8.40 should reflect the guidance set out in NPPF paragraphs 126-141, in particular that contained in paragraph 135.</td>
<td>Gladman Developments (Rep ID: 796);</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was considered that the meaning of ‘compatible’ was unclear with regard to fabric and setting. It was also unclear how demolition requirements would be enforced.</td>
<td>Lowestoft Town Council (Rep ID: 913);</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was considered that there needed to be an explanation of the difference between listed and locally listed buildings.</td>
<td>Historic England (Rep ID: 914, 923);</td>
</tr>
<tr>
<td><strong>Main Issue 4:</strong> It was considered that policy and</td>
<td>Historic England (Rep ID: 917, 919, 923);</td>
</tr>
</tbody>
</table>
Main Issue | Representations
--- | ---
supporting text still treated non-designated heritage assets only as locally listed buildings. Examples of other types of heritage assets are needed. | 

**Policy WLP8.39 – Conservation Areas**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that guidance contained in policies 8.37 to 8.40 should reflect the guidance set out in NPPF paragraphs 126-141.</td>
<td>Gladman Developments (Rep ID: 797)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was considered unclear how ‘visual significance’ related to historic and architectural interest and the application of the statutory duty for conservation areas.</td>
<td>Lowestoft Town Council (Rep ID: 915)</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was stated that it was unclear whether all the criteria for non-listed buildings in a conservation area had to be met. It was considered that the policy did not differentiate in its approach to buildings of different merits.</td>
<td>Historic England (Rep ID: 921);</td>
</tr>
</tbody>
</table>

**Policy WLP8.40 - Archaeology**

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that paragraph 8.226 should make reference to the archaeological value of The Broads.</td>
<td>Ms. Natalie Beale (Rep ID: 226);</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was considered that the requirements for the preservation and recording of archaeological remains were excessive. These should be proportionate to the importance of the archaeological remains.</td>
<td>Suffolk County Council (Robert Feakes) (Rep ID: 527).</td>
</tr>
<tr>
<td><strong>Main Issue 3:</strong> It was considered that guidance contained in policies 8.37 to 8.40 should reflect the guidance set out in NPPF paragraphs 126-141.</td>
<td>Gladman Developments (Rep ID: 798)</td>
</tr>
</tbody>
</table>
Appendix 1 – Infrastructure and Delivery Framework

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong> – It was stated that the section for WLP2.16 in Table A1.1 does not acknowledge the impact on the Scheduled Ancient Monument, impact on roads or the Lowestoft Flood Risk Mitigation Strategy. These should be included.</td>
<td>Julian Rogers – (Rep ID: 231)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong> – It was commented that reference should be made to the Benacre/Kessingland Flood Risk Project in Table A1.2</td>
<td>Suffolk County Council (Robert Feakes) – (Rep ID: 567)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong> – It was stated, specifically in reference to WLP2.16, that contributions to the improvements to infrastructure such as GP surgeries and junctions should only be sought where the development meets the tests set out in paragraph 204 in the National Planning Policy Framework.</td>
<td>Meridian Strategic Land (JCN Design and Planning) – (Rep ID: 780)</td>
</tr>
</tbody>
</table>

Appendix 2 – Monitoring Framework

No main issues.

Appendix 3 – Housing and Employment Land Summary and Trajectory

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was suggested that the rate of development shown in the housing trajectory would not be realised.</td>
<td>Mr Lambert (Rep ID: 104) Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID:216)</td>
</tr>
</tbody>
</table>

Appendix 4 – Marketing Requirements

No main issues.
## Appendix 5 – Viability Assessment Requirements

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1</strong>: It was suggested that any claw back clause should be reviewable by both parties and result in increases or decreases in contributions.</td>
<td>Mr Lambert (Rep ID: 102)</td>
</tr>
<tr>
<td><strong>Main Issue 2</strong>: It was suggested that the costs section needs to include service costs and overheads and garage costs could be itemised separately from external works.</td>
<td>Mr Lambert (Rep ID: 103)</td>
</tr>
<tr>
<td><strong>Main Issue 3</strong>: Concerns were raised with respect to some of the assumptions relating to sales values and land values in the Whole Plan Viability Assessment.</td>
<td>Mr Lambert (Rep ID: 105); Badger Building (E.Anglia)Ltd (Edward Gilder)(Rep ID:213) Badger Building (E.Anglia)Ltd (Edward Gilder) (Rep ID:214)</td>
</tr>
<tr>
<td><strong>Main Issue 4</strong>: Concern was raised that the approach to Threshold Land Value does not adequately reflect the planning practice guidance and the recent judgement, Parkhurst Road Ltd v Secretary of State for Communities and Local Government and London Borough of Islington.</td>
<td>Oldman Homes (Bidwells) (Rep ID:744)</td>
</tr>
<tr>
<td><strong>Main Issue 5</strong>: Concern was raised over the requirement to use BCIS build costs and the use of 5% contingency. It was suggested that QS reports would be preferable.</td>
<td>Oldman Homes (Bidwells) (Rep ID:744)</td>
</tr>
<tr>
<td><strong>Main Issue 6</strong>: It was suggested that the independent reviewer of viability assessments should be jointly appointed by the Council and the Developer. It was suggested that prior to the revised NPPF being published the Council should keep viability reports confidential.</td>
<td>Oldman Homes (Bidwells) (Rep ID:744)</td>
</tr>
</tbody>
</table>
### Appendix 6 – Criteria for the identification of non-designated heritage assets that are buildings

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that the criteria for identifying locally listed buildings should be prepared in accordance with heritage legislation.</td>
<td>Lowestoft Town Council (Shona Bendix) (Rep ID: 920);</td>
</tr>
</tbody>
</table>

### Appendix 7 – Landscape Character

No main issues.

### Appendix 8 - Glossary

<table>
<thead>
<tr>
<th>Main Issue</th>
<th>Representations</th>
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</thead>
<tbody>
<tr>
<td><strong>Main Issue 1:</strong> It was considered that several entries within the glossary were inaccurate. Entries identified included active frontages, conservation areas, listed buildings and neighbourhood plans.</td>
<td>Lowestoft Town Council (Shona Bendix) (Rep ID: 922)</td>
</tr>
<tr>
<td><strong>Main Issue 2:</strong> It was considered that conservation areas, listed buildings, registered parks and gardens and scheduled monuments should be identified as designated heritage assets. Historic environment should also be defined in the glossary.</td>
<td>Historic England (Rep ID: 925);</td>
</tr>
</tbody>
</table>
Appendix 1 – Analysis of Responses to the Options for the new Waveney Local Plan (2016) Consultation

This section of the document explains how the Council took into account comments raised during the Options for the new Waveney Local Plan (2016) Consultation when writing the First Draft Local Plan consultation (2017)

Analysis of Responses to Questions on Strategy Options and Policy Topics

The ‘Options for the new Waveney Local Plan’ consultation asked a total of 101 questions on different planning policy topics to help inform the preparation of the Local Plan. The response to these questions are summarised below, together with a summary of how the Council has taken those responses into consideration in the preparation of the First Draft Local Plan.

Key Issues

2 respondents
The Broads Authority stated that the Area of Outstanding Natural Beauty and the Broads are not necessarily issues. They argued that the term issue implies a negative. They stated that the chapter could be renamed ‘Key Considerations’.

The Environment Agency stated that they were pleased to see that environmental issues have been included in the key issues section and they fully agree with the points currently made. They suggested the inclusion of water resources could be included into this section as a key environmental issue for the area. They noted there was no mention supporting the protection of groundwater and aquifers.

How these comments have been taken into account in the First Draft Local Plan

The Council disagrees that the term ‘issue’ implies a negative, they are specific matters local to Waveney which the plan needs to take into account of.

A key issue relating to water stress has been added into the First Draft Local Plan.
Vision

Q01 a) What is good about living or working in Waveney now? b) What is good about living or working in the town or village you live in? (56 respondents) Q02 a) What is not so good about living and working in Waveney now? b) What is not so good about living or working in the town or village you live in? (47 respondents) Q03 a) What is your vision for Waveney by 2036 and what are the key priorities that need to have been addressed by 2036? b) What are your vision and priorities for your town or village? (57 respondents)

Statutory Consultees

The Broads Authority stated that the Broads should be mentioned in the vision. The Environment Agency state that their focus over the plan period is to protect, maintain and enhance the natural environment in Waveney and the surrounding area; and, ensure environmentally sustainable development. Their key priorities will be to improve biodiversity, protect and improve the regeneration of groundwater, support good waste management, endure new developments are resilient to climate change, and improve water quality.

Historic England stated that the vision for the district should make reference to the rich historic environment of the District and the need to develop a strategy for the conservation and enjoyment of this environment. In particular the vision should relate to the distinctiveness of the district, including that of its historic environment.

Natural England advised that the Plan’s vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. They advised that where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies.

Parish and Town Councils

Beccles Town Council stated that road infrastructure in the area is poor and not fit for purpose. There is inadequate pedestrian and cycle access to the existing Ellough employment areas and no bus service at all.

For question 1 Carlton Colville Town Council mentioned the semi-rural aspect.
For question 2 Carlton Colville Town Council mentioned the continual building of new estates without a corresponding increase in infrastructure or jobs or social facilities.

Corton Parish Council mentioned disjointed approach to the Lowestoft area due to a lack of Parish Council. They stated that Ness Point is an embarrassment with dreadful access and dogs mess. They raised concern about major shops closing.
For question 1, Frostenden, Uggeshall & South Cove Parish Council noted the lovely countryside. For question 2, Frostenden, Uggeshall & South Cove Parish Council noted house price inflation and lack of facilities locally in the Parish. Frostenden, Uggeshall & South Cove Parish Council stated the key priorities should be the regeneration of Lowestoft and Great Yarmouth and the third river crossing for Lowestoft. For the Parish, their vision is to create a better sense of community.

For question 1, Ilketshall St Margaret Parish Meeting noted the low crime levels, natural environment and local facilities in Bungay. For question 2, Ilketshall St Margaret Parish Meeting noted the lack of job opportunities for young people, coastal erosion and flood risk. They also noted the removal of public transport from the Parish and the speed and availability of Broadband. Ilketshall St Margaret Parish Meeting stated that there should be a variety of businesses offering job opportunities and a secure protected environment. For their Parish, their vision is a community that continues to thrive, where the residents feel safe and there are transport links into the town. Also where those businesses located in the village can function effectively on-line.

Kessingland Parish Council noted the loss of young families which leave for better employment opportunities, the lack of public transport, the lack of community facilities, and the lack of affordable housing. Kessingland Parish Council stated that their vision is for Kessingland to be an easily accessible village, a place with improved inclusivity, a place where young people can stay when they grow up, has more affordable housing, improved infrastructure and new businesses.

For question 1, Lound Parish Council noted that residents agreed that it was a peaceful and friendly place to live with good community spirit. Lound Parish Council noted the lack of shops, and poor public transport provision in the village. Lound Parish Council stated that the general expressed vision for the village is that it should remain as it is now, with only organic growth that doesn’t change the character of the village.

Southwold Town Council noted the following issues with respect to the District:

- Poor public transport connecting villages and towns and London;
- Broadband is not as good as it should be for working purposes;
- Discouraged from using Lowestoft because of bridge access issues;
- Lack of well paid jobs – overdependence on tourism;
- Lack of facilities for knowledge based businesses;
- In Waveney, especially Lowestoft, state education is not as good as it should and could be;
- Lack of maintenance of footpaths, green spaces, including litter;
- Loss of community hospital provision.

With respect to Southwold they noted the following:

- Lack of facilities for knowledge based businesses and community assets
- High rents which discourage independent businesses, small businesses and start-up businesses
- Lack of affordable homes
- Lack of rental accommodation at a reasonable price for people whose income does not qualify them for affordable social housing.
- 57% of housing is second homes/holiday lets
- Declining and elderly/very elderly population
• Lack of volunteers undermining essential services and civic life
• Inadequate parking system – too many cars in town during high season. Pavements and streets not safe for pedestrians/cyclists.
• Over-dependence on tourism
• Too many people using the town in the summer without the physical facilities and resources to service them and maintain the town.
• Difficulty of recruiting employees because of lack of affordable housing and poor public transport system.

Southwold Town Council stated their vision for Waveney is for more knowledge based industry, more affordable housing, better education, better public transport, better broadband, third crossing, better protection of the environment, and better design. For Southwold they stated their vision is to integrate knowledge based business in the town centre, more affordable homes, restrict and discourage second homes, affordable retail and businesses uses, new community facilities, high quality design, extend the conservation area to parts of North Road, more off-road parking, better cycling routes, better public transport and better management of parking and traffic.

Southwold Town Council mentioned the following qualities; nature and landscape; picturesque villages and market towns; the sea; good quality local food; strong sense of community and independent businesses market towns, local produce, access to Norwich, cultural and leisure activities, voluntary sector, safe, low crime rate. In respect of the Parish area they noted low density housing, lots of space, rural, peaceful, good community spirit and concern for the environment.

Three Saints Parish Council noted the largely unspoilt rural environment and that the area is generally friendly and tolerant. They noted good access to the coast and countryside, thriving. Three Saints Parish Council noted the lack of good quality jobs and lack of affordable housing. They noted increasing traffic and a growing number of second home owners. They also mentioned an over reliance on car use and poor public transport. Three Saints Parish Council stated that their vision for Waveney was to protect the rural character of the area and ensure market towns continue to thrive. They stated a need to provide affordable housing and jobs and have more concern for the environment and sustainability. They stated that the reliance on car should be reduced and local services and facilities should be as local as possible. For the Three Saints area, the Parish Council stated that their vision is to protect the rural, unspoilt character of the villages with scattered housing. They stated that development should be limited and sympathetic to the environment and community involvement should be improved, roads should be safe with greater protection for the environment and wildlife.

Other Organisations

The Halesworth & Blyth Valley Partnership stated they would welcome an increase in affordable housing and industrial development, together with improved infrastructure including health care and education.

Southwold & District Chamber of Trade & Commerce stated the vision should reflect the value of Southwold and Reydon to the wider area. They stated that in formulating the plan, it will be important to
gain a balance between the needs of residents and the needs of the economy and that it is essential to retain the character of the area. They stated that if the right balance is achieved, Southwold and Reydon will be a vibrant community to live in, to work in and to visit.

Southwold and Reydon Society noted that we live in an area of great beauty with a varied and outstanding natural environment. Southwold and Reydon Society also noted the significant deprivation in the District, particularly in Lowestoft. They noted the low pay sectors of tourism which many people in Southwold and Reydon are employed in. They also noted that local people are priced out of the local housing market. Southwold and Reydon Society stated they want to see a more vibrant local economy, taking full advantage of the opportunities arising from off-shore wind but also seeking to expand knowledge-based businesses in the area, including in small towns and villages like Southwold and Reydon. They stated the need for more housing, particularly, affordable housing, is needed in Southwold and Reydon in order to maintain a balanced and sustainable community. The Society stated that their vision is to preserve and protect the character and amenity of the community and environment but acknowledging that cannot be achieved by allowing it to stand still. They acknowledged there are challenges to be faced in balancing the needs and interests of visitors and temporary residents with that of the resident population, ensuring that enough younger people and families live in our area to support the needs of the ageing population, opportunities for employment including in the knowledge economy, and provision of infrastructure. They stated that the protection of our natural environment, including managing the risks and consequences of coastal erosion, must be balanced with the need to accommodate a growing population and the creation of a wider range of employment. Failure to meet these challenges will result in an unsustainable community and thus undermine the features of our area that we wish to preserve.

Developers/Landowners

Badger Building stated that the District provides an attractive and relatively cheap location to live in. There is easy access to Norwich or to open countryside and the Broads. They mentioned that Lowestoft is a compact town and provides a good range of services. Bungay, Beccles and Halesworth have all retained a degree of local character and charm. Badger Building stated that parts of the District are unaffordable (e.g. Southwold) and the problem is spreading to market towns due to restrictive planning policies. They also stated that parts of the District are very remote and that jobs growth has been slow employment opportunities are limited and educational aspiration and achievement are low. Badger Building stated that the housing market would benefit from a number of allocations around the district – not a highly concentrated allocation in Lowestoft and with proper consideration given to the likelihood of delivery.

Larkfleet homes stated that primary aspects which are valued by many local residents are the rural character of the area including its coastline, the Broads and the special landscape in particular of the Waveney and Blyth river valleys. They also mentioned the rich built heritage. Larkfleet Homes stated that residents’ primary concerns were the availability of both jobs and homes, of issues of social deprivation and the lack of community facilities and infrastructure. They went on to state that particular concerns exist for ‘first time buyers’, young families and elderly residents seeking to ‘downsize’. Larkfleet Homes stated that the Vision should state clearly what the aspirations for the District are and lead to clearly defined objectives to achieve this. They stated that the vision for the Local Plan must seek to support both a
substantial level of new housing growth and support and encourage significant economic growth in the area. With respect to Beccles, they state that 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.

Rentplus recommend that the following wording be included in the Local Plan vision to reflect the intention of the NPPF and Government agenda focused on extending opportunities for home ownership: “Enable the delivery of an appropriate mix of market, affordable housing and rent to buy homes that are suitable in tenure, type, size and location to meet identified housing need.”

St John’s Hall Farms stated their vision for Waveney in 2036 is that it should be an economically prosperous place, with opportunities for businesses to thrive and grow, supported by infrastructure such as housing, transport, education and communication networks. Each of the main towns should operate as far as possible, as self-sustaining communities, but acknowledging that jobs may not always be in the same town; and people will always have to travel to access certain types of jobs and facilities such as health, leisure and further education. They suggested the key priorities that need to be addressed are; providing opportunities for job growth, access to new housing, high attaining education establishments; and ensuring infrastructure keep pace with job and housing growth. For Bungay they stated that their vision is that it will, as far as possible, be a self-sustaining town, with a range of job opportunities; top rated education facilities; first class health and social services facilities; a thriving town centre and other retail facilities such as medium scale; good quality transport links and a range of housing.

Members of the public mentioned the following qualities about the District and their local place:

- Balanced mix of urban and rural places
- Tranquillity and scenery of the countryside
- Area of Outstanding Natural Beauty
- Favourable climate
- Market towns
- Country lanes
- Pretty villages
- Low crime rates / safe places
- Sense of community
- Friendly people
- Employment opportunities
- Good variety of shops
- Low population density
- Adequate infrastructure
- Parks
- Cycle paths
- Local theatres
- Access to Hospital
- Train services to London
- Barnby – attractive, affluent, semi-rural, low crime.
- Beccles – self sufficient and adequate infrastructure for the population, comprehensive range of shops, planned southern relief road.
- Lound – quiet rural village with good views of the countryside, good community spirit, active church, garden entre, pub and café, nearby nature reserve, no crime, public footpaths, horse riding, safe to cycle, wildlife.
- Lowestoft – seaside, Lake Lothing, lifting bridges, Broads, church, nearby countryside, two railways serving the town.
- Reydon – coastline, heathland, near to Southwold,
- Rumbergh – active community life, local pub and village hall.
- Worlingham – close to Beccles, low crime, community feel, pleasant public realm, low density.

Members of the public mentioned the following issues about the District and their local place:

- Limited healthcare facilities
- Obesity
- Ongoing threat from large-scale development
- 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
- Low economic growth and low wages
- Offshore wind could blight coastal views a future grid transmission could impact on the landscape.
- Lack of care of historic assets
- Lack of investment in tourist infrastructure
- Too many supermarkets
- Beccles, transport within the town is becoming an issue, lack of indoor swimming pool.
- Lound – threat of new housing, few passing places on small country roads, traffic through the main street, litter near college(former Lothingland Middle School)
- Lowestoft - parts around London Road South and Station Square that are dilapidated, the state of Ness Point, traffic congestion, shopping is poor, deprivation, less welcoming feel and yobbish behaviour in town centre.
- Rumbergh – poor local provision of some services such as health care. Limited sports facilities in Halesworth, limited local employment, poor broadband, unsafe rural roads, no cycle paths and limited public transport.

Members of the public expressed many different visions for both Waveney and their local towns or villages. Waveney visions included improving educational attainment and aspiration, more jobs and more diverse employment, increased tourist provision, more affordable housing and new and improved infrastructure. In terms of infrastructure members of the public noted they would like to see improved
public transport, improved cycle routes including longer distance links to Norwich, duelling of the A12 and village bypasses. Visions also included 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.

For Lowestoft, visions included the need for more businesses and homes, making use of brownfield sites and the need to attract more wealthy people to the town. It was noted that the town should benefit from offshore wind energy and that the town should have new high quality tourist attractions.

For Beccles, visions outlined the need for more houses, improved retail facilities, diverse industries, improved transport (including cycle routes), a wildlife area on the quay, a new pub on the quay and a pop-up café on the Common.

For Southwold and Reydon it was noted there was little need for further housing apart from affordable and one/two bedroom houses for younger people and those wishing to downsize.

In Lound there was a consensus that the village should continue to be a small, quiet, pleasant village unspoilt by new development. It was noted that any development should be natural growth necessary for the needs of the village.

For Somerleyton it was noted that the character of the village should be preserved whilst not ruling out small scale development.

For Worlingham it was noted that the village should retain its identity and protect the public realm.

**How these comments have been taken into account in the First Draft Local Plan**

The vision for the District and for individual settlements within the First Draft Local Plan has taken into account the comments above on the existing good and bad points about the District and the different visions for the future.
How Much Growth?

Q04 a) Which scenario best represents the 'objectively assessed need' for housing and jobs growth? b) Do you have any evidence to suggest that an alternative figure may be more appropriate?

55 respondents

Statutory Consultees

The Broads Authority recommended that the housing need of the Broads part of Waveney is explained. They stated that this is calculated as 51 dwellings between 2012 and 2036 using the jobs led growth scenario and that this is not additional to, but part of the Waveney objectively assessed need.

The Greater Norwich Local Plan Team suggested that the High Economic Growth Projections scenario (381 houses per year and 5500 new jobs) is the most appropriate for the Local Plan to consider, given that the growth associated with the expansion in the offshore industry seems likely to occur.

Natural England stated that they do not have any specific comments on the three growth scenarios although they raised a general concern about an increased population leading to increased recreational disturbance to designated sites. They stated that Residential developments within 8km driving distance or c.1.5 Km walking distance from designated sites have been shown to attract significant recreational pressure, particularly regular dog walking. It is also likely that an overall increase in population will result in increased recreational impact on sites further afield, including into neighbouring districts. They advised that other authorities locally in Norfolk and Suffolk have and are producing studies on this. They advised that mitigation approaches included the provision of a new country park (to attract general recreation away from designated sites), the provision of green infrastructure within developments (to provide convenient local recreational dog walking facilities), and introducing wardens, monitoring and visitor management schemes for designated sites, funded by developer contributions.

Parish and Town Councils

Ilketshall St Margaret Parish Council stated that Scenario 1 was the most appropriate.

Kessingland Parish Council stated that Scenario 2 was the most appropriate.

Oulton Parish Council stated that Scenario 2 was the most appropriate. They did not consider that Scenario 3 is achievable due to the high expectancy of growth.

Other Organisations

The Lowestoft and Waveney Chamber of Commerce stated that Scenario 3 ‘High Growth Economic Projections’ most accurately reflects Waveney District’s ambition and capacity for growth although the
employment projections should be subject to robust examination so that the housing numbers are driven by local economic growth rather than commuter demands.

Southwold and Reydon Society stated that 4000 new jobs seems an ambitious target so would favour Scenario 1 or 2.

Developers/Landowners

Badger Building stated that in the event that the estimate of additional jobs in the wind farm industry are generated at the rate proposed, then option 3 has to be selected, as it is the only option which is capable of absorbing the growth. They noted that failure to select this option coupled with the jobs growth forecast would see insufficient land allocated for housing and upward pressure on prices. They noted that in the event that the additional jobs are not generated that no harm is done by over allocation as any unused sites can be carried forward to the next review.

Lawson Planning Partnership on behalf of Frostdriver Ltd and the Norfolk & Suffolk NHS Foundation Trust stated that Scenario 3 best represents the objectively assessed need as the National Planning Policy Framework states that planning should ‘proactively drive and support sustainable economic development’.

Gladman Developments advised that the preliminary work undertaken by the Council on objectively assessed needs is reviewed by a qualified demographer. They raised concern that the assumption that Waveney is a self-contained Housing Market Area is overstated as self containment may have been underestimated and only based on migratory flows from 2014-2015 without assessing longer term migratory trends over a longer time period. Gladman raised concern with the use of the 2012 Sub-National Population Projections which do not represent the most up-to-date data. They also raised concern that in applying economic-led population forecasts why the brief was to ‘constrain’ the forecast to the East of England Forecasting Model total and working age populations. They stated that in determining the level of housing and economic need, it is important that these figures are not constrained so that they identify the Council’s full needs. Gladman also raised concern that no upward adjustment has been made to the housing need due to affordability problems in the District. Gladman conclude by stating the housing scenarios consulted upon cannot be considered to be based on appropriate evidence at this time.

Larkfleet Homes stated that the level of housing growth which the Plan seeks to provide for should be significantly higher than the proposed options in order to support economic growth, address issues of previous undersupply and to increase choice, availability and affordability of housing. They also stated that the Council should make more information available as to how their preliminary assessment of objectively assessed need has been arrived at and consider the issues highlighted in their own report on needs. Larkfleet advised that their own assessment undertaken by DLP Planning’s Strategic Planning Research Unit (SPRU) indicates an objectively assessed need of 606 dwellings per annum over the period to 2036. This need is based on jobs growth modelled by Cambridge Econometrics. Larkfleet also noted the following issues with the objectively assessed need:

- There is strong evidence to support a wider housing market area (HMA) which contains both Waveney and Great Yarmouth districts as the migration and travel to work links between
Waveney and Great Yarmouth are strong and support the use of a single ‘Gold Standard’ HMA. The ambitions for the New Anglia LEP are only likely to strengthen the links and therefore the case for a combined HMA.

- There has been no allowance made for vacant or second homes in the household projections calculation
- The 2012 sub-national population projections (SNPP) on which household projections were based are now out of date following the publication of the 2014-based SNPP in May 2016
- Neither of the alternative population forecast scenario applied by the Council runs to 2036 which is the full period for the Local Plan
- In the Cambridge Research Group (CRG) Economy-Led Population forecast scenario, the forecast population shows a decrease in working age population despite being economy led with no explanation for how economic growth can be supported by a decreasing population
- In the Waveney Offshore Economic Scenario, no breakdown of population by working age group is provided so it is not known how economic growth will be supported
- It is not clear if implications of Unattributable Population Change (UPC) has been taken into consideration
- The 2012 SNPP uses migration trends from the previous 5 years (2007 to 2012), which are trends experienced in a recessionary period and the Council have not made appropriate adjustments to take into consideration migration levels in more prosperous periods.
- The 2012 SNPP assume that the present situation of more under 35s staying at home and a greater number of unrelated adults living together (shared housing) will continue.
- There is evidence to support an uplift to OAN in response to market signals of between 11 and 28% which has not been applied

Savills, on behalf of landowners in South Lowestoft and the Benacre Estate, stated that they considered Scenario 3 as the most appropriate. They stated that the National Planning Practice Guidance advises plan makers to take into account employment trends and market signals. They do not consider that scenario 1 is appropriate as employment trends and market signals will not have been fully assessed. They went onto state the importance of considering the impact of investment in offshore wind and other economic developments, noting the significant investment in off-shore wind from both public and private sectors over the last couple of years.

Somerleyton and Sotterley Estates stated that scenario 3 best matches the preliminary objectively assessed need.

St John’s Hall Farms stated that Scenario 3 represents an appropriate growth strategy. They stated by setting an ambitious high growth target, it is a clear statement of intent that Waveney is ‘open for business’ and a forward looking place, which welcomes investment and growth. They went on to state that the Local Plan should plan for more than objectively assessed housing needs; that way should growth exceed expectations, the planning strategy will be robust enough to accommodate it.

Wellington Construction stated that Scenario 3 would cover all the bases and if it turns out to be an overestimate, presumably the next review can be adjusted downwards accordingly.
Members of the Public

The views from members of the public were mixed. 47% felt scenario 1 was most appropriate, 29% felt scenario 2 was most appropriate and 24% felt scenario 3 was most appropriate. Concerns that were raised included:

- Scenario 3 is ‘futurist’ and contains no useable data to support assumptions
- Even scenario 1 seems to overstate the need for housing. House prices will remain high regardless of supply and it is absurd to spoil an area of relative tranquillity for an unproven theory.
- Scenario 3 might overstate the growth needed as the highest level of jobs associated with wind turbines will only be temporary during construction.
- In assessing the number of jobs there is a need to take into account more efficient production processes and employees extending their working life.
- The jobs estimates are too optimistic.
- Better to use ONS than hoped for economic growth. The plan could always be reviewed if more houses are needed to support uncertain economic growth.
- With only 150 houses completed in recent years, a target of over 300 seems very ambitious.
- Scenario 3 should be married with a plan to attract outside investment and make Waveney a destination for young aspirational families.
- It was questioned whether the potential for housing associated with Sizewell been considered.
- If much of the expected population is expected to be of retirement age it should surely be based mainly on population trends.
- Counting on work in the wind power sector is placing all the eggs in one basket.
- Scenario 1 is best because there is so much uncertainty about the impact of the EU vote.
- One respondent states that a need of 2,500 new homes would be appropriate.

How these comments have been taken into account in the First Draft Local Plan

In light of the above comments, the Council commissioned Peter Brett Associates to produce a Strategic Housing Market Assessment to provide an updated and robust view on what the objectively assessed need should be. This work involved considering a number of different forecasts on jobs growth. The study confirmed that Waveney can be considered as its own Housing Market Area and that the objectively assessed need for housing was 375 homes per annum, taking into account demographic trends and a market signals uplift.

Q05 Should we be planning for more or less development than the objectively assessed need?

24 respondents
Statutory Consultees

The Greater Norwich Local Plan Team recommended that the Plan should aim to meet the full objectively assessed need as there is no suggestion that Waveney cannot accommodate it. They also stated that there is no evidence that the three Greater Norwich authorities will not be able to accommodate their own (combined) housing need as identified through the Central Norfolk Strategic Housing Market Assessment.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting stated that probably less than objectively assessed need should be planned for.

North Cove Parish Council stated that Waveney has lost 1000s of jobs in the past 3 decades yet housing has grown hugely. They stated that more emphasis on employment should be given. They also stated that Length of time living in Waveney before going on housing list should be increased considerably over the present 6 months.

Southwold Town Council said they had no comments on the growth scenarios.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Lawson Planning Partnership on behalf of Frostdrive Ltd and the Norfolk & Suffolk NHS Foundation stated that development should be planned for more than the objectively assessed needs to account for any sites that may not come forward as intended and to ensure that the required level of housing and jobs are delivered.

The Somerleyton and the Sotterley Estate stated that at this early stage in the preparation of the plan it would be prudent to aim high and plan positively. They recommend the highest objectively assessed need scenario and a comfortable margin.

Southwold and Reydon Society stated that the Council should be planning for growth which meets the objectively assessed need.

Members of the Public

Most members of the public agreed that the Council should only be meeting objectively assessed needs, not more. Three members of the public stated that the Council should plan for less and one stated the Council should plan for more. One respondent stated that the Council should plan for the type of housing
required by local people not the sort which will attract more people into the area. The need for infrastructure and jobs to keep pace with new homes was also mentioned.

**How these comments have been taken into account in the First Draft Local Plan**
The First Draft Plan makes a slight over-allocation in terms of housing and employment land growth. This is in order to take into account the high need for affordable housing and to provide some flexibility in case some sites do not come forward as planned.

**Q06 Do the figures presented above with respect to retail and leisure needs represent the 'objectively assessed need' for these uses?**
17 respondents

**Statutory Consultees**

Greater Norwich Local Plan Team stated that they assumed the figures disclosed in the Waveney Retail and Leisure Needs Assessment 2016 are the best available and do not have any alternative evidence.

**Parish and Town Councils**

Carlton Colville Town Council stated that there aren’t enough facilities for the existing population.

Ilketshall St Margaret Parish Meeting stated that with the increase in on-line retail and the existing vacant units, the estimated retail need may be in excess of that required, but with the increase in older population, affordable leisure and recreational facilities may need to grow.

**Other Organisations**

The Southwold and Reydon Society stated that in Southwold and Reydon policies which protect the variety of the retail offer in Southwold High Street are needed. They stated that the attractiveness of the High Street is a significant draw for the tourism on which our local economy depends.

** Developers/Landowners**

Badger Building stated that retail assessments have continually overestimated the requirement for retail space based on assumptions about population growth and increased spending and have justified out of town shopping on this basis, to the detriment of town centres. They state that part of this justification is on the basis of existing stores overtrading, which shouldn’t be a problem unless there is undue pressure on car parking or the environment. They went on to state that a multiplex cinema would be a great idea, but the population spread criteria to support one is unlikely to be met, due to the location of the Lowestoft as a coastal town.
Larkfleet Homes stated that the Council’s Retail Needs Assessment is based on the 2012-based SNPP projections. However, this has no regard to the need to plan for economic growth in the District and to support the creation of new jobs, in particular in the off-shore energy sector. Larkfleet’s own evidence suggests much greater population growth and as such follows that the quantitative retail and leisure needs are also likely to be proportionately greater.

**Members of the Public**

Members of public raised a number of qualitative concerns about retail need including:

- With respect to non-food retailing there are already signs that there are too many shops.
- New cafes and restaurants should include public toilets
- Need for vibrant independent shops and restaurants in Beccles.
- Too many charity shops in Beccles at present.
- Need for an independent health club in Beccles
- Need for a niche supermarket in Beccles.
- A multiplex will make existing cinemas struggle.

**How these comments have been taken into account in the First Draft Local Plan**

The projections from the Retail and Leisure Needs Assessment have been used to inform the targets in the First Draft Local Plan. No evidence has been presented to suggest these figures are not robust. It is considered that the population growth models used in that assessment are broadly consistent with population projections from the Strategic Housing Market Assessment.

**Where should the growth go?**

Q07 Which option for the distribution of new development presented on the following pages do you think is the best? (146 respondents) Q08 Are there any other approaches to distributing development across the District that we should consider? (45 respondents) Q09 If we were to consider planning for a new settlement in the new Local Plan where should that settlement be located? Options could include somewhere between Lowestoft and Great Yarmouth, between Lowestoft and Beccles or somewhere else close to existing railway lines and A roads. (53 respondents)

**Statutory Consultees**

The Greater Norwich Local Plan Team stated they have no preferred view on the growth options but noted that growth in Beccles and Bungay will help in meeting some of the service needs to current and future residents of South Norfolk residents in the Waveney valley. They advise that a new settlement should be considered for potential for beyond the plan period given the long lead in times and high infrastructure costs.
Suffolk County Council stated they intend to continue to work with the District Council to understand the traffic implications of different scenarios. They raised concern that dispersed patterns of growth do not tend to encourage sustainable travel and put greater emphasis on subsidised public transport services. They also raised concern that a new settlement of 2,000 homes is unlikely to generate viable demand for public transport services or adequate transport infrastructure including, amongst others, new rail connections. They inform under all of the options the planned third crossing would offer very good value for money. They stated that growth in Southwold and Reydon should be limited to meeting immediate local needs as there are no rail connections and road access is poor. Growth options for Beccles, Bungay and Halesworth should be acceptable from a transport perspective.

The Environment Agency stated that any new settlements should positively improve the environment. They state there should be a robust application of the National Planning Policy Framework’s Sequential and Exception Tests at the Local Plan level when considering site allocations for new strategic housing developments in the District.

Parish and Town Councils

Beccles Town Council stated that Beccles and Worlingham should not be expected to take more than 10% of future housing needs due to the severe constraints on infrastructure. They stated that Beccles is constrained from any expansion by the River Waveney on one side and the common/marshes on the other and has almost no available land within it. They felt that the other market towns and rural areas should take a bigger share of new development and an attempt made to re-balance the District with more development to the south away from Lowestoft and Beccles. They stated the benefits of the railway and A12 links to Saxmundham to the south and the need to look beyond the Waveney District border when planning over the next 20 years.

Carlton Colville Town Council supported development of brownfield sites and development in Halesworth due to road and rail access. They strongly objected to more development in Carlton Colville as they argue it has already had significant levels of development and suffers from flood risk due to drainage systems unable to cope with increased housing. Carlton Colville Town Council stated that an alternative option would mean fewer houses in Carlton Colville which has become a commuter town.

Corton Parish Council commented that massively increasing the size of villages can only be a bad thing. They argue that many new homes get sold on to second home owners or landlords resulting in an increased need for more housing. They stated that derelict and disused buildings should be used for housing before building new. They stated that infrastructure needs to be considered and thought of in the long term.

Halesworth Town Council favoured Option 3 as it spreads development evenly across the market towns. They state that option 4 is not acceptable as it would be detrimental to the market towns. They go on to
state that in order for Halesworth to not become a retirement town considerable investment is needed to attract industry and a younger demographic.

Ilketshall St. Lawrence Parish Council supported Option 3.

Ilketshall St. Margaret Parish Meeting supported Option 2. Ilketshall St Margaret Parish Meeting stated that development should be spread across the market towns but not the rural areas. Ilketshall St Margaret Parish Meeting stated that a new settlement could be located between Lowestoft and Beccles.

Kessingland Parish Council acknowledged that the village is expected to accommodate some growth to meet its needs and to prosper. They note that this must be balanced against the need to preserve its role as a rural settlement which does not encroach unduly on the open countryside that surrounds it.

North Cove Parish Council stated that development should be located wherever good employment can be created.

Oulton Parish Council supported Option 3 as Lowestoft and specifically Oulton does not have the road infrastructure, medical facilities, or schools to take 75% of growth over the next 20 years. They add that the development at Woods Meadow will only add to these problems. They state that Southwold needs more homes for local people as too many existing homes are second homes or holiday homes. Oulton Parish Council suggested that any new settlement should be easily accessible from the main trunk roads A12 or A146.

Reydon Parish Council favoured the majority of development to be located in Lowestoft and Beccles where it would be aligned with growth in the offshore renewables sector and would deliver regeneration. The Parish Council suggested that for Southwold and Reydon the housing targets should be at the lower end of the ranges suggested. They stated that they would oppose widespread new growth in the locality due to the Area of Outstanding Natural Beauty, the fact that new homes could become second homes, the lack of infrastructure and problems with the sewerage network and traffic issues.

St James South Elmham Parish Meeting believed that Option 2 is the most appropriate. They state that the option allows the focus to be retained on Lowestoft but allowing a proportionate amount of development in the market towns. They stated that Option 3 would require extensive improvements to the District’s infrastructure and unnecessarily provide for a significant increase in rural housing. They stated that Option 4 would unlikely succeed without major investment in infrastructure. St James South Elmham Parish Meeting stated that they believe a major new settlement is inappropriate and unlikely to succeed given the lack of infrastructure anywhere in the district.

Southwold Town Council stated that Option 3 is not viable due to inadequate infrastructure, lack of land in Southwold, and lack of suitable land in Reydon. They state that the Area of Outstanding Natural Beauty needs to be taken into account. Southwold Town Council stated that they were not in a position to comment on alternative scenarios other than urging that new homes should be built in close proximity to
where jobs are located in order to cut down on car use and enhance a sense of connection to local communities. Southwold Town Council stated that developing a new “garden” town could be an exciting option and should be placed close to a rail line with direct access to Norwich to reduce the need to travel by car.

Worlingham Neighbourhood Planning Team stated that they wish for Worlingham to be considered separately to Beccles as an independent village. They stated that the majority of the development should be where the facilities and infrastructure currently are, i.e. Lowestoft. However, they feel that the other market towns of Bungay and Halesworth should take a more proportionate share of the development as they have similar or better amenities than Beccles. They provide the example of the Campus Project in Halesworth and that Halesworth has rail connections with Ipswich and onward to London and other places.

**Other Organisations**

The Beccles Society supported Option 3 out of the four options presented as it shares the benefits across the market towns. However, they were concerned that this option provided for too much growth in Beccles. They presented a useful overview of the strengths and weaknesses of the main towns. The Society outlined the positives of Beccles in terms of location and availability of employment. They raised concern about options 1, 2 and 4 was that they limited scope for development in other areas and created an imbalance. They added that a further difficulty with Option 4 was the difficulty in finding a suitable location for a new settlement. The Beccles Society presented a further option as a variant of Option 3 as follows:

- Lowestoft 60%
- Beccles 12%
- Halesworth 8%
- Southwold 6%
- Bungay 4%
- Rural Areas 10%

They consider it has the benefits of Option 3 with slightly less development allocated to Beccles.

The Halesworth & Blyth Valley Partnership supported Option 3 to distribute development more evenly across the market towns. They reject options 1, 2 and 4 as they would undermine the existing market towns and be counterproductive to the balance of the Waveney economy. The Halesworth & Blyth Valley Partnership stated that any new settlement would be to the detriment of the Market Towns and rural areas and dilute their importance in community life.

The Lowestoft and Waveney Chamber of Commerce favoured Option 2 which, whilst focusing most growth on Lowestoft, also allows for significant growth in Beccles and Worlingham although they would not want to see new housing in those towns developed simply to service employment outside the District.

The Lowestoft & Yarmouth Regional Astronomers group state that Option 3 is preferable to reduce urban sprawl in North Lowestoft.
The Southwold & District Chamber of Trade & Commerce support more development being directed to Lowestoft and Beccles. They favour 3% of development being directed at Southwold and Reydon. They state that building significant number of homes in Southwold and Reydon will not tackle the housing shortage as many of them will be purchased as second homes. The society favours 3% of development being directed at Southwold and Reydon.

The Southwold and Reydon Society strongly support the options directing development to Lowestoft and Beccles. They state that development in Lowestoft which is the key driver of the local economy will continue to support regeneration of the town. They state they would oppose widespread new growth in the locality due to the Area of Outstanding Natural Beauty, the fact that new homes could become second homes, the lack of infrastructure and problems with the sewerage network and traffic issues.

Suffolk Wildlife Trust state that the consideration of options should take into account ecologically sensitive areas.

**Developers/Landowners**

Benacre Estates Company supported Option 3 stating that it is essential that the Council recognises that development in smaller settlements is necessary and sometimes more appropriate. They stated that options 1, 2 and 4 are contrary to the National Planning Policy Framework as they fail to promote sustainable development in the rural area. They stated that villages play an integral part in the servicing the local community and it is vital provision is made for their growth to ensure their continued contribution to their local communities. They considered the village of Wrentham is suitable for providing and supporting new housing development.

Badger Building concluded that they believed Option 3 provided the best distribution of development across the District. They stated they believed that the previous strategy of concentrating on regeneration of Lake Lothing had failed. They stated that any strategy for the allocation of new housing needed to provide a range of smaller sites reducing the likely infrastructure costs for each site to a level manageable by a single developer and provides a range of locational options for purchasers. They stated that this in turn should increase development rates. They support allocations in the market towns. Badger Building stated that the upfront infrastructure costs, the likely take-up and build rates mean that a new settlement would be a non-starter.

Lawson Planning Partnership on behalf Frostdrive and Norfolk & Suffolk NHS Foundation Trust supported the support by each option for focusing most development in Lowestoft. Lawson Planning Partnership on behalf of Frostdrive Ltd and Norfolk and Suffolk NHS Foundation Trust stated that the key consideration when identifying the approach to distributing development across the District is to ensure that development is focussed in sustainable locations, that are well connected to existing services and facilities.
Gladman Developments supported the consideration of a new settlement although they stated that caution should be applied in establishing expected build rates and infrastructure requirements. They also advise that the Council should maximise the number of sites allocated to ensure delivery. They advised that a variety of sites in a range of locations will ensure a flexible and responsive supply of housing land.

Larkfleet Homes supported Option 2. They referenced the initial sustainability appraisal and suggested it is most likely to deliver the objectively assessed need for housing in full. They suggested Option 1 is the least likely to deliver the objectively assessed need for housing in full. They also referenced the sustainability appraisal and argue that option 2 will have preferable environmental impacts over other options. They stated that the landscape around Beccles is less sensitive to development and that the option is sequentially preferable in flood risk terms given the high number of properties at risk from flooding in Lowestoft. They argued that option 2 could also have economic benefits given employment potential at the Ellough Enterprise Zone. Larkfleet Homes state that option 2 will support the vitality and viability of Beccles town centre. Larkfleet Homes commented that the strategy should focus more growth in Beccles to support the vitality and viability of the market town. They stated that more significant growth at Beccles would also support and complement the development of the Enterprise Zone and Ellough Industrial Estate. They argue that the percentage of growth for Beccles could be expressed as a range from 25-35% with a corresponding reduction in Lowestoft. Larkfleet Homes stated that a new settlement does not seem a viable or realistic proposition in this instance. They stated that it is apparent from the published ‘Call for Sites’ responses that no suitable site has been put forward for such a development and that if there are no deliverable new settlements then Option 4 should not be further progressed. They argue that continuing to assess the option would be contrary to the SEA regulations and various guidance documents as it would not be realistic alternative.

M J Edwards & Partners supported option 3 so that development isn’t solely concentrated in larger settlements balancing deliverability and sustainability. They stated that more growth in rural areas should result in an increase in the provision of services and facilities. They stated the option would allow settlements like Corton to receive a proportion of development commensurate with their size.

Savills on behalf of a consortium of landowners south of Lowestoft supported Option 1 so that growth takes place close to a large urban area with existing and potential job opportunities. They also believed that Option 4 could be suitable providing any new settlement is located close to an existing settlement in order to not impact upon the rural landscape.

The Somerleyton Estate and the Sotterley Estate stated that Option 3 best responds to the guidance in the National Planning Practice Guidance.

St John’s Hall Farms stated that none of the options allow Bungay to properly thrive and prosper. St Johns Hall Farms stated that 8% of growth (750 new homes) should be allocated to Bungay in order for it to be a self-sustaining community.
Wellington Construction supported a combination of Options 1, 3 and 4 taking into account potential growth in Halesworth and the provision of a new settlement.

**Members of the Public**

Members of the public generally accepted the need for new development. The main concerns, common through most of the responses, were infrastructure, transport, employment and impact on the local environment. Members of the public were divided in their preference for the different options presented. A majority preferred Option 3. Approximately a third of responses supported Option 4. There was less support for Option 1 and Option 2 had the least support with less than 10% of respondents supporting it. The issues raised with respect to each option are summarised below:

**Option 1** – In support of this option, members of the public noted the job opportunities available in Lowestoft to support growth and the fact that Lowestoft is close to the planned offshore wind developments. It was highlighted that Lowestoft needs better jobs and professional people to help off set and transform existing deprivation. It was stated that development in Lowestoft will benefit the rest of the District and there was plenty of available land to build on and infrastructure to support more people. It was also noted that there was more potential to use brownfield land from this option. It was raised that Lowestoft was better able to absorb new development and the town already has the infrastructure to support new development. Those who objected to this option mentioned that there had been too much growth in Lowestoft in recent years resulting in frequent traffic congestion. It was also noted that Lowestoft is seen as a downmarket area.

**Option 2** – In support of this option, members of the public noted that Beccles seemed to be thriving and that infrastructure is already in place to accommodate growth. Those who objected to this option mentioned that there was a risk that development could damage the unique character of the market towns. Concern was raised that infrastructure such as schools, doctors and dentists in Beccles and Worlingham would not be able to cope with this level of development. Concern was also raised about traffic impacts on the towns roads, which some of them medieval are in character.

**Option 3** – In support of this option, members of the public stated that it would help support market towns to thrive. It was stated that the option would stop the exodus of younger people from market towns and stop them from becoming dormitory towns or areas of deprivation. It was stated that this option will better support an ageing population by giving more choice for older people to live close to their families. It was suggested that the option would encourage better transport links in rural areas and support shops and pubs and small schools. Those who objected to this option raised concern that too much housing in small towns will change the character and spoil their appeal. Concern was raised about there being too much traffic congestion. It was suggested that new development in rural areas would not support local services as people who live in them will continue to shop and work in towns. Concern was raised that the option would mean too much growth for Bungay which, without a bypass, will create traffic congestion. Concern was also raised that market towns do not have the infrastructure to absorb new residents.
Option 4 – in support of this option, members of the public stated that a new settlement could be built with the infrastructure to support it and avoids overloading existing infrastructure. It was stated that there would be less traffic congestion. It was also noted that with an ageing population a new settlement between Lowestoft and Great Yarmouth would enable better access to health facilities at the James Paget Hospital. Those objected to this option raised concern about the amount of infrastructure that would need to be provided, the impact on existing towns and the fact that a new settlement could spoil the rural character of the area.

Suggestions for alternative options from members of the public included the following:

- 95% in Lowestoft.
- Option 3 but with 60% in Lowestoft and 10% in Beccles.
- More development in Bungay as the place is moving towards becoming a ghost town.
- Significantly more social housing in Southwold to deter second homes.
- Increased development in Halesworth due to its railway station.
- Growth based on capacity of infrastructure to cope with development.
- Every village should be allowed some development say 1 property per year to allow the next generation to remain.
- All four options allocate too much development to Beccles which will not be appropriate without better links to Lowestoft and Norwich. Less than 10% growth allocated to Beccles.
- Regeneration of existing housing and infrastructure.
- Allow the market to decide with some areas protected from development.
- No largescale housing in Southwold and Reydon due to lack of employment opportunities and the Area of Outstanding Natural Beauty.
- Focus development on brownfield land rather than greenfield land.

Suggestions for the location of a new settlement by members of the public included:

- Halesworth
- In the Mutford area between Barnby and Gisleham with a new link road to bypass the Barnby Bends.
- Brampton
- Lound
- Blundeston
- Between Lowestoft and Great Yarmouth
- Between Carlton Colville/Lowestoft and Beccles. Although other comments raised concern about this option as it could lead to Beccles losing its identity by becoming joined to Carlton Colville.
- South side of Lowestoft
- Around Beccles
- Between Halesworth and Beccles on the train line
- North of Wrentham
How these comments have been taken into account in the First Draft Local Plan

Considering the above comments, together with the findings of the Sustainability Appraisal the Council considers that the most appropriate distribution of growth is a variation of Option 3 which would see slightly more growth allocated to Bungay and slightly less to Southwold and Reydon. The Council considers that this option presents the greatest likelihood of objectively assessed needs being met in the most sustainable way. Out of all the options, Option 3 seemed to be favoured by most respondents.

Policy WLP1.1 of the First Draft Plan therefore presents a distribution strategy which resembles Option 3 of the consultation. The only difference is that 6% of growth is allocated to Bungay rather than Southwold and Reydon.

It is considered that Beccles and Worlingham as the second largest built up area within Waveney should accommodate more than 10% of growth. The town is a sustainable location for further growth and accommodating 15% of the District’s growth will allow the area to expand at similar rate to that of the last 20 years and enable the delivery of new and improved infrastructure. It is also considered that 25% of growth to Beccles and Worlingham as suggested by some consultees would be too high. This level of growth would still be challenging for the market to accommodate and there would be a greater risk the objectively assessed needs for housing may not be met under this option. Furthermore, it would reduce the potential for growth in other towns and the rural areas which could also benefit from appropriate levels of growth to support local services and facilities.

It is not considered that Option 1 of putting higher levels of development to Lowestoft would be appropriate as it is questionable whether the local housing market could support such high levels of growth in the town. The effect of the option would result in most greenfield sites to the north and south of the town being developed. Some of these would likely either be in a sensitive landscape or on high grade agricultural land. As greenfield land is normally a more attractive option for developers, there could be less interest from developers in the brownfield regeneration sites currently permitted in the central areas of Lowestoft. Focussing growth in Lowestoft at the expense of other towns would do less to support town centres in the market towns and significant levels of development in Lowestoft would result in further elongation of the town with most new development taking place some distance from the town centre.

Whilst the First Draft Plan does promote a new Garden Village to the North of Lowestoft it is considered that due to its proximity to Lowestoft this is more part of accommodating growth in Lowestoft. Furthermore, it is considered unlikely that a new settlement could accommodate 2,000 new homes within the plan period as suggested by Option 4.
Q10 Which option for the distribution of new retail development presented do you think is the best? (57 respondents) Q11 Are there any other approaches to distributing development across the district that we should consider? (16 respondents)

**Statutory Consultees**

Greater Norwich Local Plan Team stated that growth option 2 would be preferable because it would aid the sustainability of small settlements. However the appropriateness of this option will be decided by the market.

**Parish and Town Councils**

Carlton Colville Parish Council stated that option 2 would be the best distribution for retail and leisure development. Emphasis should be placed on developing brownfield sites in waterfront locations (such as the Boulton and Paul site) and older parts of Lowestoft, such as the Town Hall area.

Southwold Town Council stated that Southwold does not require another food store and has sufficient space for other retail uses: the King’s Head public house has permission to be converted into three retail units and the Fat Face store will be converted into three retail units. Southwold Town Council stated that it was essential to locate new retail development in town centres and leisure centres as close to town centres as possible. This was needed to increase town centre vitality and discourage car use.

Ilketshall St. Margaret Parish Council favoured option 2 for retail and leisure distribution. Ilketshall St. Margaret Parish Meeting did not think there was another approach to distributing development.

St. James South Elmham Parish Meeting stated that with the shift towards internet retailing it was questionable whether additional space was needed for retail floor space. The future success of retail will depend on quality and service and investment should be focused on existing town centres. Leisure development (except in the two coastal resorts) should be sensitively controlled and enable people to enjoy the natural environment.

North Cove Parish Council stated that development and regeneration should be focused on town centres.

Oulton Parish Council preferred option 2 on the grounds that development should be located where it serves a proven need in a residential area. Development should be easily accessible from major roads. Adequate parking facilities must be provided to prevent the problems experienced at the Water Lane leisure centre in Lowestoft, which suffers from grossly inadequate car parking.
Other Organisations

Halesworth and Blyth Valley Partnership supported modest development in all town centres. Halesworth needs a new food store and leisure facilities. The town is a hub for surrounding villages and should be the focus of retail and leisure development. This is a pattern to be repeated across the rural areas.

The Beccles Society stated that retail development should be located within large housing developments. This is to discourage residents from visiting town centres and neighbouring areas for their daily shopping, leisure and health needs.

Developers/Landowners

Badger Building stated that if option 3 is selected for housing distribution then option 2 should be selected for the distribution of retail and leisure development. Badger Building stated that there are no other approaches to distributing development across the District that should be considered.

Larkfleet Homes stated that option 1 would not be sustainable or help to meet the needs of the wider area. It would not deliver the development needed to support the vitality of market towns. Services in Lowestoft are not easily accessible and would encourage unsustainable modes of transport. Option 2 is more sustainable and would enable market towns to serve their surrounding areas. A hierarchical approach is required to ensure that there is an emphasis on key service centres and that development is of an appropriate scale.

St. John’s Hall Farms favoured option 2 as a pattern for future development. Development should be focused in town centres except for certain larger food stores, where a sequential test may be necessary. Larger food stores that cannot be located inside town centres may need to be located in out of town areas.

Members of the Public

Members of the public favoured retail and leisure development in Lowestoft but also that some development takes place in the market towns. Retail and leisure development would help to regenerate town centres. However there was also concern that town centres were hamstrung by lack of parking and, in the case of Lowestoft, were inconvenient to drive to. These two problems made town centres vulnerable to competition from out of town shopping. Internet retail was seen as further increasing pressure on town centres and there was concern that increasing the amount of retail in town centres might be misguided at a time when traditional retailing of this sort appeared to be contracting.

Members of the public favoured some further development in the market towns. Bungay and Halesworth were identified as towns that were falling behind competing centres and needed investment to improve their competitive position. Town centre development should be accompanied by improved transport infrastructure. The mix of shops should include a range of retailers which serve practical needs, for example, iron mongers and fresh food retailers. Leisure development should be more broadly defined so
that it includes more than just pubs and bars. High density town centre development was thought necessary to prevent urban sprawl and protect the countryside.

**How these comments have been taken into account in the First Draft Local Plan**

Considering the comments above and the Sustainability Appraisal, the First Draft Local Plan seeks to distribute retail and leisure growth in a similar manner to Option 2 from the consultation.

**Q12 Are there any town centre or edge of centre sites available that would be suitable for retail and leisure development?**

18 respondents

**Statutory Consultees**

No comments were made in response to this question.

**Parish and Town Councils**

Carlton Colville Parish Council stated that development should be located in vacant town centre retail plots.

Halesworth Town Council stated that the town served as a hub for the surrounding area and that retail facilities are heavily used. There is potential for another supermarket on the town centre site. This site has been available for a number of years. Halesworth Town Council understands that there has been interest in purchasing the site but there are no details available. Development of the town centre site would increase footfall and would serve a large rural hinterland. Similar development in other town centres can only increase their vibrancy.

Ilketshall St. Margaret stated that they were not aware of any suitable sites for retail development.

Southwold Town Council stated that the town’s single most important leisure facility was the library. Residents expressed strong support for relocating this facility to the former Southwold Hospital site. There was also strong support for using the former hospital as an innovation centre to encourage new businesses. The Chamber of Trade strongly supported using the former hospital as a community hub and business centre to increase year round footfall in the town centre. Many shops are barely viable because of the loss of year round footfall. Visitor numbers have risen to a point where the attractiveness of the town is threatened: Southwold’s ability to provide litter bins, clear away litter, clean toilets and repair infrastructure has become strained. There are significant issues with traffic congestion and parking – during the tourist season the pavements are so crowded that people have to walk in the High Street, which is the town’s one major traffic artery.
Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building drew attention to significant areas of vacant land on Peto Road and Commercial Road, which could be used for commercial development. There was also a lot of unused railway land. Subject to flood risk issues being resolved these sites should be developed for commercial use as they form a gateway into the town centre and in the case of Peto Road is part of the link to the retail park.

Larkfleet Homes identified its own proposed development to the south of Beccles as a potential location for further retail development. Retail development would help to address the weakness in convenience retail identified in the Retail and Leisure Needs Assessment and would provide retail development to the south of the town. The forthcoming Beccles relief road would increase access to retail development in this area.

Members of the Public

Members of the public suggested various potential sites for future development:

- Site 16 in Beccles for indoor sports provision.
- The Loaves and Fishes site at Beccles Marina.
- Land to the south of Beccles.
- Shops along London Road South.
- Lake Lothing Waterfront – this should be linked to Lowestoft South Beach and The Broads.
- Vacant town centre retail plots.

More generally there was concern to protect town centres and to ensure that people living outside of Lowestoft had access to an adequate range of services.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Plan identifies a site at Peto Square (Policy WLP2.3) and the Battery Green Car Park (Policy WLP2.7) for town centre use development. No other sites were found to be suitable or available for this type of development. The First Draft Local Plan also includes provision for retail development on large residential sites allocate in Lowestoft and south of Beccles (Policies WLP2.4, 2.12, 2.15 and 3.1)

Q13a) Should we prioritise development in villages which have: i) the best provision of services and facilities (or accessibility to services and facilities); ii) the greatest housing need; iii) community ambitions for more growth; iv) the best opportunities for development?

26 respondents
Statutory Consultees

The Greater Norwich Local Plan team suggested option (i) would be the most appropriate to support access to services and facilities. Additionally, it was suggested that limited development should take place in smaller villages and hamlets where access to services and facilities is difficult.

Parish and Town Councils

Beccles Town Council supported option (i) suggesting there was a need for villages to be able to access services and facilities in nearby villages and larger service centres.

Ilketshall St Margaret Parish Meeting suggested option (i) saying people should have access to a mix of services and facilities.

Carlton Colville Town Council suggested option (iii) saying development should be distributed where it is wanted.

North Cove Parish Council suggested option (iv) stating that development should have access to employment.

Southwold Town Council suggested option (iv) saying new development should be concentrated around market towns with infilling permitted in villages to protect their character and the setting of these settlements. An exception to infill sites should be made for affordable housing. New development should be well linked to the town centre by walking and cycling routes. Development should be supported with the necessary infrastructure. Examples of poorly designed development that should be avoided include Carlton Hall in Carlton Colville and the development in Saxmundham adjacent the A12.

Other Organisations

The Southwold and Reydon Society suggested option (ii) saying development is best located where it is needed and option (iii) where there are ambitions for growth.

Developers/Landowners

AR Hall & Sons suggested a mix of all elements set out was required adding that to support option (iv) villages in the context of their wider networks needs to be considered in accordance with the National Planning Policy Framework.

Badger Building suggested option (iv) saying development should be of a scale that reflects the size of the settlement to protect its character and setting. Identifying a settlement hierarchy which set out how much development could be acceptable in these settlements could support this approach. The sustainability of small villages is further undermined without new housing.
Benacre Estates Company suggested all four options should be considered as this is a more sustainable option in line with the NPPF. The need for a settlement to contain services and facilities is inflexible and it is more appropriate to consider how development in one settlement can support, or be supported by existing facilities in another nearby.

Gladman Developments Limited suggested option (ii) saying that housing should be delivered in the rural areas where it is needed.

MJ Edwards & Partners suggested option (ii) saying housing should be delivered where it is needed and option (iv) where opportunities arise.

The Somerleyton Estate and the Sotterley Estate suggested option (i) stating development is most appropriately located where there are a mix of services and facilities available and that development should seek to protect the character and setting of a settlement. It was also suggested that approaches should be mindful of blanket policies that could permit or not permit development that is appropriate for particular locations.

Members of the Public

Fourteen members of the public responded. It was suggested that development should take place where there were existing facilities available and additional development could help support these facilities (option i). It was also cited that new development should be supported by improvements to the existing infrastructure.

Members of the public highlighted the need to protect the character of rural villages suggesting this could be done by allowing infill development rather than allocating greenfield land for new development suggesting support for option (iv). Such development could help revitalise small communities. Concerns were raised that development in rural areas with no facilities would be detrimental to the area.

There was a suggestion that development was needed across the rural areas of the District to support these communities suggesting option (iv) was appropriate. This would help reduce the impact of new development on the market towns. However, it was emphasised these opportunities should respect the character of the existing settlement.

It was noted that development should be considered in the context of community networks and understand how these networks function. Without access to services and facilities in the area these small communities will fade away. It was suggested that development in villages nearest large service centres where a variety of services and facilities were available would be appropriate.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP7.1 categorises villages and the level of development based on scale and service provision. It was not possible to categorise villages based on their level of housing need and aspirations for growth as there was insufficient local evidence on this.
Q13b) If we prioritise development based on services and facilities provision, what services and facilities do you think are the most important for a community to have so it could accommodate further development?

13 respondents

Statutory Consultees

Parish and Town Councils

Beccles Town Council stated that access to public transport, a shop and community facilities for young people were important.

Southwold Town Council suggested that infrastructure and development should take place which is in keeping with the character of the settlement and the landscape.

Other Organisations

The Southwold and Reydon Society suggested that access to a shop and public transport to access of services and facilities was important.

Developers/Landowners

Badger Building suggested that new development should have access to a shop and education facilities.

The Somerleyton Estate and the Sotterley Estate suggested new development should be located where there is access to a mix of facilities.

Members of the Public

Fourteen members of the public responded and a majority of respondents suggested a variety of services and facilities that people living in rural areas should have access to. The most frequently cited provision is as follows (in order of most to least):

- education;
- health facilities (doctor, dentist);
- community facilities (leisure, village hall, public house);
- good infrastructure (road network, drainage);
- public transport;
- shop;
- broadband;
How these comments have been taken into account in the First Draft Local Plan
The services suggested above were used to help define Larger and smaller villages in Policy WLP7.1 of the First Draft Local Plan.

Q14 Should we limit development in rural areas to a small number of villages or ensure all villages and hamlets receive some development?
22 respondents

Statutory Consultees
The Environment Agency would welcome early discussion on a new settlement is moved forward. There should be a robust application of the Sequential and Exception Tests set out in the NPPF when housing allocations are considered. Any new settlement should improve the environment in a positive manner.

Greater Norwich Local Plan team suggested new development should be focussed on villages with services and facilities but some development in smaller villages and hamlets could increase delivery through choice and competition.

Parish and Town Councils
Carlton Colville Town Council suggested all villages should have some development.

Ilketshall St Margaret Parish Meeting said that new development should be focused on the larger villages will minimal development in smaller settlements.

Other Organisations
No comments were submitted in response to this question.

Developers/Landowners
MJ Edwards & Partners suggested development in rural areas should be limited to a small number of villages (larger villages) except where small developments would meet local need.

The Somerleyton and the Sotterley Estate suggested that a settlement hierarchy could be devised to deliver housing in the better serviced villages with limited development in smaller settlements.

Wellington Construction Limited stated that without some development in smaller villages they could decline therefore flexibility was required.
Members of the Public

Fourteen people responded with and there was a general consensus that new development should take into account access to services and facilities whether these are located within the settlement or there was public transport.

It was suggested that housing in all rural villages would help people to stay in the settlements they are connected to. These should include dwellings that are affordable with a proportion of social housing for rent. A flexible approach is required to deliver housing in rural settlements as they arise and where there is a need for housing. Such housing should be in proportion to the scale of the settlement.

There were comments that development in locations where there are no services or facilities should be considered unsustainable therefore the focus should be the larger villages where these exist. It was stated there was a need to protect services as they have been protected in the past.

There was a suggestion that development should be focussed on Lowestoft where there is the greatest access to services and facilities.

The need to protect the landscape and wildlife was highlighted.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP7.1 of the First Draft Local Plan allows for development within all rural villages but promotes more development in larger villages with better service provision.

Q15 What villages do you think are suitable for new housing and economic development over the next 20 years and what should be the scale of growth?
75 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ashby, Herringfleet & Somerleyton Parish Council stated they are preparing a Neighbourhood Plan.

Barnby Parish Council was in agreement with the housing distribution strategy set out in the Core Strategy. Concern was raised that sites proposed in the village document would treble the size of the settlement, are located outside of the physical limits and have access problems.
Blundeston & Flixton (East) Parish Council stated the development of the Blundeston Prison site would be
enough to meet the needs of the community therefore further development in the village is not necessary.

Carlton Colville Town Council suggested all villages should receive some development but not at the expense of their character.

Ilketshall St Margaret Parish Meeting suggested development was more appropriate in larger villages and should be limited in smaller settlements.

Kessingland Parish Council has allocated sites for housing development in their Neighbourhood Plan therefore no further sites should be required.

Oulton Parish Council suggested Southwold & Reydon.

St James South Elmham Parish Meeting suggested that all rural settlements required a limited amount of development that is proportionate to their size and character.

Other Organisations
No comments were made in response to this question.

Developers/Landowners
AR Hall & Sons suggested development was appropriate in Reydon as it has a variety of services and facilities, has access to public transport and has good links to Lowestoft and the A12.

Benacre Estates Company suggested Wrentham was suitable for housing development with a limited number of facilities, public transport and is located on the A12.

MJ Edwards & Partners suggested Corton was an appropriate location for housing development as it is a larger village with services and facilities. There is also access to employment and the wider area of Lowestoft.

Somerleyton Estate suggested the villages of Blundeston, Lound and Somerleyton were appropriate for development. Somerleyton has a greater number of services and facilities than many other larger villages in the District and these make it a sustainable location. Such development could help deliver a new village hall. Blundeston has a number of community facilities available and the sites submitted will have good access to these. There are limited facilities in Lound by the community has access to facilities in nearby settlements. Development in these areas could help maintain the balance of the communities in terms of population structure. All of the submitted sites are available, achievable and deliverable. Community engagement has taken place.
Sotterley Estate suggested that villages with a good range of services and facilities were suitable for development that is proportionate to their size and could help support the wider network of settlements. Such a network is Willingham St Mary and Shadingfield with other villages of Sotterley, Ellough and Weston. A mix of tenure and housing types could be delivered. Willingham St Mary and Shadingfield have a pub, a meeting place, a playing field and access to public transport therefore limited community facilities are available.

Members of the Public

Fifty five members of the public commented and it was recognised that new development in rural locations could help support local facilities such as schools, pubs, village halls and churches but this development should reflect the character of the settlement. It would help if these communities had access to public transport. New development would also help enable young people to purchase homes in rural communities. A limited amount of development where needed and wanted could help revitalise communities.

Concern was raised that new development will not be affordable and will be used as second homes.

Infill development should be enough to meet the needs of small rural communities.

Several respondents stated that development in rural areas should not take place until the lack of infrastructure was addressed.

Areas subject to flood risk and coastal erosion should be avoided.

Specific areas suggested for development include:
- Blundeston (towards Lowestoft) and the area north of Parkhill (Lowestoft);
- Bungay as it has seen little development and has services and facilities;
- Brampton has had no development for a long time, it has an aging population and has lost services and facilities. It has access to the train station and the A145 and development could revitalise the community.

Networks of communities should be considered where facilities in one village could help serve the needs of another.

It was highlighted that Lound with Ashby, Herringfleet & Somerleyton were preparing a Neighbourhood Plan with input from the community to inform an approach to development in the future.

There was significant objection to the housing sites identified in Blundeston citing a lack of infrastructure, services, drainage issues and potential impact on the character of the village. It was suggested that the redevelopment of the Blundeston Prison site should be suffice during the next plan.

Concerns were raised about development in the Beccles area.
How these comments have been taken into account in the First Draft Local Plan

These comments have been taken into account when considering sites in each village. There was not enough consensus for these comments to inform the overall rural settlement strategy outline in Policy WLP7.1

Settlement Boundaries

Q16 Should we retain physical limits for Lowestoft, the market towns and larger villages and continue to focus development within them and on sites allocated for development? (38 respondents) Q17 Should physical limits be tightly defined around existing built development or more loosely to allow for more small scale development around settlement edges? (31 respondents) Q18 If we remove physical limits, what criteria should be put in place to address the issues discussed above? (12 respondents)

Statutory Consultees

Greater Norwich Local Plan Team recommended that development boundaries should be retained, but they suggested that they should be drawn with some limited potential for small-scale development. The Greater Norwich Local Plan Team stated that limits should be drawn allowing for limited potential for small-scale developments.

Parish and Town Councils

Ashby, Herringfleet and Somerleyton Parish Council stated that they wish to continue without settlement boundaries in the form of physical limits in order that the villages of Ashby Herringfleet & Somerleyton continue to be regarded as open countryside when looking at housing and other development. They noted that when the current LDF was created it was identified that the developed area of Somerleyton is attractive because of the widespread nature of the development with large spaces between.

Carlton Colville Town Council stated that the physical limits should be retained and development should take place on brownfield sites within boundaries. Carlton Colville Town Council stated that the limits should be defined tightly.

Ilketshall St Margaret Parish Meeting and North Cove Parish Council stated that physical limits should be retained. Ilketshall St Margaret Parish Meeting commented that the limits should remain as they are.
Ilketshall St Margaret Parish Meeting stated that the countryside and natural resources should not be adversely affected.

Kessingland Parish Council stated that it is particularly important that development is directed to appropriate locations and that sprawl is avoided and the physical limits policy provides that direction. They noted that Kessingland does have clear restraints as to where growth can take place. To the east are the North Sea and a site of Special Scientific Interest, to the south there is the Area of Outstanding Natural Beauty. Kessingland Parish Council stated that following engagement as part of their Neighbourhood Plan that they came up with the following policy in their Plan: “Development in Kessingland parish shall be focused within the physical limits boundary of Kessingland village as identified on the proposal map. Development proposals will be supported within the physical limits boundary subject to compliance with other policies in the development plan. Development proposals outside the physical limits will not be permitted unless

- They represent proposals to deliver the site allocations (policies SA1, SA2, SA3, CI3 and C14)
- It is infill development or another exception such as affordable housing, barn conversion, or agricultural workers dwelling required to support the rural economy
- Any review of the Waveney Core Strategy requires additional housing or the identified housing site allocations do not proceed; or
- They relate to necessary utilities infrastructure and where no reasonable alternative location is available”

Oulton Parish Council stated that physical limits should remain as a safety facility to ensure that the already overstretched infrastructure is not made any worse.

Reydon Parish Council stated that with regard to housing, the remaining target for Southwold and Reydon could be met by the development of infill sites and modest expansion of the Reydon village envelope on the lines already allowed for affordable housing under the Rural Exceptions policy (DM22).

Southwold Town Council stated that physical limits should be retained because they serve the very function of preventing sprawl, car dependency, and soulless communities. They stated that brownfield sites should remain prioritised. They raised concern that the business model of high volume house builders is based on delivering maximum profit to shareholders. They noted that there is little incentive to build more houses faster; indeed, they are incentivised to build slowly as this maintains high house prices. Southwold Town Council stated that tightly defined physical limits should be retained with clearly defined exceptions that address car dependency, design, protection of green space, etc.

**Other Organisations**

The Southwold and Reydon Society stated that physical limits should be retained, especially around settlements in the AONB.

The Southwold and Reydon Society stated that physical limits should be tightly defined, with any areas for small-scale development around settlement edges identified within the Local plan.
Developers/Landowners

Badger Building stated that the existing physical limits defined for Lowestoft work well and prevent sprawl but contain ambiguities which should be removed. They gave the example of Corton Long Lane and where housing in Camps Heath adjoins the new Woods Meadow development. The Camps Heath anomaly was also pointed out by another agent for a recent planning application in the area. Badger Building stated that the limits need relaxing in areas where small sites i.e. 10 or less, might create opportunities for SME builders or those wanting to self-build. Badger Building stated that a criteria based approach to physical limits would lead to endless disputed sites around the perimeter of the settlement.

Frostdrive Ltd stated that settlement boundaries can be an effective tool in guiding development to the right locations within the District. However, they stated that the existing boundaries have been drawn tightly and are considered to be too restrictive and in places are limiting to development in sustainable locations. They stated that the boundary at Leisure Way to be out of date. Frostdrive Ltd stated that defining physical limits tightly around existing built development is restrictive and out-of-date and is not encouraging of sustainable housing growth. They stated that physical limits should be defined appropriately for each settlement in the District, allowing the greatest flexibility for development on settlement edges in the most sustainable locations, such as Lowestoft.

Lawson Planning Partnership on behalf of Frostdrive Ltd and Norfolk & Suffolk NHS Foundation Trust stated that removing the physical limits boundaries could set a precedent for development in unsustainable locations and therefore it is considered that the principal of physical limits should be retained.

Gladman Developments raised concern with continuing the approach that defines ‘physical limits’ around the built up areas of Lowestoft, the market towns and the larger villages of the District. They considered that such an approach will act to contain the physical growth of each settlement and will not allow the Council to react to changing market conditions. Gladman Developments stated that the following wording should replace the existing settlement boundary policy: “When considering development proposals, the Local plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

M J Edwards & Partners stated that the physical limits of settlements should be more loosely defined to allow for the small scale development. They stated that edge of settlement sites allow for the logical extension of villages

The Norfolk & Suffolk NHS Foundation Trust stated that physical limits boundaries can be an effective tool in guiding development to the right locations within the District and it is considered appropriate that the notion of physical limits boundaries within the District is retained. They noted that their site at Lothingland Hospital was within the Lowestoft physical limits.
The Somerleyton Estate and the Sotterley Estate stated that the Council needs to reflect current national planning guidance and avoid the use of blanket policies restricting development in some villages and preventing others from expanding unless evidence supports their use. The estates suggested using settlement boundaries and land allocations for Lowestoft and the market towns because the developments likely to come forward in those locations are larger and need to be properly planned to link to infrastructure etc. In the rural areas (formerly the ‘larger villages’ and other) the local planning authority should take a criteria based approach and allow development where it can be shown to be proportionate, sustainable and well related to the existing built form. The Somerleyton Estate commented that if the Council were to apply a settlement boundary to Somerleyton it should be applied tightly. They suggested that loosely defined limits could allow small scale sites to come forward but could undermine larger proportionally sized developments which could contribute to the village’s infrastructure. The Sotterley Estate commented that if the Council were to apply a settlement boundary to Shadingfield/Willingham it should be applied tightly. They suggested that loosely defined limits could allow small scale sites to come forward but could undermine larger proportionally sized developments which could contribute to the village’s infrastructure.

The Somerleyton and Sotterley Estates stated that they believe that Lowestoft and the market towns would benefit from settlement boundaries and site allocations to allow for large scale development to come forward in a planned and integrated fashion. For rural areas they stated that such blanket policy approaches should be avoided. They suggested a policy approach whereby ‘well provisioned villages’ and ‘part provisioned’ villages allow for development subject to the following criterion:

- Landscape, environmental and heritage impacts
- Location context and relationship to settlement
- Responsive to local needs including affordable housing
- The cumulative impact of development in respect of social, physical and environmental impacts.
- Supports local services and facilities and/or creates or expands employment opportunities.

Wellington Construction stated that the physical limits approach is sensible for larger settlements whilst being flexible when promoting new sites.

**Members of the Public**

The majority of members of public who responded to this question thought that physical limits should be retained. It was noted that they help protect the countryside, the area of outstanding natural beauty and natural resources and prevent sprawl. It was noted that the approach provides a clear boundary for all planners/builders/developers to work within and limits the opportunity for uncontrolled and speculative proposals that increase workload and cost on existing scare council resources and minimises adverse impact on developers. One member of the public stated we should not be limiting the boundaries of possible growth for Lowestoft.

Most members of public believed that the physical limits should be tightly defined to avoid coalescence of settlements and protect the environment. Some members of the public stated that exceptions could be
made for affordable housing and other developments which produce community benefits. It was also suggested that larger developments would be preferable to small scale development as they would incorporate new services, facilities, roads and communications causing less disruption to existing communities. One member of the public stated that physical limits should not extend beyond the Beccles Southern Relief Road.

A member of the public stated that clear zones should be required to prevent existing estates form feeling subsumed and that developers should use computer modelling to assess traffic impact. Another member of the public stated that development proposals should be carefully scrutinised to make sure that there is not a more suitable, non green field, site available for development. They noted it would be cheaper for developers to build on fields rather than on derelict sites.

**How these comments have been taken into account in the First Draft Local Plan**

The comments received with respect to settlement boundaries indicates strong support for their retention as an effective tool of managing development and provides useful clarity as to where development is appropriate. Therefore, Policy WLP1.3 of the First Draft Local Plan retains Settlement Boundaries around the towns and larger villages. It also introduces them around smaller villages. Settlement Boundaries have been defined around the built-up area. Due to the nature of built up area and physical features on the ground, in some cases this results in quite a tight drawn boundary with limited scope for development and in other cases does allow for opportunities for small scale development.
Infrastructure and Transport

Q19 Is the Community Infrastructure Levy (CIL) the most appropriate way of securing new and improved infrastructure? Are the existing rates of the levy appropriate?

25 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented that they have not seen any recent positive benefits in infrastructure and highlighted the difficulty in getting a doctor’s appointment and lack of a dentist or post office. New roads do not appear to enhance the area and Carlton Colville has become an area of three distinct parts and no centre. Open spaces appear to have been provided on land which is not fit suitable for construction such as former tips.

Ilketshall St Margaret Parish Meeting stated that CIL seems the best way to support infrastructure for new development but existing settlements need support too.

Kessingland Parish Council highlighted that CIL should be worked up and tested alongside the Local Plan and it should support and incentivise development. It should place control of a meaningful proportion of the funds with the neighbourhood where the development has taken place. They stated that Kessingland has lost out on additional funds for Parish Councils who have a Neighbourhood Plan in place and highlighted the Kessingland Neighbourhood Plan contains proposals from the community which would generate CIL which should be passed to Kessingland Parish Council.

North Cove Parish Council stated the money raised won’t be enough.

Southwold Town Council highlighted a lack of investment in waste water reticulation and treatment and sustainable transport infrastructure in Southwold and Reydon. They view a difficulty with CIL in the generation of an ad hoc approach and failing to take account of incremental and cumulative impacts of development and the strain on infrastructure such as wastewater treatment. They highlighted that the cost of upgrading infrastructure may exceed the amount of CIL raised by development and the need for housing can mean that development will go ahead and increase strain on infrastructure. They stated that infrastructure should be put in place before development takes place. Project planning and financial modelling need to encompass incremental development and infrastructure requirements which may be physically separated from the development site (e.g. development of St Felix playing fields using wastewater treatment plant in Southwold).
Developers/Landowners

Badger Building commented that CIL is the only system available at present but it has shortcomings. Paperwork is unnecessarily complicated and repetitive. Rates must be set carefully to make development of sites viable. The existing rates seem to be appropriate but increases may change this. It will take many years to build sufficient funds to achieve worthwhile infrastructure. Prudential borrowing against the income stream might be a way forward to fund larger projects.

Gladman Developments stated that since 2013 CIL rates have increased by 19.8% due to the inflation index. The Council should review its charging schedule to ensure viability of development proposals is not threatened in the future.

Larkfleet Homes recommended the Council should consider a bespoke approach to infrastructure contributions where on-site provision achieves greater public benefits. They have no objection in principle to a CIL but comment that it is not necessarily appropriate to apply CIL rigidly or without exception where on-site provision can deliver greater benefits. They stated their development proposal at Beccles seeks to provide a comprehensive sustainable new community which will make provision for community facilities on site which would benefit future residents of the development as well as existing communities. Proposed community facilities include a school, community/indoor sports building, playing pitches, allotments, public open spaces and a possible doctors/dentist surgery which will provide significant wider public benefits. Larkfleet stated the proposal would not generate any significant detrimental impacts on existing infrastructure which would require mitigation. They consider that a CIL 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 from the development should be considered as more appropriate for the development.

Wellington Construction commented that it is early days for CIL but in a largely rural area it is the worst of all worlds. CIL is inflexible, too long term in accruing funding for projects, there is likely to be a gap in funding and there are unfulfilled delivery issues.

Other Organisations

No comments were made in response to this question.

Members of the Public

There have been mixed responses to this question from members of the public.

One person has said that CIL is a disincentive for developers to build houses. Another person has said that CIL doesn’t appear to be the most appropriate way of securing new infrastructure based on the current state of infrastructure. Infrastructure should be guaranteed before development is granted planning permission. For example, development in Lowestoft should take place to the north of Lake Lothing until
the third crossing is guaranteed. One member of the public commented that CIL may help progress unsuitable development adding that CIL is not high enough and also too haphazard to be a reliable funding source. Another person is not supportive of CIL as it is non-negotiable and is not tailored to actual needs for a site or area. They suggested that some areas should be excluded from CIL such as poorer areas in order to encourage growth and rates should not be any higher.

Two people commented that CIL amounts are very small compared to the strain development places on infrastructure and CIL may not be sufficient by itself.

There was some support for CIL. Several members of the public stated that CIL is an appropriate mechanism but also added the rate needs to be regularly assessed against market conditions, development costs and values etc. to ensure development remains viable. The Council needs to remain responsive to requests to vary levels of Affordable Housing where viability is an issue. Members of the public highlighted the need for developers to contribute to infrastructure and one person stated that CIL must be applied to all developers equally. Another member of the public commented that CIL is probably the only method but adds significant costs onto free market housing along with Affordable Housing.

Some comments said the CIL rate is sufficient and there was support for distributing CIL funds more evenly around towns and villages and not concentrated on Lowestoft. Another person commented that the rate of CIL should reflect how well the development meets the identified needs of the community (i.e. if the housing mix reflects local needs the rate should be lower and if not a higher rate should apply). Consideration should also be given to including green and/or leisure spaces that make provision for the wider community. One member of the public highlighted the need for a bus shelter opposite Lowestoft railway station to encourage joined up public transport. The railway station requires updating to reflect its historic and iconic status.

**How these comments have been taken into account in the First Draft Local Plan**

There was a mixed response to this issue. Policy WLP1.4 states that the Community Infrastructure Levy and any replacement to it will continue to be used as the main source of funding for the provision of infrastructure off-site. The Policy and the supporting text makes clear that the levy may need to be reviewed for larger sites where a more bespoke approach to contributions which can effectively deliver infrastructure on-site may be more appropriate.

**Q20 How can sustainable modes of transport be encouraged?**

27 respondents

**Statutory Consultees**

The Environment Agency encouraged strategically planned green and blue infrastructure in development which encourages walking, cycling and general well being improvements. Blue infrastructure also encourages urban water system interaction. Green infrastructure, green spaces and other environmental features can be designed into and managed as a multifunctional resource capable of delivering ecological
services and quality of life benefits required by communities and to underpin sustainability. They encouraged the setting out of opportunities to create new habitats that will provide multiple benefits for example as part of green infrastructure, flood alleviation or Sustainable urban Drainage Systems as the first method of surface water disposal and green infrastructure as part of this. Reference to the Biodiversity Planning Toolkit was recommended. It was highlighted that green infrastructure that contributes to protecting and enhancing water bodies (and the mechanisms required to deliver this) should form an integral part of the plan. The Environment Agency encourage inclusion of a policy to promote appropriate green and blue infrastructure in new development which could include de-culverting, creation and management of ecological buffer strips and corridors, new wetland areas to help manage flood risk and reduce diffuse pollution whilst re-connecting people with nature.

**Parish and Town Councils**

Carlton Colville Town Council recommended provision of cycle paths and the widening of pavements.

Ilketshall St Margaret Parish Council recommended improving the provision of safe cycling routes and public transport serving smaller settlements where residents don’t have or want vehicles.

North Cove Parish Council stated that housing should only be built where there are employment opportunities.

Oulton Parish Council stated the cost of a bus journey into the town centre is too high and encourages people to use their cars instead. Making all journeys one set amount would encourage people to use buses.

Southwold Town Council stated that Southwold could have an environmentally sensitive car park on the Millennium Trust Field. Better signage, an integrated approach to discourage car use, safe walking and cycling routes, more cycle racks, and more cycle hire facilities should all be provided. In Southwold and Reydon a cycle/footpath linking St Felix to Blyth Road and Southwold town centre is a priority. More all-weather mixed pedestrian/cycle routes link development with popular destinations should be created with the involvement of Sustrans and landowners.

Southwold Town Council commented that new development should respond to best practice urban design guidance and be configured and designed to encourage walking and cycling. Streetscapes should be diverse and interesting with landscapes, trees and space for individual front gardens. Development should be located near to shops and small shopping areas should be provided as part of developments. There should be more public sector support for an integrated rural bus and rail service that can transport bicycles and supports travel to places of work, education and leisure.

**Other Organisations**

Beccles and Bungay Cycle Strategy recommended a 20 mph speed limit in residential streets and reduced speeds limit on rural roads. Cycle routes should be direct, continuous, attractive and safe. Sustainable
modes of transport should be put first in planning new developments in terms of access and parking. Reduce the need to travel and promote “active travel”. Manage demand by restricting access and parking for motorised vehicles. Encourage car-free development in town centres.

Developers/Landowners

Badger Building Ltd commented that Lowestoft has above average cycling rates and connectivity is generally good. Links between Harbour Road, over the railway, to Normanston Park should be improved along with better signage. Consideration should be given to electric car charging points in future development.

Bourne Leisure endorsed the proposed approach to increase sustainable modes of transport, however, they emphasise that some land uses, such as tourism, there is often no feasible alternative to the private car for reaching more remote areas. This should be supported with policy and supporting text in the Local Plan.

Larkfleet Homes highlighted that a development strategy which provides for significant growth at Beccles supports the promotion of sustainable modes of transport by ensuring 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 (site 82) would provide cycle routes to connect with the existing cycle network and would enable improved connections between the town and Ellough Industrial Estate and Enterprise Zone thereby helping to promote more sustainable options for travelling to work. Similarly, pedestrian routes within and adjoining the site would be enhanced. In addition, the development would make provision for enhancing and improving bus services to provide public transport service to/from the site and connecting to Beccles town centre, Ellough Industrial Estate and surrounding towns and villages. Furthermore, the proposed development offers on-site community facilities which would benefit future residents of the site as well as existing nearby residents, promoting walkable services.

Lawson Planning Partnership commented that development needs to be situated where it is well located to public transport networks in order to encourage sustainable transport choices over private and single occupancy car journeys. Allocating new development in sustainable locations within walking and cycling distance of key services and facilities is important to encouraging more sustainable transport choices, minimising the need to travel and is in accordance with nation planning policy in the National Planning Policy Framework.

Members of the Public

There was support for putting sustainable modes of transport first in all new developments. New development is one of the best ways to provide cycling infrastructure as it can be built in from the concept stage. Members of the public said that sustainable modes of transport should be promoted and encouraged by making it safe, convenient and affordable and new developments must improve cycle routes. Development should be located close to Lowestoft or the market towns rather than more remote villages. Development on a public transport route or within cycling distance is preferable.
It was highlighted that storage and parking of bicycles is very important and cyclists should be included in discussions. Residential developments should have safe, weatherproof storage with easy access to the highway for each dwelling and preferably not communal. Places of work and visitor attractions should provide secure, weatherproof parking. The parking compound at Lowestoft station is a good example of high quality visitor cycle parking. One person added that increasing cycling requires political will and courage.

Several people commented that trains and buses should be better co-ordinated, more frequent and cheaper and access to railway stations should be improved. Public transport could be made more affordable through subsidies raised through congestion charging and increased car parking charges. There were suggestions to regenerate the rail link with Lowestoft port to take freight off the roads and resolve delays from rail services in Oulton Broad. It was stated that buses are good for pensioners who don’t pay for tickets but expensive for those who do. People’s behaviour on public transport needs to improve as this can put people off using public transport. A Park and Ride scheme in Beccles would help link the town centre and development to the southeast of the town.

There was support from members of the public for cycle paths such as multi-use pathways alongside roads, particularly linking schools and connecting outlying villages with market towns. Several people have stated that these should be genuine cycle paths and not just taken from existing roads using white markings. It was recommended that they should be direct, safe, attractive and ideally traffic-free. Contra-flow lanes on one-way streets, the introduction of 20 mph limits on residential streets, reduced speed limits on rural lanes and inclusion of cycle lanes on the Lowestoft third crossing have also been suggested.

One person queried the need to create entirely separate cycle lanes and remove cyclists from roads and commented that cycling safety is not improved if cyclists are removed from roads where traffic levels are not intolerably high. There cannot be off-road facilities everywhere and more cyclists on the roads create safer cycling. Several people commented that Beccles lacks safe cycle routes serving the town centre and the primary and high schools creating higher car use. Near the industrial estate Ellough Rd is fast and narrow and unsafe for cyclists and pedestrians.

There was support for direct, safe, attractive and ideally traffic-free routes for pedestrians including pedestrianised areas in towns and villages. One person recommended that traffic management should be improved in town centres and footpaths should be widened in town centres so that pedestrians dominate rather than traffic and quality of Conservation Areas will be maintained. Another person commented that private vehicles should be restricted in urban areas. This will improve people’s health and well-being and improve footfall for shops. Charges for on-street parking should be introduced to control parking. One member of the public highlighted that there seems to be little cycling or walking provision when roads are upgraded.

How these comments have been taken into account in the First Draft Local Plan
Most comments support the increase in provision of cycle paths and improvements to existing ones. The provision of green infrastructure was also encouraged. Policy WLP8.21 addresses these themes and requires developers to specifically consider the Waveney Cycle Strategy. Policy WLP8.32 on Biodiversity encourages the consideration of the Waveney Green Infrastructure Strategy.

It is not possible for the Local Plan to set prices of bus tickets or set speed limits as suggested by some consultees.

The First Draft Local Plan acknowledges that tourism uses may need to be located in areas only served by the private car. Policy WLP8.15 allows for small scale tourist accommodation in remote areas.

Sites allocated in the Local Plan all have good walking and cycling access to at least some services and facilities.

Q21 What infrastructure is required in your area? (66 respondents) Q22 What infrastructure do you think would be needed to support the growth scenarios? (57 respondents)

Statutory Consultees

The Environment Agency stated they have a focus on the provision of waste water infrastructure and this should be considered as a strategic priority in the Local Plan. In considering the Local Plan the LPA should take into account the ability of existing wastewater treatment works and sewerage network to accommodate additional growth having regard to both quality and capacity. Additional capacity may be required to serve the increased housing numbers. The LPA should assess the impact on the receiving water environment and practicalities of water companies providing necessary upgrades where this is the case. They would like to see a policy that encourages all developments to connect to the public sewerage system rather than allowing a proliferation of private treatment plants.

The Environment Agency stated that in several of the scenarios, water recycling centres (WRC) will need to be upgraded and will need new environmental permits to operate at the higher volumes and meet tighter water quality standards. WRC will require an upgrade under option 2 with higher development for Beccles and Worlingham. Lowestoft will require a new permit and possible upgrade for all of the growth scenarios. If rural development is undertaken around Worlingham this will need a new permit and works upgrade. Some other smaller works may need revised permits in response to rural development.

The Environment Agency would expect the Local Plan to consider the existing water and wastewater infrastructure and whether there is capacity for housing growth. The Local Plan will need to take in to account phasing of infrastructure or capacity which should be addressed by policies in affected settlements. The planned Water Cycle Study will help address these issues and identify areas of concern.
and capacities. It was suggested that all areas of proposed development are assessed as part of the Water Cycle Strategy for the proposed numbers.

The Environment Agency continued to comment on Catchment Delivery. They stated that the Local Plan will need to consider the impacts of growth on the Water Framework Directive (WFD). The WFD, through the River Basin Management Plans, sets out environmental objectives which will need to be met for surface and ground water bodies. Waveney will need to ensure that all plans and policies comply with the objectives of the WFD which means there must be no deterioration in WFD status from the 2009 baseline. Achieving a Good Ecological Status by 2027 or before must also not be compromised. The river Waveney is currently at Moderate Ecological Status. A cost-benefit analysis of achieving a Good status revealed the measures required to achieve this.

The Environment Agency provided comments on some of the settlements as follows:

**Lowestoft:** The Lowestoft Flood Risk Management Strategy is investigating ways of reducing the tidal, fluvial and surface water flood risk. It will be important to utilise the modelling and evidence base when understanding flood risk to the town to ensure consistency. It will also be important to ensure that opportunities to reduce flood risk through future development sites are pursued. Carlton Colville and Kirkley Stream are known to suffer from surface water flooding and flooding from the Stream. Sites 34 and 35 as well as the large proposal between the A12 and A146 could offer the opportunity to reduce existing flood risk and implement some early concepts from the Lowestoft Flood Risk Management Strategy. Surface water drainage for future developments in this area will need to be strictly controlled in consultation with Suffolk County Council as Lead Local Flood Authority. If a tidal barrier were to be constructed in Lowestoft the Local Plan would need to consider residual risk (e.g. were there to be a flood greater than designed for or if the barrier failed to close what would the risk be and how will planning policies address this?).

**Halesworth:** A site in the town centre was identified to be located on a flow pathway during times of flood. Development of this site could offer the potential to reduce existing flood risk. It is not currently shown as land for potential development.

**Beccles:** Sites to the south of Beccles all appear to drain through the town to the north. The management of surface water will be needed to ensure there is no increase to risk but ideally improvements would assist. Discussions with Suffolk County Council will therefore be important.

Essex and Suffolk Water stated they have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP). The WRMP shows how they intend to maintain the balance between supply and demand over the next 25 years. Beccles with Worlingham, Bungay, Halesworth, Southwold with Reydon, Kessingland, Barnby/North Cove, Blundeston, Corton, Holton, Wangford and Wrentham are all located within the Suffolk Northern Central Water Resource Zone. The WRMP shows a supply surplus over the extent of the planning horizon.
NHS Great Yarmouth and Waveney Clinical Commissioning Group (NHSGY&WCCG) commented these is good and proportionate healthcare coverage and the Local Plan must take into account the capacity and locations of existing healthcare infrastructure when considering options for growth. The proposed growth across the region will have a significant impact upon future healthcare provision. Existing primary care capacity is constantly under review and capacity will be reviewed to accommodate growth in the medium to long term. The Clinical Commissioning Group (CCG) are working on an overarching Strategic Estates Plan and are bidding for funding to support Primary Care capacity. Existing health infrastructure will require investment and improvement to meet the needs for the growth options in the Local Plan consultation. If unmitigated, the impact of the proposed developments would be unsustainable.

The NHS Great Yarmouth and Waveney Clinical Commissioning Group go on to say that care should be taken to ensure the four strategic outcomes of the Suffolk Health and Wellbeing Plan are taken into consideration throughout the Plan process. Where development is planned in locations where healthcare service capacity cannot meet its needs mitigation must be considered and policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development’s sustainability with regard to continued healthcare provision. The exact nature and scale of the contribution will be calculated at an appropriate time when schemes come forward over the plan period. The Local Planning Authority should have reference to up-to-date strategy documents from NHS England and the CCG which currently include: the Sustainability and Transformation Plan, the Five Year Forward View, the GP Forward View, and the Local NHS Great Yarmouth and NHSGY&WCCG Strategic Estates Plan. The Local Plan documents should not commit the CCG or NHS England to carry out certain development within a set timeframe and should not give undue commitment to projects. There should be a reasonably worded policy within the Local Plan that indicates a supportive approach from the Local Planning Authority to the improvement, reconfiguration, extension or relocation of existing medical/health facilities. This positive approach should also be applied to schemes for new bespoke medical facilities where such facilities are agreed in writing by the NHSGY&WCCG and NHS England.

The NHSGY&WCCG identified the anticipated impact on health infrastructure arising from the Local Plan proposals. The exact nature and mitigation required will be calculated at an appropriate time when schemes come forward. The NHSGY&WCCG would welcome future details of the Local Plan so that they can respond. NHSGY&WCCG support the growth required for the Waveney area, however, further consultation and dialogue is required when further details are available.

Suffolk County Council (SCC) commented they have a legal duty to ensure provision of education from ages 2 to 16. The National Planning Policy Framework (NPPF) paragraphs 38, 72 and 203-204 sets out the role for the planning system to provide education facilities and minimise travel. Safe routes to school are necessary, otherwise the education authority must bear the cost of school transport.

SCC continued to say the scale and distribution of housing growth can be managed in relation to school places. There are implications arising from the different options for funding additional school places through development. The actual need will depend upon the location of development, forecast pupil numbers, and available capacity. Further detail will be provided as the Local Plan review progresses. SCC provided broad early years and school place requirements for the district.
SCC commented on library provision and stated they will identify library provision required to support growth as the Local Plan review progresses. Existing libraries may be improved or libraries may be required on site in some cases.

SCC highlighted they are the Lead Local Flood Authority for flood risk arising from sources other than rivers and the sea.

SCC commented on infrastructure provision around some of the sites. Sites 63, 42 and 129 around Blundeston have limited amenities and services within reasonable distance and some of the road network may not be of sufficient standard or capacity. If this scale of development is to be brought forward a comprehensive review of transport issues will need to be undertaken. They added that growth in Southwold and Reydon should be limited to meeting immediate local needs as there are no rail connections and the vehicle access is limited to one road into and out of the area which is subject to flooding. The resilience of local infrastructure will need to be considered and the County Council will assist with this. Site 6 does not appear to be connected to the highway. The proposed level of development in Bungay is accepted in principle. However, access constraints are likely on site 39 as any proposed access onto Annis Hill would require widening the road. This site should provide its main access from B1062. SCC welcomed the reference to the Southern Relief Road in Beccles and commented that (subject to further studies) the proposed level of growth around Beccles is generally acceptable with the exception of sites 124, 50, 71 and 77 since these are further out from the town centre and less likely to encourage sustainable travel choices. The proposed developments at Halesworth and Holton are acceptable in principle, subject to further assessments through the planning process.

Parish and Town Councils

Carlton Colville Town Council stated that it would be difficult to expand the road infrastructure as houses are in the way and add that there is a problem with the road system leading to the primary school. Drainage needs to be greatly improved to stop flooding that has been exacerbated by housing over the past twenty years. Facilities for young adults should be provided. Housing developments have too little space for children and young adults to get fresh air. Open spaces in Carlton Colville have run down and have poorly maintained equipment and serve mainly dog walkers. Carlton Colville Town Council stated that improved drainage, roads and facilities for young people would be needed along with retention of the character of the place.

Halesworth Town Council commented that infrastructure is a serious impediment to development in the town. Development of employment opportunities is needed and there needs to be a strategy to attract business to the town led by District and County Councils. Both primary schools are at capacity and there is no secondary school so pupils have to be bussed to Bungay. A new medical facility with hospital level facilities is needed. The sewerage system needs updating and there are flooding issues which need addressing.
Ilketshall St Margaret Parish Council commented that a bus link a couple of times a week to Bungay and Beccles is needed and a re-think of the Bungay one-way system. Ilketshall St Margaret Parish Meeting commented that public transport should be improved including the rail link from Norwich to London.

Kessingland Parish Council commented they currently have poor roads, health and education facilities, sewerage/foul water drainage, transport and retail outlets. The Kessingland Neighbourhood Plan contains policies to address housing, transport, business and employment, leisure facilities, environment, tourism and flooding/drainage.

North Cove Parish Council stated that doctors, dentists, teachers, more police, better roads and rail services are needed. North Cove Parish Council commented the Third Crossing, doctors, dentists, teachers and tourists are needed.

Oulton Parish Council wanted to see improvements at the following junctions which will see more traffic with the Woods Meadow development:
- Gorleston Road/Dunston Drive;
- Gorleston Road/Sands Lane;
- Gorleston Road/Hall Road;
- Gorleston Road/Mobbs Way.
Traffic heading south will suffer delays due to the level crossing and Mutford Lock Bridge in Oulton Broad. Promised improvements to traffic waiting times at Oulton Broad are long overdue. Signs should be erected to direct HGVs away from Oulton Street which is too narrow for large vehicles. Oulton needs a medical centre with the closure of the Oulton Medical Centre and progression of the Woods Meadow development. The proposed primary school on the Woods Meadow development will not arrive in time to accommodate the children on the development. The Community Centre in Oulton is almost full and will not be able to accommodate residents from the new development. Oulton Parish Council request the highway review bond which is part of the Woods Meadow section 106 agreement should be called in now and improvements should proceed as soon as possible. Oulton Parish Council stated they do not believe Oulton can grow any further after the 800 homes at Woods Meadow. Road infrastructure is inadequate and even with improvements it would be unable to accommodate further housing. Improvements to Oulton Broad North rail crossing to reduce the amount of time the line gates are down would help reduce traffic queues significantly. The Third Crossing would reduce journey times and traffic queues and may help attract businesses to the area.

Southwold Town Council commented that the Local Planning Authority should liaise with private sector infrastructure providers to ensure that development does not exceed infrastructure capacity. They highlighted the most pressing need is for improved waste water drainage and treatment along with sustainable transport infrastructure to reduce car use. An additional safe cycling route linking Southwold and Reydon and parking and cycling infrastructure in Southwold and Reydon is required. Recent developments in Reydon and Southwold have put strain on the waste water treatment system and there have been examples of flooding, drainage and sewerage problems reported. Future growth should not
take place without improvements to the waste water treatment works. They highlighted the need to incorporate ‘hidden’ infrastructure needs into plans and policies in the new Local Plan. Southwold Town Council stated that improved broadband, mobile phone reception, and public transport links to Norwich, Ipswich and London are needed. Better road networks, sewerage infrastructure and parking are required.

St James South Elmham Parish Council stated that high-speed broadband is of high importance. They also highlighted that repairs to potholes and provision of more passing places is more important than new roads. St James South Elmham Parish Council commented that it is unlikely additional infrastructure would be needed to support the options for growth.

Ashby, Herringfleet and Somerleyton Parish Council raised concerns about safety on the B1074. Safety should be improved before more houses are completed at Woods Meadow or north Lowestoft. They suggested the B1074 should retain rural characteristics and heavy goods vehicles should be prohibited. There is little employment or public transport in the three parishes.

**Other Organisations**

Beccles and Bungay Cycle Strategy stated there is a particular need to connect Beccles with the Ellough Industrial Estate via Ellough Road. They commented that the Beccles Southern Relief Road will provide some cycling infrastructure but it will not continue alongside Benacre Road to the Industrial Estate and it does not help the connection to Beccles along Ellough Road. They stated this is perhaps the single most needed piece of cycling infrastructure in the Beccles area. They also highlighted that in Bungay site 45 provides the opportunity to link Kings Road with Meadow Road and Joyce Road which is a much needed link. Beccles and Bungay Cycle Strategy highlighted that a link between Beccles and Ellough Industrial Estate is vital to connect pedestrians and cyclists with residential and employment areas.

The Beccles Society suggested a mini park and ride scheme to serve growth in Beccles as there will be insufficient car parking in the town centre. There is no land in the centre of Beccles for more car parks. New supermarkets, leisure and health facilities should be provided in significant housing developments. The existing highway network and car parks would be difficult to improve.

The Halesworth and Blyth Valley Partnership commented there is a need for increased educational provision following the loss of the Middle School. Green Infrastructure is needed. A new health care facility will be needed if Patrick Stead hospital closes. Phase 2 of the relief road should be reviewed and revisited before designation of new development. A strategy to bring new businesses to the town is needed. The sewerage system should be expanded to contend with new housing and flood remediation work up-stream of Halesworth should take place. The Halesworth and Blyth Valley Partnership commented there is a need for increased educational provision following the loss of the Middle School. Green Infrastructure is needed. A new health care facility will be needed if Patrick Stead hospital closes. Phase 2 of the relief road should be reviewed and revisited before designation of new development. A strategy to bring new businesses to the town is needed. The sewerage system should be expanded to contend with new housing and flood remediation work up-stream of Halesworth should take place.

The Lowestoft and Waveney Chamber of Commerce stated the following infrastructure requirements:
- Remove the constraints to economic and employment development within the areas designated through; the Lowestoft Lake Lothing & Outer Harbour Area Action Plan; and the Gt Yarmouth and Lowestoft Enterprise Zone.
- As a matter of high priority, widen the port access channel in the vicinity of the existing bascule bridge in order to stimulate offshore and marine-based economic activity on the allocated land to its west.
- Support improvements to the A146 between Barnby and Carlton Colville to improve access to the section of the Enterprise Zone at Ellough Business Park.
- Support the proposed Lowestoft flood defence scheme aimed at protecting the built, road and rail infrastructure from the adverse effects of tidal, pluvial and fluvial flooding.
- Ensure that services to all employment sites are adequate for present and future needs, to include electrical supplies, broadband and access to mobile technologies.

Southwold & District Chamber of Trade & Commerce commented that introduction of parking restrictions to provide spaces for residents should be carefully managed. Resources should provide maximum benefit for both residents and visitors who are important to the local economy. Introducing resident’s parking bays may exacerbate parking problems in the town causing significant economic damage. Careful consideration should be given to proposals to pedestrianise the High Street. This could be effective in summer but loss of parking spaces and lack of vitality could be an issue at quieter times. Southwold & District Chamber of Trade & Commerce commented that current infrastructure in the area will struggle to accommodate increased housing stock. Schools, healthcare and sewerage should meet the needs of an expanding population. Any growth in Reydon is likely to increase pressure on already stretched parking in Southwold.

Southwold and Reydon Society commented the road network around Southwold and Reydon is currently adequate but not suitable for significant growth. The sewerage infrastructure is at or beyond capacity which should restrict major development in the area. Parking is out of control in Southwold and planning policies must seek adequate off-street parking and better management of parking.

UK Power Networks commented they can support some further growth (residential and industrial) but there are constraints in terms of total increase in power demand. In the short to medium term UK Power Networks should be able to work with stakeholders to resolve reasonably sized developments and their power demands. There is a significant obstacle in getting power from Beccles town centre across the Network Rail infrastructure. If this can be achieved then it could unlock the door for the 1,000 new residential properties in Worlingham as well as further employment expansion. A copy of the Regional Development Plan was supplied with their comments.

**Developers/Landowners**

Larkfleet Homes commented that their public and stakeholder engagement showed that a primary school, playing fields and public open space would be appropriate as part of their development proposal (site 82) and would be welcomed by local residents. Discussions with healthcare providers are ongoing and provision could be made arising from the projected needs identified by the Clinical Commissioning Group.
Beccles is considered to benefit from good existing infrastructure and a strategy promoting growth at Beccles is deliverable and achievable. Focussing a substantial proportion of development in Lowestoft could be constrained, both in financial and delivery timescale terms, by the need to deliver significant infrastructure improvements (i.e. a new link road between the A12 and A146).

Lawson Planning Partnership commented that their site is well located to existing infrastructure and no new significant infrastructure would be required.

Badger Building commented there are doubts over the ability of the waste water infrastructure for Beccles and Bungay to cope with significant additional development. Early investigation is essential, identifying the cost of any upgrade. School planning will need careful thought. Significant development around the south of Beccles should include shopping and community facilities.

Members of the Public

Members of the public have put forward the following responses (divided into sub areas):

All of Waveney:

- Leisure facilities;
- Hospital;
- Larger/more doctor’s surgeries;
- Provision for elderly people;
- Dentists;
- More Schools;
- More police;
- No charging for first hour of car parking;
- More 20mph speed limits;
- Measures to discourage car use;
- More off-street parking;
- More roads;
- Improved bus network and public transport;
- Improved junctions on main roads;
- Dualling of the A12;
- More parking for householders;
- Improved cycleways;
- Upgraded sewerage system;
- Improved broadband;
- Better sports facilities including hockey pitches, swimming pool and indoor facilities;
- Light industrial development;
- Increase infrastructure spending outside of Lowestoft.

Beccles and Worlingham
- Medical centre;
- Beccles Southern Relief Road with good cycle links and a link for traffic going west on the A143;
- Indoor and outdoor sports facilities;
- Leisure facilities including swimming pool;
- Indoor children’s play area;
- A multi-use path alongside the B1062 between Beccles and Bungay;
- A safe cycling route between Beccles and Ellough Industrial Estate including Benacre Road and Southern Relief Road;
- More cycle paths;
- Flood defences.

Bungay
- New and expanded schools;
- Leisure facilities;
- Expanded doctor’s surgeries;
- Housing for the younger generation;
- A multi-use path alongside the B1062 between Beccles and Bungay;
- Parking for residential areas;
- A link from site 45 across St Johns Rd to Kings Rd.

Halesworth
- A secondary school;
- Hospital facilities;
- Swimming pool;
- Leisure centre;
- Better buses and trains;
- Off-road bus stop in town centre;
- Rehabilitation and convalescence facilities;
- Roundabout or traffic lights in Old Station Road to support development.

Lowestoft
- No more traffic lights;
- Bigger shop brands;
- More industry and employment;
- Cycle bridge of Lake Lothing and railway line along with links to Harbour Road;
- A new bridge near Wickes;
- Improvements to the level crossing in Oulton Broad;
- Flooding improvements at Nicholas Everitt Park, Bridge Road and Mutford Lock.

Redisham
- None required.
Somerleyton
- New village hall.

Southwold and Reydon
- Improved roads;
- Improved car parking;
- Network of cycle paths;
- No cuts to bus services;
- Improvements to sewerage and surface water drainage systems;
- Improved access to the A12;
- Modern street furniture is not wanted;
- High speed broadband.

General comments about what infrastructure is needed to support future growth:
- Leisure facilities;
- Sport facilities including hockey pitches and a swimming pool;
- New/larger hospitals;
- More doctor’s surgery provision;
- More dental facilities;
- Provision for elderly people;
- Open spaces, landscaping with trees, parks;
- More schools;
- Greater sewerage capacity;
- Better drainage;
- Flood defences;
- Improved water supply;
- Better electricity supply;
- Jobs;
- Shops;
- More cycle paths/routes;
- Improved bus network and support for sustainable transport, particularly between housing and retail/employment centres;
- Careful planning on brownfield sites;
- Road improvements;
- More parking;
- More passing places on the roads;
- More traffic speed restrictions;
- High speed broadband;
- Services;
- Free parking for 1st hour;
- No cuts to NHS and public sector.
Beccles and Worlingham
- Medical services;
- Dentists;
- Drainage;
- Improved cycle routes;
- A safe cycle/pedestrian route between Beccles and employment areas in Ellough and cycle links for the Southern Relief Road;
- Upgraded utilities;
- A pub;
- Improved road junctions;
- More parking;
- No development on flood plains;
- More facilities to the southeast of Beccles and Worlingham which would complement and reduce pressure on the town centre.

Bungay
- Leisure facilities;
- Doctors;
- School access;
- More roads;
- More car parks.

Oulton
- Sites in Oulton are unsuitable due to Woods Meadow development and high volumes of traffic.

Halesworth
- More health care;
- Education including a secondary school;
- Off road bus stop in town centre;
- Improved cycle connections;
- Leisure facilities including a swimming pool;
- More parking;
- Improved road network.

Lowestoft
- Development to the north of Lake Lothing if there is no third crossing;
- Re-opening of the Lowestoft to Yarmouth railway line.

Redisham
- Sewage treatment works;
- Extra school places;
- Access to health services;
• Improved roads;
• Public transport;
• Local shop.

Somerleyton
• Buses;
• Expanded school;
• Mobile phone reception.

Southwold and Reydon
• Improved main and local roads;
• Improved parking;
• Improved sewage treatment facilities;
• Consideration of the impact of growth on schools, medical facilities and transport;
• Widen the Wrentham to Southwold road.

How these comments have been taken into account in the First Draft Local Plan
Requirements for all types of infrastructure associated with planned growth have been assessed in the First Draft Local Plan Infrastructure Study (2017). The specific infrastructure required in each settlement is also identified within the Local Plan in the strategy sections for each town.

The Waveney Water Cycle Study (2017) assesses the capacity of wastewater treatment/recycling works/centres and the sewerage network. Policy WLP1.4 states that developers should ensure there is capacity in the water recycling centre and the wastewater network. Where improvements to wastewater infrastructure are required, these have been highlighted in the strategy sections for each town.

Policy WLP2.15 allocates land for a strategic residential development of 800 homes. This allocation includes land for flood mitigation as noted by the Environment Agency. This will also help address the concerns raised by Carlton Colville Town Council. The site also provides land for a community centre which could benefit young adults and provides significant amounts of open space for different types of users.

Policy WLP3.1 allocates land for a Garden Suburb of 1250 new homes south of Beccles and Worlingham. As part of this, a new school, open space and sports facilities, retail facilities, a community centre will be provided. Additionally, a cycle link to the Ellough Industrial estate will be provided.

Policy WLP4.1 allocates land for a mixed use development and will facilitates the provision of new health facilities in Halesworth as well as new sports facilities.

Housing development proposed in Somerleyton will help fund a new village hall.
Q23 What are the new development and regeneration opportunities in and around Lowestoft arising from a new crossing over Lake Lothing?

13 respondents

Statutory Consultees

No responses.

Parish and Town Councils

Carlton Colville Town Council commented there is very little existing industry and this is not enough to sustain the local population.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented the Third Crossing may provide a solution to current traffic problems but they fail to see how it opens up regeneration opportunities unless it can also serve as access for Brooke Peninsular. If so it may assist in bringing forward housing development provided any contributions for the development are minimal.

Members of the Public

Members of the public identified a number of benefits which could arise from the Third Crossing. People commented the Third crossing would improve existing traffic problems and the area around the crossing will become more attractive to business users. This could lead to regeneration opportunities around the centre of Lowestoft, especially brownfield sites around Waveney Drive. Furthermore, with traffic moved away London Road South the Kirkley shopping area and the South Beach would be open for redevelopment and possible pedestrianisation. North Quay retail site and Oulton Broad could both benefit from better and more diverse retail options and improved civic options such as an improved library would be good.

One person suggested the Third Crossing will create more traffic and discourage people from coming to Lowestoft. Another person added that development should be focussed to the north of Lowestoft and only takes place to the south once the crossing is guaranteed. With the crossing in place further development would be possible to the south of Lake Lothing and on the A12 south of Lowestoft.

There was a suggestion for the existing harbour bridge should be closed to cars once the Third Crossing is built, with Lorries using it for access. This would encourage people to walk, cycle or use buses. Another
suggestion was to use places such as Manchester, Liverpool or Rotterdam for inspiration. Publishing a timetable of bridge closures could help people to plan around the bridge closures.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP1.4 of the First Draft Local Plan states that the Council will work with partners to ensure the delivery of the Third Crossing and ensure that it is a success.

Q24 What are the opportunities arising from the Beccles Southern Relief Road for development in and around Beccles?
22 respondents

Statutory Consultees
No responses.

Parish and Town Councils
Carlton Colville Town Council stated there is very little existing industry and not enough to sustain the local population.

Ilketshall St Margaret Parish Meeting commented the relief road looks like it will increase opportunities for both commercial and residential development whilst enhancing the town.

Other Organisations
Beccles and Bungay Cycle Strategy commented that development between Beccles and the Southern Relief Road should only allow motor vehicle access from the Southern Relief Road and not via existing residential roads. These should only be used for pedestrian and cycle access. A 20mph speed limit on all residential roads, a 30mph limit on strategic routes through the town and weight limits should be applied to roads in Beccles. The A145 must be diverted along the Southern Relief Road and Copland Way.

Developers/Landowners
Badger Building commented the Southern Relief Road provides an opportunity to service additional housing land to the south of Beccles as well as providing a link for lorries. The reduction in traffic in the town centre should be welcomed.

BKW’s agents commented that access to their site at Ellough Airfield (site 61) will be improved with the delivery of the Southern Relief Road and allow 20 new companies to move to the site creating over 1200 jobs and a boost to the local economy expected to be worth millions of pounds. It also means less congestion for Beccles as traffic will no longer need to travel through the town centre.
Larkfleet Homes commented that the forthcoming Southern Relief Road presents an opportunity to enhance the southern side of the town and the Ellough Enterprise Zone by improving access to and from the area, reducing traffic congestion through the town and removing heavy goods vehicles from the town centre. It promotes the prospect of improvements to accessibility between the town and the Ellough Industrial Estate by enabling improved cycle/pedestrian connections along Ellough Road. Larkfleet’s proposed development (site 82) would complement and supplement these connections and promote accessibility from the proposed development and the wider town beyond. Furthermore, the relief road 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.

**Members of the Public**

Members of the public have identified benefits from the construction of the Southern Relief Road in that it would remove Heavy Goods Vehicles from the centre of Beccles, make the centre of Beccles more pedestrian and cyclist friendly, ease traffic issues in the town centre and in the surrounds, support jobs growth around the Ellough Industrial Estate, provide better access around the south of Beccles, provide more cycling routes and improve sustainable transport options such as cycling and buses. It has been commented that tourism could improve and a leisure centre would be well accessed here.

Members of the public identified that the area between the Southern Relief Road and the edge of Beccles would be beneficial due to good road access and no areas of special habitat or landscape interest. Although comments identified that development should not extend beyond the relief road. People said that vehicular access to new development in this area must be on the Southern Relief Road and the existing residential roads should be used for pedestrian and cycle access only. Residential streets in Beccles should have a 20mph speed limit and 30mph limit and weight restrictions on other routes through the town. The A145 must be diverted along the Southern Relief Road and Copland Way. Community facilities, infrastructure, a park and ride, retail, leisure, green spaces and sports facilities should be provided as part of large scale development.

Some people raised concerns over the amount of development that construction of the relief road may lead to and commented that growth should not exceed 20% of the existing population/housing stock of Beccles. Construction of the Southern Relief Road should not provide a reason to encourage large scale development. Concerns were raised the entire area between the Beccles and the relief road may be developed. One person commented that industrial smells may be an issue with development around Ellough.

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**How these comments have been taken into account in the First Draft Local Plan**

The Council agrees with the benefits identified by the community which the Beccles Southern Relief Road will bring. Policy WLP1.4 of the First Draft Local Plan states that the Council will work with partners to ensure the delivery of the road and ensure that it is a success.
Policy WLP3.1 allocates development between the relief road and the existing built up area. The policy states that access to the development area should be from two points along the southern relief road.

Q25 What are the new development and regeneration opportunities in and around Lowestoft arising from increased flood protection?
8 respondents

Statutory Consultees

The Environment Agency identified the Strategic Flood Risk Assessment (SFRA) and Shoreline Management Plan are fundamental in providing the evidence base to make site level or community based assessments of issues relating to future flood risk management. The SFRA helps to demonstrate the potential change in flood risk over the next 100 years.

Parish and Town Councils

Carlton Colville Town Council commented that flooding will increase if there is more housing and queried what increased flood protection has there been in Carlton Colville.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented that flood protection for the town opens up the possibilities of development of both Commercial Road and Peto Road and this will be of benefit to the town. In addition it will reduce the cost of regeneration of the Brooke Peninsular and make construction on the site easier and less expensive.

Members of the Public

Members of the public commented that flood protection should help businesses in Lowestoft be more confident for the future and make Lowestoft more attractive for businesses. It could improve Station Square and make the town centre more attractive for visitors. There are opportunities to integrate some of the history of the town into the flood protection and make the past of Lowestoft an integral element rather giving the appearance of a decaying town and suggested a competition for imaginative schemes. One member of the public stated that Lowestoft will take a long time to recover from the last flood and it could happen again before improvements are made. The beach is in a poor state and more coastline would be lost were it not for private investments at Corton and Hopton.
How these comments have been taken into account in the First Draft Local Plan

The Council agrees with the benefits and opportunities identified above. Section 2 of the document continues with a regeneration strategy for the Central and Coastal Areas of Lowestoft. This strategy will benefit significantly from the flood risk management project.

Regeneration of Central Lowestoft

Q26 a) Should the Local Plan contain a detailed regeneration strategy for central Lowestoft? B) Should such a strategy be focused on the remaining Area Action Plan proposals or should it be wider to cover areas of the Town Centre, South Beach and Kirkley?

41 respondents

Statutory Consultees

The Environment Agency supported Area Action Plan (2010) policies and wished to see this level of detail retained in future policy making. The Environment Agency welcomed further consultation on specific details if these were to be changed in the New Local Plan.

Parish and Town Councils

St. James South Elmham Parish Meeting supported the inclusion of a regeneration strategy for Central Lowestoft, which should be widened to include the town centre.

Oulton Parish Council supported a strategy which focused on delivering the remaining Area Action Plan proposals.

Carlton Colville Town Council supported the inclusion of a regeneration strategy for Central Lowestoft, which should be broadened in scope to link the town centre, South Beach and Kirkley together.

Other Organisations

The Southwold and Reydon Society supported the inclusion of a regeneration strategy for Central Lowestoft but which was broader in scope to include areas of the town centre, South Beach and Kirkley.

The Lowestoft and Waveney Chamber of Commerce stated that they support the inclusion in the Local Plan of a detailed regeneration strategy for Lowestoft which should deliver the remaining Area Action Plan proposals but widened to cover all of the Town Centre, South Beach and South Quay.

Suffolk Wildlife Trust stated that any regeneration strategy for Central Lowestoft should ensure that the County Wildlife Sites are properly protected and managed.
Developers/Landowners

Badger Building stated that the regeneration strategy should focus on wider areas.

Members of the Public

Members of the public overwhelmingly supported the Local Plan containing a detailed regeneration strategy for Central Lowestoft. However opinion was divided between those who favoured concentrating on delivering sites included in the existing Area Action Plan and those who wanted to see the strategy broadened to include the town centre, Kirkley and South Beach.

How these comments have been taken into account in the First Draft Local Plan

Section 2 of the First Draft Local Plan includes a regeneration strategy for central and coastal Lowestoft. The strategy widens the area covered by the existing Lowestoft Lake Lothing and Outer Harbour Area Action Plan.

Q27 Should we continue to promote the development of a renewable energy and offshore engineering cluster at the PowerPark?

13 respondents

Statutory Consultees

The Environment Agency supported the promotion of the offshore energy sector. However it cautioned that the development of offshore wind can have environmental impacts which will require careful consideration. Landward infrastructure for offshore wind often required mitigation measures and therefore early engagement with the Environment Agency was recommended.

The Broads Authority questioned whether there was the potential for offshore wind proposals to affect The Broads. For example would power cables carrying electricity onshore pass through The Broads area? Policies concerning offshore wind infrastructure should take account of The Broads.

Parish and Town Councils

Carlton Colville Town Council supported the continued promotion of the PowerPark but also cautioned that it might not develop into a long term asset.

North Cove Parish Council stated the PowerPark was one of the few remaining sources of economic growth.

Other Organisations

No comments were made in response to this question.
Developers/Landowners
Badger Building supported the continued promotion of renewable energy and offshore engineering at the PowerPark.

Members of the Public
Members of the public supported continued promotion of the PowerPark provided that it was feasible to do so and that it was undertaken in cooperation with Great Yarmouth. Development of the PowerPark should be broadened to include different types of engineering and manufacturing. The benefits of offshore energy provision may dwindle in significance once the wind turbines are installed.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP2.2 continues to allocate the PowerPark for the development of a renewable energy and offshore engineering cluster.

Q28 Should we continue to promote retail and leisure development at Peto Square or should we promote a wider range of uses or a more leisure focused option?
10 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
Carlton Colville Town Council supported promoting retail and leisure development as well as a wider range of uses.

Other Organisations
No comments were made in response to this question.

Developers/Landowners
Badger Building stated that a wider range of development is needed because there are not enough developers in the market to support a narrow focus.
Members of the Public

Members of the public favoured redevelopment of Peto Square for leisure uses and questioned expansion of the town centre into Peto Square at a time when town centre shops were closing. Redevelopment of the railway station was regarded as preferable, in particular, it was thought sensible for the bus and railway stations to be located next to one another. One respondent favoured a wider range of uses, given the location of Peto Square and thought that South Beach and Kirkley shops would be a better focus for leisure activities. However another cautioned that Peto Square should not be committed to a particular type of use until the impact upon other parts of the town centre was understood. For them Peto Square would best be developed for leisure uses with some retail, provided that it did not impact upon the town centre or Kirkley district shopping Centre. Another response favoured retail and leisure development on the site and identified it as the gateway in to the town. Accessibility will need to be improved, in particular the road access to the site.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP2.3 of the First Draft Local Plan gives a greater focus to leisure uses and environmental improvements to the Peto Square site. The Policy still allows for retail development although does not take such a strong focus as the Area Action Plan policy. The policy also opens the scope for residential and hotel development once strategic flood defence measures are in place.

Q29 The former Jeld Wen Factory Site, which forms part of the Sustainable Urban Neighbourhood and Kirkley Waterfront site is currently proposed for waterfront employment and housing adjacent to Waveney Drive. Is this still the most appropriate use for this site?

13 respondents

Statutory Consultees

The Environment Agency has identified this site as being at risk from flooding and recommends that the sequential test is followed when designing the layout of the site. Commenting in any detail is difficult as a full flood risk assessment has not yet been completed. The Environment Agency advised the Council to revisit the sequential and exceptions work that was undertaken as part of preparation of the Area Action Plan and to be aware that site availability and circumstances will have changed in the last six or seven years. The Environment Agency welcomed further consultation about the site selection process once the strategic flood risk assessment is completed and site specific allocations are put forward in order to understand possible scenarios for employment and residential development and design layout for the area.
**Parish and Town Councils**

Carlton Colville Town Council supported the redevelopment of the former Jeld Wen factory for waterfront employment and housing uses.

**Other Organisations**

Suffolk Wildlife Trust stated that any regeneration of Central Lowestoft should ensure the County Wildlife Sites are adequately protected and managed.

**Developers/Landowners**

Badger Building stated that the site is an eyesore and that the Council should approach redevelopment of the site with an open mind.

Wellington Construction stated that delivery of large scale housing schemes in the Lake Lothing area appears unrealistic given the previous lack of progress.

**Members of the Public**

Members of the public expressed frustration that the site remained undeveloped and there was suggestion of focusing on other uses besides housing, such as employment and leisure uses. This site could be developed so as to enhance The Broads experience. 1380 houses on this site was considered excessive and it was thought best to provide open space and community facilities, notably nursery and educational facilities, community facilities and a landscaped park or play area. Respondents who did favour housing suggested either homes for the elderly or starter homes. One respondent suggested that high value homes would help to kick start regeneration in the area.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP2.4 of the First Draft Local Plan continues to allocate the Jeld Wen Factory site as part of a mixed use development of 1380 homes and employment development. The policy advises that employment uses should still be located on the waterfront on the Jeld Wen site. It is more flexible as to housing provision on this part of the site. A Strategic Flood Risk Assessment is currently under preparation.

**Housing**

**Q30** Should we continue to have a policy that requires a mix and type of housing based on assessment of local need, or should the housing market dictate what mix and type of housing is built?

36 respondents
Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented there should continue to be a policy that required a mix and type of housing based on assessment of local need.

Ilketshall St Margaret Parish Meeting stated that housing should be market led but include a proportion of affordable housing.

Kessingland Parish Council acknowledged that if development is of a different mix to the area then densities may differ. However, it is vital that the design of such developments does not have a negative impact on the area and its surroundings.

Oulton Parish Council commented that housing should be based on local need. Oulton needs housing for retired people wishing to downsize from large houses to small bungalows. If this type of housing was available for retired people it would release larger homes for families.

Southwold Town Council commented that for reasons outside the scope of this response the market does not deliver what is needed in housing. This necessitates retaining a policy that requires a mix of housing and types of housing based on assessments of local need.

Other Organisations

Southwold and Reydon Society commented that planning policies should continue to require a mix and type of housing based on assessment of local need.

Suffolk County Council commented that they are working closely with Local Authorities in order to meet the requirement set out in paragraph 162 of the NPPF ensuring that local need for adequate care and health provision is addressed. The reference to the ageing population is welcomed and the County Council will work further with the district to define what this may mean in terms of additional needs for housing and facilities for older people. As well as the size and type of dwellings, the growth in older households may also influence the spatial distribution. While the number of older people and older people with specialist housing needs is projected to increase significantly, there are also other groups that have housing needs such as adults and young adults that have to be considered. The County Council would favour a continuation of a mix of supply being required based on assessed local need and would specifically encourage that assessment of need to include both the needs of an ageing population and other supported housing needs. The assessment of the mix of supply should also incorporate location – with access to services and the availability of public transport being a vital component.
Developers/Landowners

Badger Building commented the market should decide this otherwise housing delivery will be held up.

Gladman Developments Ltd stated the starting point should be an assessment of local need in the Strategic Housing Market Assessment. However, this evidence will only take into consideration the housing need at a single point in time and is subject to changes in the demographic profile of the area over time. Therefore, any policy relating to the mix and type of housing will need to allow for a sufficient degree of flexibility so that it is able to react to changing circumstances. This should not limit the ability of a developer to put forward a scheme which contains an alternative mix such as instances where existing need is not being met, issues relating to viability or in circumstances where updated evidence identifies the need to divert from existing policy.

Larkfleet Homes commented the Council should avoid any prescriptive policy on housing mix. It should set a percentage target for affordable housing but recognise viability concerns, particularly given the lack of flexibility with CIL. The requirement to deliver a mix of housing based on need is consistent with national policy. Paragraph 50 of the NPPF requires Local Authorities to “plan for a mix of housing based on current and future demographic trends, market trends, the needs of different groups in the community and identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand.”

The NPPF therefore recognises that although Local Authorities should understand the need for particular types and sizes of home, and take steps to plan to meet this need, market trends and the type of product being demanded locally are also important considerations. Equally, different sites are more suitable for different types of property. For instance, town centre locations near to facilities may be more suitable for flatted developments with 1 or 2 bedroom units, whilst certain village locations may be more suitable for a mix with larger properties reflecting the character of the location. Therefore, the Council should avoid any policy which is over prescriptive in terms of the mix of dwellings required across all sites, allowing the market response to market demand and for schemes to be developed which are sensitive to their particular context.

Lawson Planning Partnership Ltd commented that the existing Local Plan policy sets requirements for housing type and mix based upon local need from the Housing Market Assessment and applies to developments throughout the district. They considered that there are different housing requirements across the district. On small-scale sites up to 25 units it is appropriate for the market to dictate and for housing to be market led with developers commissioning and undertaking market research to identify the most appropriate housing mix and type of housing to be included in any development proposal. On smaller sites it can be restrictive to enforce policy on mix and type of housing that relies on district-wide assessment of local need. Market research has been undertaken to identify the market demand in Lowestoft near to our client’s site (site 33) and any residential development will be developed to reflect these identified housing market requirements.

Rentplus commented the NPPF requires Local Planning Authorities to deliver a wide choice of homes. The mix and unit type proposed should be informed by the Council’s SHMA and other documents such as the
Housing Register and Local Housing Needs Surveys ensuring that the needs of the District are met through provisions in the Local Plan. It is useful for the Local Plan to set out the general needs of the district rather than relying solely on market forces. The tenure mix should be strongly influenced by an understanding of local need, including aspirations towards home ownership that can not currently be met due to poor affordability in Waveney. Rent to buy housing has significant capacity to assist households into home ownership by bridging the deposit gap. This not only helps those living in private rented accommodation but also those currently living in other affordable homes which no longer suit their needs.

Wellington Construction commented there is no harm providing that a degree of common sense is applied taking into account changing market conditions.

**Members of the Public**

There was significant support for a policy that requires a mix and type of housing based on assessment of local need. People highlighted the shortcomings of the market-led approach and said that developers will build for maximum profit resulting in executive type houses, the market has not delivered what is needed and is unlikely to meet the needs of lower income households in the future. People stated that:

- The type of housing required should relate to the overall aims of the plan and be specified in the plan;
- New housing sprawl will make the district less attractive and could cause the district to deteriorate;
- We should try to keep young people in the area and not attract more retired couples who are selling their homes in more affluent areas;
- Housing should be affordable for local residents;
- Housing Associations and local self build groups should be given priorities over sites;
- There should be a housing focus on affordable family homes to attract people to the area;
- Housing mix should reflect local need and character of the built and natural environment.

Members of the public identified housing for an older population as an issue and commented that housing should be provided for elderly people including those living alone. High quality housing should be planned for over-65s which would encourage them to move from their current homes freeing up housing for others. Low rise flats with gardens and access to a range of facilities might work well.

There were a number of comments in relation to second homes, especially in Reydon and Southwold. These highlighted the adverse impact the high number of second homes is having on the local communities. One person queried if new homes could be prevented from becoming second homes and another person recommended that Waveney takes an aggressive approach to restricting the purchase of all new housing to local people. Members of the public supported maximising the use of current building stocks and adopting a more imaginative approach to housing such as taxes on empty properties, prevention of the loss of affordable homes and measures to encourage self builders.

There were supporters of a market-led approach with members of the public stating that housing market should dictate what is required and this would allow sustainable finance. Investors will have to be allowed
to decide what types of housing will be profitable otherwise nothing will get built. Attempts to get developers to build social housing and infrastructure have been bypassed.

**How these comments have been taken into account in the First Draft Local Plan**

The majority of respondents supported a policy that requires a mix and type of housing based on assessment of local need. Policy WLP8.1 requires the mix of development to be informed by the Strategic Housing Market Assessment and from consulting the Council, as needs can change from time to time. Policy WLP8.1 also sets out a specific requirement for 35% of new properties to be 1 or 2 bed homes.

A number of developers who responded to the consultation indicated that a market based approach may be preferential. Policy WLP8.1 provides some flexibility to allow for this, but it is considered that some local policy requirements are necessary to ensure local needs are met.

In terms of meeting need for housing for older people, Policy WLP8.1 requires 5% of homes on sites above 20 to meet optional building regulations standards for accessible and adaptable homes. Policy WLP8.2 requires a proportion of affordable housing on a site to be sheltered or extra care housing where practicable. Larger sites allocated in Lowestoft and Beccles require a proportion of homes to be private sheltered or extra care housing. Policy WLP4.1 makes provision for a retirement community in Halesworth.

**Q31 a) How should plots for self build be provided? b) Should self build plots be provided as part of larger housing developments, or as separate sites?**

18 respondents

**Statutory Consultees**

No comments were made in response to this question.

**Parish and Town Councils**

Carlton Colville Town Council stated self build plots should be provided as part of separate sites.

Ilketshall St Margaret Parish Meeting commented that a) plots for self build should be available on the market and b) separate sites.

North Cove Parish Council answered yes to question b.

Southwold Town Council commented that to achieve self build a mechanism is needed whereby land is provided at below market cost. The cost of land is the chief inhibitor. Incorporating self builds within larger commercial developments is a way to dilute the ‘sameness’ of commercially developed estates.
Other Organisations

No responses.

Developers/Landowners

Badger Building commented that self-build is difficult to incorporate into larger housing developments unless sold as serviced plots. Where does this happen there needs to be an element of ‘design coding’ with the plots to ensure some sort of compatibility. Self builders are often trying to build dream houses on very tight budgets and often over extended timescales. This can lead to proposals which are overdevelopment of plots and where construction takes 2-3 years. Such schemes need careful control. They are not convinced that the demand is as large as the government makes out and should not be forced to sell land into this marked as a result of allocation. From a practical point of view self build plots are best suited to sites with an existing road frontage. As such, they are more often found in the more rural areas.

Gladman Developments Ltd commented that evidence identifies there is low demand for self build and those who wish to build their own homes indicated they would like individual plots in the countryside. Gladman would not support a policy that would require all housing developments of a certain size to deliver a percentage of self build housing. This would not reflect the current demand for self build development. Any policies relating to self build development will need to be flexible and take into account viability issues to ensure the deliverability of housing is not compromised. Those who are interested in building their own homes will unlikely wish to live on larger scale sites and may result in self build plots on larger strategic sites failing to be implemented.

Wellington Construction commented there would be more chance of promoting self build if they are part of larger sites but question if there is sufficient demand.

Members of the Public

Several members of the public supported self build on separate sites. Comments included:

- Self build should be encouraged (particularly eco homes) in small numbers and not as part of a wider development;
- Self build should not form part of bigger residential sites due to timeliness and lack or cohesion and good urban design;
- Self build could be located on the outskirts of small villages or market towns beyond the usual physical limits;
- Encourage self build co-operatives for small developments of more than one household;
- If developers are against self build this should be taken in to account as obtaining investment is difficult.

Other people took a different view and commented:

- Self build plots should be provided on both individual sites and on larger developments under local authority planning control;
There should continue to be a mix. There are plenty of developers that have left sites derelict for a considerable time so their concerns about timely completion are not entirely valid.

One person recommended strict design codes should be applied. Another person added that large and insensitive housing estates should be avoided in rural areas and one person was opposed to any self builds.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.3 sets out a positive approach to self-build development. Taking into account the comments above the policy requires self-build schemes of more than five homes to be developed in accordance with a set of design principles.

Some developers suggested the need for self-build is not as high as though and plots should preferably not be sought as part of larger developments. Evidence from the Council’s self-build register indicates a current need for 100 self-build plots. The Housing and Planning Act 2016 places a duty on local planning authorities to grant permission for sufficient development to meet demand evidenced by the register. As such Policy WLP8.3 requires 5% of homes on sites above 100 dwellings to be self build or custom build.

**Q32 Do you think we should continue with the existing policy to require that 35% of new homes are affordable homes for rent or shared ownership? Or should we set a different percentage?**

28 respondents

**Statutory Consultees**

The Broads Authority commented the Broads Authority Local Plan will defer to the district’s policy on affordable housing as is currently the case.

**Parish and Town Councils**

Carlton Colville Town Council commented they do not have the expertise to suggest otherwise.

Ilketshall St Margaret Parish Meeting commented that 35% is ok.

Kessingland Parish Council stated that Affordable Housing is one of the main priorities in Kessingland. In June 2015 a Housing Needs Survey was undertaken by Community Action Suffolk on behalf of the Neighbourhood Planning Team. 89% of those taking part were in favour of an affordable housing scheme and 42 households (totalling 70 people) have a current housing need and 16 households (30 people) have a need to return to Kessingland. In August 2014 the Waveney Housing Register showed 101 people with a local connection to Kessingland by virtue of living or working there or having close family there. The housing register does not give a complete picture but there are considerable needs in Kessingland from
people with a local connection. The Neighbourhood Plan showed nearly 75% of 31-63 year olds were looking to stay in Kessingland but nearly half would not be able to afford the cost of housing. It is considered important that when new development is brought forward in Kessingland which delivers affordable housing these units are where possible offered to people with a local connection to Kessingland. Three sites in Kessingland are expected to deliver 45 affordable units.

Reydon Parish Council commented that they believe the priority for any new housing needs to be the development of smaller or low cost units suited to the needs of younger people/families and older people/couples needing smaller and accessible accommodation. A 35% quota for affordable housing in all new developments should be retained in the Local Plan. However, achieving long-term affordable housing for local people in Southwold and Reydon is very difficult. Around 50% of new housing in this area, including a significant proportion of new affordable housing, in the last 10 years has quickly ended up as second homes or holiday lets. Therefore, building new houses in the locality may frequently fail to meet the needs of the local community.

Southwold Town Council stated 35% should be retained and consideration should be given to increasing the percentage depending on local conditions. For example, in Southwold over 90% of new development is bought by the second home/holiday let/buy to invest market. New development is not satisfying the need for primary residences.

Other Organisations

The Southwold and Reydon Society stated the existing policy of 35% of new homes to be affordable for rent of shared ownership should be continued.

Developers/Landowners

Badger Building commented that any increase in this percentage will see development falter or more viability submissions with planning applications.

Larkfleet Homes suggested the Council should set a policy requirement based on the requirement established through the Strategic Housing Market Assessment. It should be acknowledged the delivery of this target is subject to viability, particularly given the introduction of non-negotiable CIL which limits the scope for other contributions to be negotiated when sites are subject to abnormal costs.

Lawson Planning Partnership commented the current requirement for a minimum of 35% of new dwellings to be affordable is high and is likely to impact on the ability of developers to provide policy compliant affordable housing on many sites. To identify an appropriate target the Council need to prepare the necessary evidence. This should be published as part of the evidence base of the new Local Plan and made available for public consultation. When preparing the evidence, the Council should have regard to the NPPF and the requirement for affordable housing policies to be sufficiently flexible to take account of changing market conditions (para. 50).
Lawson Planning Partnership added that any affordable housing thresholds should be subject to financial viability considerations to ensure all suitable sites can be developed without affordable housing requirements rendering them unviable. Viability considerations should take account of affordable housing tenures and the associated splits that developers are required to provide. Whatever the Council considers to be an appropriate percentage of affordable housing this should be set as a target rather than a minimum requirement. This will allow for viability considerations and prevent restricting development on constrained but otherwise highly sustainable sites. When considering a new policy on affordable housing the Council will need to incorporate the addition to the National Planning Practice Guidance published on 19 May 2016 relating to Vacant Building Credit. The policy has been introduced to incentivise brownfield development and enables a credit to be applied against the floorspace of any vacant buildings on the site which should be used as a relief against affordable housing.

Rentplus commented that they can help meet the needs of households aspiring to home ownership but currently they are locked out of both affordable and market housing, extending the opportunity of home ownership to those otherwise trapped in expensive private rented accommodation or inappropriately housed in social rented housing. This model enables those not currently able to save to rent at an affordable level, whilst living in a Housing Association maintained home to save for the deposit to purchase the home. This helps move households out of private rented accommodation, those living with parents, and also to make the move from social rented housing where this no longer suits their needs. They added that to ensure that the Local Plan is compliant with existing and emerging planning policy it is important that any proposed policies concerning definitions of affordable take into account rent-to-buy affordable housing. Policies should be drafted to ensure developments provide an appropriate mix of housing that suitably responds to both housing needs and aspirations.

Wellington Construction commented that 35% is optimistic given the Government’s Starter Home initiative and suggest the level needs to be reduced and viability taken in to account.

Members of the Public

Members of the public provided a mix of comments. Some were supportive of retaining the 35% policy, some recommended an increase to the percentage, some thought it should be lower and some thought it should vary according to local need. Comments included:

- The percentage should reflect local needs;
- The percentage should reflect local circumstances including land values, house prices, demand and wages;
- Housing Associations should be the one exception to building outside of physical development limits;
- Get developers to build social housing on a separate site nearby and it would probably be best if these were built first;
- The basis should be the number of homes needed to house everyone currently on the housing list. A figure of 70% was suggested;
• The Council should focus more on affordable housing and part-ownership to attract the right type of people from other areas to generate growth;
• Affordable homes in Reydon have been sold on the open market as holiday homes;
• Affordable housing policy seems to push through a development that is not meeting any real need for growth in the area;
• Investors do not want to be involved with affordable housing and the Council should accept this if it wants the private sector to build;
• Affordable housing is a priority but they should not be built on top of each other creating car parking issues;
• Affordable homes should be for purchase and not for rent;
• A higher proportion is needed given "House prices in Waveney are more than 6 times average annual earnings...;"
• The percentage should be increased but this should be determined by local need. To maintain a balanced community future developments should primarily benefit the community and not the developers;
• 35% is too high and is stopping development. Sensible and sustainable figures needed.

How these comments have been taken into account in the First Draft Local Plan
Given the significant need for affordable housing in the District as evidenced by Part 2 of the Strategic Housing Market Assessment, Policy WLP8.2 continues to set a requirement of 35%. This target will be tested through a viability assessment of the Local Plan following consultation on the First Draft Local Plan. The requirement may go up or down dependant on the results of the assessment. The Council may consider a differential target based on areas if supported by evidence.

Q33 What size site should provide affordable housing? Should we continue with the current threshold of 5 homes or set a different threshold?
20 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
Carlton Colville Town Council supported a threshold of 5 homes.

Ilketshall St Margaret Parish Meeting supported a threshold of 5 homes.

Southwold Town Council commented that the current threshold of five homes should be kept. In places like Southwold where there is limited land for development a lower threshold should be permitted. This should not only be done through Neighbourhood Plans which may have been enacted before the new Local Plan is in place.
**Other Organisations**

Southwold and Reydon Society responded “yes”.

**Developers/Landowners**

Badger Building commented that a recent Court of Appeal decision has resolved this in favour of sites over 10.

Benacre Estates Company commented that in accordance with National Planning Practice Guidance affordable housing contributions should not be sought on developments of 10 units or less and have a maximum combined gross floorspace of no more than 1000sqm. The threshold for affordable housing should be increased to 11 homes to comply with national policy.

Lawson Planning Partnership commented that the current threshold for 35% of affordable housing to be provided on schemes of 5 units or more is too low and is restricting to small-scale development. When the Council are preparing their evidence on the appropriate percentage of affordable housing to be provided consideration should be given to the appropriate threshold of dwellings to trigger affordable housing provision. The revision to National Planning Practice Guidance on 19 May 2016 identified small-scale and self build developments of 10 units or less (can be 5 units in rural areas) should be exempt from including affordable housing provided that they have a maximum combined gross floorspace of less than 1000sqm (Ref ID: 23b-031-20160519). As a starting point the threshold should be changed to only require affordable housing to apply to schemes comprising 10 dwellings or more.

Rentplus commented that following the Court of Appeal judgement in the case of CLG v West Berkshire and Reading Councils (2016) the Government’s guidance in the PPG was reinstated; this sets national thresholds below which affordable housing should no longer be required. It is particularly important at this stage of reviewing the Local Plan for the Council to consider whether it has local evidence that justifies a lower threshold (as with the existing adopted Local Plan) at which it will require affordable housing delivery, or whether to simply adopt the national guideline threshold. No matter what the evidence suggests it will remain important for the Council to prioritise delivery of affordable housing in all its forms.

**Members of the Public**

A range of responses were received from members of the public. Some were supportive of the current threshold of five homes and others sought a different threshold. Comments included:

- A higher threshold is desirable;
- The current threshold is too low and puts unreasonable extra costs on market housing;
- Retain the current threshold of 5;
- The current threshold of 5 is in breach of the Government's recent appeal;
- It is important any new developments include some low cost houses;
Affordable homes should be built where they are needed and desired and not as a matter of site size;
A mix of both affordable and private homes is desirable;
Some affordable housing should be provided in villages and market towns but the main focus should be in Lowestoft;
If sites are predominantly under the threshold or site sizes are being manipulated to avoid affordable housing then there is a strong case for reducing the threshold;
Affordable housing should be sympathetically designed.

How these comments have been taken into account in the First Draft Local Plan
Given the national planning policy position of a threshold of above 10 as identified in the consultation responses above, Policy WLP8.2 sets a threshold of sites of 11 or more dwellings.

Affordable Housing

Some general comments around affordable housing were received from members of the public and included:
- There is a gap between supply and demand and the solution lies with 1930’s style national investment in social housing;
- Affordable housing should mean starter homes which are affordable and not social housing;
- Current policy does not address the current lack of affordable housing. This should be addressed by building a greater number of smaller properties to reduce the demand and hence the rents achieved. There should also be more schemes to prioritise properties for local buyers rather than investors;
- Affordable housing usually means low standard homes. Property ownership should be encouraged for individuals and not landlords.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.2 requires 50% of new affordable housing to be starter homes or shared ownership. The policy also requires affordable homes to be of a design standard which makes them indistinguishable from the market housing on the site.

Q34 Should 'Starter Homes' be part of the overall affordable housing requirement? Or should starter homes be an additional requirement above affordable housing provision?
22 respondents

Statutory Consultees

No comments were made in response to this question.
**Parish and Town Councils**

Carlton Colville Town Council commented that starter homes should be in addition to affordable housing.

Ilketshall St Margaret Parish Meeting commented that starter homes should be part of the overall affordable housing provision.

North Cove Parish Council commented that starter homes should be part of the affordable housing requirement.

Southwold Town Council commented that they are strongly of the view that Local Authorities should not be required to build starter homes in place of other types of social housing. Local communities, community land trusts and housing associations should be able to determine what type of affordable housing is needed locally.

**Other Organisations**

Southwold and Reydon Society commented that starter homes should be an additional requirement to the 35% affordable housing requirement.

**Developers/Landowners**

Badger Building commented that it is likely that forthcoming changes to the National Planning Policy Framework will make this the case when the definition of affordable housing is amended. The Act and the technical guidance are likely to make it clear that Starter Homes have priority over other forms of affordable housing.

Larkfleet Homes commented that it is apparent from the Department of Communities and Local Government’s ongoing ‘Starter Homes Regulations’ technical consultation that it is the Government’s intention for starter homes to be considered a new type of affordable housing provision. They noted they would support this view on the basis that starter homes present an attractive form of affordable home ownership which can be readily and more viably delivered than other affordable housing products. Affordability is a significant constraint to home ownership in the area. During their public exhibition the possibility of providing starter homes to enable local people to own their own home was well-received. The provision of starter homes, which Larkfleet’s development (site 82) would propose to deliver, forms a significant element is considered highly desirable. This should not be supplanted by other affordable housing products.

Lawson Planning Partnership commented that when deciding upon an appropriate affordable housing requirement it is essential for the Council to give consideration to the inclusion of Starter Homes. Should the Council decide to include Starter Homes as part of the overall affordable housing requirement it is important the affordable housing threshold is not increased to account for these. This would render
developments unviable. Starter Homes should form part of the mix of the identified affordable housing requirement.

If the Council decide that Starter Homes should be provided in addition to affordable housing and not as part of the affordable housing mix then the affordable housing threshold should be reduced to ensure developments remain viable.

The preferred approach is for Starter Homes to comprise a proportion of the overall affordable housing requirement. Evidence on the requirement for Starter Homes should be prepared by the Council and should be subject to consultation as part of the Local Plan process.

Rentplus commented the Housing and Planning Act 2016 allows for a tapering of the discount that may be received upon sale of a Starter Home. The Regulations are expected to be produced this summer when there will be greater certainty for the Council in developing its policy. For the Local Plan to be in line with existing policy it needs to explicitly recognise the introduction of Starter Homes as part of the overall affordable housing requirement. Rent to buy affordable housing should be recognised. It was recommended to include wording that would indicate the adoption of a flexible approach to tenure mix that responds to local circumstances.

**Members of the Public**

Members of the public commented in favour of having starter homes both as part of the overall affordable housing requirement and with starter homes being in addition to provision affordable housing. Comments received included:

- Starter homes should be an additional requirement to affordable housing requirements;
- Starter homes should be part of the overall affordable housing requirement;
- The percentage of affordable housing should be set according to local needs and not prescribed at district level;
- If smaller starter homes are built at a genuinely affordable value there is a case for including these within the affordable housing provision;
- Greater focus should be on Social Housing first and then affordable housing second;
- Starter homes are important and should be mixed with other types of housing with adequate parking facilities;
- Starter homes should be part of any housing requirement scheme provided quality of build and longevity of structure is maintained;
- Starter homes should replace properties for rent wherever possible.

**How these comments have been taken into account in the First Draft Local Plan**

There was a mixed response to this question. In line with emerging national guidance, Policy WLP8.2 includes starter homes as part of the affordable housing requirement.
Q35 Should some sites be allocated specifically for starter homes?

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council commented that starter homes should be integrated.

Ilketshall St Margaret Parish Meeting were not in favour.

Southwold Town Council commented that starter homes should be discouraged in areas where they are likely to be sold off to become second homes or holiday lets.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building commented that this is a possibility but on a small scale and not on sites of more than 10 as this creates a very unbalanced community.

Rentplus commented that the Housing and Planning Act 2016 allows for a tapering of the discount that may be received upon sale of a Starter Home. The Regulations are expected to be produced this summer when there will be greater certainty for the Council in developing its policy. For the Local Plan to be in line with existing policy it needs to explicitly recognise the introduction of Starter Homes as part of the overall affordable housing requirement. Rent to buy affordable housing should be recognised. It was recommended to include wording indicating the adoption of a flexible approach to tenure mix that responds to local circumstances.

Wellington Construction Ltd were not in favour.

Members of the Public

One person was in favour of allocating sites specifically for starter homes and seven were opposed. One person commented that starter homes should be exempt from the Community Infrastructure Levy.

How these comments have been taken into account in the First Draft Local Plan

No sites have been allocated for just starter homes in the First Draft Local Plan.
Q36 Do you think that the current criteria based policy should continue to be used to determine planning applications for new gypsy and traveller sites or should we allocate sites for gypsy and traveller sites taking account of the criteria in the current?

16 respondents

Statutory Consultees

The Environment Agency commented that it is important to consider flood risk for these sites and to apply the sequential and exception tests. The Local Plan is a good opportunity to encourage these sites to register with our Flood Warning Direct (FWD) service and encourage them to have flood plans where they are at risk. A policy on waste water disposal would also be beneficial to prevent harm to the environment.

The Greater Norwich Local Plan Team commented that Gypsies and Traveller’s needs will be assessed through the Greater Norwich Local Plan and Greater Norwich officers think there could be some benefits in having a meeting to discuss the matter with Waveney officers to ensure any wider strategic issues (any potential new transit site, for example) are considered. The greater certainty of meeting the identified need for additional gypsy and traveller pitches through a specific allocation probably militates slightly in favour of this approach rather than relying solely on the criteria-based policy.

Parish and Town Councils

Carlton Colville Town Council recommended using planning policies rather than site allocations.

Ilketshall St Margaret Parish Meeting commented that current policy criteria are appropriate.

Southwold Town Council supported the continuation of existing criteria which gives appropriate flexibility.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building responded “yes”.

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Members of the Public

A variety of responses were received. The greatest support was given to continuation of the current policy (4 responses). Two people supported the allocation of sites in the Local Plan, two people thought no sites should be provided and one person commented that sites should not be allocated in advance.

**How these comments have been taken into account in the First Draft Local Plan**

There was a clear preference for the continuation of a criteria based policy and respondents agreed the existing approach seemed to work. Policy WLP8.5 continues the criteria based policy approach and in line with advice from the Environment Agency specifically requires water and sewerage connections and prohibits development within flood zones 2 and 3.

**Q37 Do you think we should continue to identify areas where the conversion of properties to flats will be controlled by planning policy?**

15 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

North Cove Parish Council supported continuing with the policy.

Southwold Town Council identified an incentive to convert larger older properties into flats for use as holiday lets rather than low cost housing. Southwold residents identified detrimental impacts from parking, noise and disturbance. They urged the concept of flat saturation to be applied to conversions of larger homes in to holiday lets and future Local Plan consultations should be invited to identify ‘holiday let’ saturation areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building supported continuing with the policy.
Members of the Public

Eight members of the public supported the continuation of the policy and three were against. One person commented that conversion of flats helps meet a housing need.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.4 continues the existing approach of identifying areas where the conversion of properties to flats will be controlled.

Q38 What areas should be identified as 'Flat Saturation Area' where further flat conversions will be controlled?
3 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
North Cove Parish Council identified Lowestoft town centre, Marine Parade and London Road South areas.

Other Organisations
No comments were made in response to this question.

Developers/Landowners
No comments were made in response to this question.

Members of the Public

One member of the public commented that anywhere the housing stock is densely packed and/or where parking and services might come under pressure should be considered. Another member of the public was not in favour of any areas and stated each case should be decided on its merits.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.4 identifies flat saturation areas on Lyndhurst Road, Denmark Road, London Road South, Kirkley Cliff Road, Grosvenor Road, Cleveland Road and Windsor Road.
Q39 What criteria should we use to determine planning applications for conversion of properties to flats?
5 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
No comments were made in response to this question.

Other Organisations
No comments were made in response to this question.

Developers/Landowners
No comments were made in response to this question.

Members of the Public

The following criteria were identified by members of the public:

- Size and suitability of property;
- Environment;
- Availability of vehicle and cycle parking;
- Noise impacts;
- Flood risk;
- Local need;
- Availability of low cost or affordable housing or starter homes.

One person felt no more flat conversions should be allowed.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.4 includes many of the criteria points identified above.

Q40 Should we allow market housing on rural affordable housing exception sites?
14 respondents
Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting and North Cove Parish Council opposed this idea.

Southwold Town Council were supportive but only if the ratio of affordable to market housing is 50% or more, the primary purpose of providing market housing is to cross-subsidise the affordable homes and the market homes will be used for full time residents.

Other Organisations

Southwold and Reydon Society were not in favour.

Developers/Landowners

Badger Building commented this should be allowed if it can be used as a way of cross funding local housing needs.

Rentplus commented the NPPF allows for the direct cross-subsidy of affordable housing delivery on rural exception sites. The Council should ensure its policy on these sites allows for this where a site has viability constraints. The Council should permit the delivery of affordable housing wherever this will meet local affordable housing need and is within a sustainable location. Restricting the delivery of any tenure of affordable housing is unhelpful to those seeking to meet local needs.

Wellington Construction commented this is a sensible strategy to facilitate affordable housing.

Members of the Public

Members of the public were largely opposed to this idea. One person said they would support this idea if the market housing was starter homes and another person commented this should only happen where infrastructure is present, especially public transport.

How these comments have been taken into account in the First Draft Local Plan

Although there was some opposition to this approach, no reasons were given why. Given the support in national planning policy for the approach and the potential ability to deliver more affordable housing, given the significant need, Policy WLP8.6 allows for this providing that the market housing element is subsidiary.
Q41 Should we only allow rural affordable housing exception sites next to villages with good accessibility to services and facilities?

13 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting supported this idea.

Kessingland Parish Council highlighted the local need for affordable housing and local issues with infill development in Kessingland. The draft Kessingland Neighbourhood Plan has policies to deal with these issues.

Southwold Town Council supported this idea.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building said ideally yes.

Wellington Construction opposed the idea and commented that advances in technology in motor car fuel consumption and energy efficiency means that reliance on motor vehicles will become less problematic in the future. The Local Planning Authority could become pro active rather than reactive when considering development sites in areas where a range of facilities may be spread over several villages or where there is a need to travel to towns for such facilities.

Members of the Public

Members of the public were all in support of this idea.

How these comments have been taken into account in the First Draft Local Plan

There was only limited response to this question and no reasons were given in support of requiring rural affordable housing exception sites to be in villages with good accessibility to services and facilities. Given that there could be a need in smaller villages without good accessibility to services and facilities, Policy WLP8.6 does not require rural affordable housing exception sites to be in villages with good accessibility to services and facilities.
Q42 a) Should we continue to allow small scale development within gaps in the built up frontages in the rural areas? b) If so should this type of development only be allowed where there is access to public transport or local services and facilities?

13 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting supported both ideas.

North Cove Parish Council commented that villages are being ruined by infill of large houses in small gardens without regard for the street scene. Public transport is rarely used and it means more car use.

Southwold Town Council commented that infill in the built-up frontages of villages should be permitted subject to sympathetic design that takes advantage of opportunities to improve the character of the area and providing there is access to public transport, local services and facilities.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building was supportive but commented that the policy needs to be applied more consistently.

Wellington Construction were supportive of both ideas.

Members of the Public

Members of the public unanimously supported the notion to allow small scale development within gaps in built up frontages in rural areas. Responses to the second part of the question were more divided. There were fairly even numbers supporting and opposing restricting such development unless there is access to public transport or local services and facilities. Respondents commented there was flexibility needed and housing development can help to support facilities such as shops, pubs and buses.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.7 provides a flexible approach to allow small scale development in the countryside. It also allows larger schemes of up to five homes to progress where there is local support.

Q43 a) Should we set out detailed criteria for establishing whether a new agricultural workers dwellings is needed? b) If so what should this criteria include?

9 respondents

Statutory Consultees

The Broads Authority intends to bring in some parts of PPS7 into policy as there are some improvements to their current policy DP26. They provided a link to a draft topic paper.

Parish and Town Councils

Barnby Parish Council recognised the value or re-purposing buildings that have become redundant due to changes in farming methods or type but examples are occurring of applications for conversion to holiday lets of buildings which have never been used for their permitted agricultural purpose. The Parish Council requested the conversion of redundant buildings be limited to those that have actually been used for the purpose for some time.

Ilketshall St Margaret Parish Meeting supported setting out detailed criteria for this matter. They suggested that evidence of an ongoing (not just seasonal) requirement should be included.

Other Organisations

No responses.

Developers/Landowners

Badger Building supported the idea but said there needs to be a proper assessment of need and viability of the enterprise first and perhaps a requirement to have lived on the site in temporary accommodation for at least three years before an application will be considered.

Members of the Public

Responses from the public were mixed. Two people supported the use of detailed criteria. Suggested criteria included:

- The land should be in freehold ownership;
- Whether the worker is needed on the site full time;
- Security needs should not be sufficient on its own to justify a dwelling;
There should be evidence of three years profitable operation;
New businesses should have mobile home accommodation until profitability has been demonstrated;
Factor in a living wage for those working in the business when assessing profitability.

Three people opposed the use of detailed criteria. One member of the public suggested the Council should be sympathetic to low impact or ‘one planet development’ principles as is the case in Wales. Such operations should be:

- Hyper-local;
- Aim to support, develop or sustain a resilient local economy;
- Engage in organic/low carbon horticultural/agricultural production or forestry;
- Sustainable in their methods;
- Promote biodiversity;
- Support traditional rural skills;
- Aiming to provide full or part time employment for local people.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.8 takes into account the comments above and establishes a criteria based approach to assessing these types of developments. The criteria is largely based on the former PP7 as mentioned by the Broads Authority.

Q44 a) Should we continue to restricts the size of extensions to dwellings and the size of replacement dwellings in the countryside? b) If not are there any other approaches which could conserve the stock of smaller properties in the countryside?
14 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
Ilketshall St Margaret Parish Meeting and Oulton Parish Council supported the continuation of use of restrictions.

Other Organisations
No comments were made in response to this question.
Developers/Landowners

Badger Building opposed the use of restrictions. The stock of smaller dwellings in the countryside is already unaffordable for local needs so the policy serves no useful purpose.

Wellington Construction Ltd were not supportive of a restrictive policy and commented that design or amenity grounds should provide sufficient control. A flexible approach to rural housing should be employed and smaller starter homes encouraged.

Members of the Public

Six people supported the continuation of restrictions to the size of extensions and replacement dwellings in the countryside. Concerns were raised that extended homes could become second homes or holiday homes which can deprive single people or smaller families of an affordable home.

There was also opposition from three people to continuing the use of this type of policy. One person commented that in the light of the recent Blundeston appeal only homes which are affordable in the first place should be included in the policy. However, they also suggested that where new smaller homes are created these should be subject to the restrictive policy so the stock of smaller cheaper homes are not gentrified. Another person commented that small scale starter style homes should be allowed.

How these comments have been taken into account in the First Draft Local Plan

Given the recent changes to permitted development rights which allow large extensions to properties, it is not considered that the existing approach of restricting the size of extensions to dwellings and the size of replacement dwellings in the countryside is appropriate or effective.

Employment

Q45 Should we continue to identify 'Existing Employment Areas' and protect premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use? (19 respondents) Q46 If we continue to identify 'Existing Employment Areas', which areas should be identified? (6 respondents) Q47 If we continue to identify 'Existing Employment Areas' should we also continue to allow uses such as car showrooms, tyre and exhaust centres and building material stores to be located on the main road frontages of existing employment areas. (7 respondents) Q48 Should the protection of existing employment premises be in a Strategic Policy, requiring proposals in Neighbourhood Plans to be in conformity with the policy? (11 respondents)
Statutory Consultees

The Environment Agency noted that prior approval of light industrial units to flats through change of use means that the development would not have to go through the sequential test process for flood risk and the Environment Agency would not be able to provide comments. They advised that the Council may wish to consider this to strengthen the case to retain employment areas and potentially include policy to prevent residential conversions in areas of high flood risk.

The Greater Norwich Local Plan Team stated that existing and allocated employment areas should continue to be protected, and such a policy of protection should be a strategic policy, that Neighbourhood Plans would have to be in conformity with. The Greater Norwich Local Plan Team stated that existing and allocated employment areas should continue to be protected, and such a policy of protection should be a strategic policy, that Neighbourhood Plans would have to be in conformity with.

Norfolk County Council supported the identification of ‘Existing Employment Areas’. Norfolk County Council stated that those identified in the current plan should continue to be protected unless circumstances have changed. Norfolk County Council suggested a flexible approach should be taken with respect to question 47. Norfolk County Council stated that the protection should be in a strategic policy.

Parish and Town Councils

Carlton Colville Town Council stated that the protection should be in a strategic policy.

Ilketshall St Margaret Parish Meeting supported the identification of ‘Existing Employment Areas’. Ilketshall St Margaret Parish Meeting stated that at least the current list of sites should be protected. Ilketshall St Margaret Parish Meeting stated the Local Plan should continue to allow uses such as car showrooms, tyre and exhaust centres and building material stores to be located on the main road frontages of existing employment areas. Ilketshall St Margaret Parish Meeting stated that the protection should be in a strategic policy.

Kessingland Parish Council noted that they are not included in “Existing Employment Areas” as defined in the current Waveney Local Plan. The Parish Council highlighted policies in their Neighbourhood Plan which will protect and provide for employment uses.

North Cove Parish Council stated that housing on employment sites will just lead to more unemployment ghettos.

Southwold Town Council supported the identification of ‘Existing Employment Areas’. They stated a need the industrial/warehouse/workshop area off St Edmunds Road should be designated and protected. They stated their desire to encourage more knowledge based industries and diversify the town’s economy. They advised the Council to look at the Fortune Green and West Hampstead Neighbourhood Plan in London and encourage Business Innovation Centres in Market Towns. They stated that the Local Plan economic policies should be flexible enough to enable Neighbourhood Plans to develop specific sites and policies that
promote knowledge based businesses and other economic development outcomes identified by local communities.

**Other Organisations**

The Beccles Society stated that the Enterprise Zone should be continued in order to maintain wealth creation companies.

The Lowestoft and Waveney Chamber of Commerce stated that they understood there was currently a significant over allocation of employment land in the District which is not helpful to overall development. They stated they would therefore support a reduction in the allocation of employment land and at the same time urge the Council to be mindful of the new opportunities that will arise in both north and south Lowestoft following the opening of the new crossing over Lake Lothing.

**Developers/Landowners**

Badger Building stated that a flexible and pragmatic approach is needed. They raised concern about protecting outdated employment uses and referred to the latest permitted development rights which allow conversion of some employment spaces to housing which undermine blanket protection policies. They suggested policies should be more criteria based and less absolute.

BKW Ltd supported a 9 hectare site adjacent to Ellough Airfield to be considered as an ‘Existing Employment Area’. They suggested the existing allocation of BEC1 should be unallocated as it has not already been developed. They advised that Paragraph 22 of the National Planning Policy Framework which states the long term protection of employment sites should be avoided.

St John’s Hall Farms agreed that the Local Plan should still identify employment areas for employment use for a period of time (3 years) but include provisions for alternative uses should employment uses not be delivered with the timescales. St John’s Hall Farms suggested the Council should allow car showrooms to be located on road frontages of employment land.

**Members of the Public**

Most members of the public supported the identification of ‘Existing Employment Areas’. One respondent went on to state that there needs to be greater effort in unlocking employment sites and bringing them forward with more proactive marketing and incentives to encourage businesses to relocate and expand. They also suggested investment in broadband and incubator/start up units. One respondent suggested that conversions should be considered on a case by case basis if there is no demand for commercial use.

Two members of the public responded to question 46. One suggested land around Lowestoft quay and Lake Lothing should be identified and the other said sites with suitable infrastructure, public transport, adequate roads, cycle access, power, etc.
Four members of the public supported the existing approach as detailed in question 47. Two respondents opposed the approach. One respondent suggested it should depend on the type of employment area as the uses described would not be so compatible with a higher quality business park. One respondent stated that at present there is an unusual concentration of car dealerships on central sites in the town (Halesworth) which cover large areas with stationary vehicles to no general benefit. They stated that businesses should be encouraged to relocate to employment areas to the north of the town.

Three members of the public responded to question 48 who all agreed protection should be in a strategic policy.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.12 continues to identify and protect employment premises within Existing Employment Areas. The Policy provides a flexible approach and will allow for change of use to a compatible use if marketing evidence demonstrates there is no demand for the unit in employment use. It is not considered appropriate to identify industrial/warehouse/workshop area off St Edmunds Road as an Existing Employment Area. The site has a low proportion of existing premises within employment use and a high vacancy rate. The site suggested by BKW Ltd is also not appropriate as the site is currently undeveloped.

In line with the general support above, the policy continues to allow uses such as cars showrooms and trade counters on the main road frontages of Existing Employment Areas.

All policies in the Local Plan are considered to be strategic policies.

**Q49 Should we allocate more than enough land to meet needs to enable more choice in the market and give flexibility to deal with changing circumstances. Or, should the Council allocate only enough land to meet needs, but apply a flexible approach, where new development is supported outside allocated areas if additional need is proven?**

17 respondents

**Statutory Consultees**

Greater Norwich Local Plan Team recommended allocating sufficient land and having a flexible approach to other schemes coming forward. They identified a danger of over allocating which could lead to pressure to convert some of this to residential land if it did not come forward within a few years.

Norfolk County Council stated that allocating more than enough land to meet needs would seem to enable more choice in the market and give flexibility to deal with changing circumstances, particularly if the Oil and Gas industry recovers.
Parish and Town Councils

Carlton Colville Town Council stated the Council should allocate only enough land to meet needs, but apply a flexible approach, where new development is supported, outside allocated areas, if additional need is proven.

Ilketshall St Margaret Parish Meeting stated the Council should allocate enough land with a flexible approach.

Reydon Parish Council stated that they believe more consideration should be given to higher value employment such as IT and design. They stated that this would not require major encroachment into the countryside but small-scale development/re-use, such as completing Reydon Business Park, re-designating Southwold Hospital or establishing mixed use of sites such as that of the former temporary Reydon Pharmacy.

Southwold Town Council stated allocating land for business should be flexible. They noted a need to accommodate businesses and employees relocating from London and advised the need for shared office space (co-working) closer to the town centre.

Other Organisations

Southwold & District Chamber of Trade & Commerce stated that whilst tourism should continue to be developed and promoted diversification should also be encouraged. They stated that consideration should be given to promoting small scale service based business. They stated opportunities to develop small, flexible, service based premises should therefore be encouraged. They reference a recent report by Centre for Entrepreneurs – “From ebb to flow: how entrepreneurs can turn the tide for seaside towns”.

Developers/Landowners

Badger Building stated that the Local Plan should allocate sufficient and be flexible around the edges as required. They noted that not every employment use will or can go to a dedicated industrial park.

BKW Ltd. stated that the local planning authority will need to be cautious of the long term protection of employment land if more employment land is allocated than needed. However, they stated this will need to be balanced with the economic benefits that are anticipated through the opening of the Beccles relief road which should not be stifled. They suggested their site at Ellough should be allocated as it is capable of being developed, is already partly developed and has less risk of converting to residential use due to its proximity to the anaerobic digester.

Wellington Construction supported a flexible approach.
Members of the Public

All members of the public who responded supported allocating enough land to meet needs and a flexible approach, where new development is supported outside allocated areas if additional need is proven.

How these comments have been taken into account in the First Draft Local Plan

In line with the comments above the First Draft Local Plan takes a flexible approach. The plan allocates slightly more employment land than what is required and Policy WLP8.13 also allows a flexible approach to allow new employment development outside of allocated sites where a need can be demonstrated.

Q50 In order to address viability issues, should we allocate sites for mixed-use housing and employment developments where the housing development subsidises the delivery of employment land?

15 respondents

Statutory Consultees

The Greater Norwich Local Plan Team stated that cross-subsidising employment land with some market housing is supported but added the need for safeguards to ensure that the employment land actually comes forward at the same time as the housing element.

Norfolk County Council supported the option of using housing to cross-subsidise employment sites.

Parish and Town Councils

Carlton Colville Town Council stated that housing should not be used to cross-subsidise employment sites.

Ilketshall St Margaret Parish Meeting supported the option of using housing to cross-subsidise employment sites.

Other Organisations

The Southwold and Reydon Society stated that more consideration should be given in the Local Plan to the promotion of higher value employment locally, such as IT/design, in order to extend the range of employment available locally and strengthen the balance and sustainability of the community. They added this would reduce the need for encroachment into the countryside. They stated that in general they prefer mixed uses with small-scale business units developed alongside housing.

Developers/Landowners
Badger Building stated that they had looked into the viability of this as part of looking at the proposals for a former nurseries site in Kessingland in the Kessingland Neighbourhood Plan. They stated that unless there is a lot of space to keep the uses separate then there are compatibility problems. They added that presently the difference between capital value and construction cost on small units is such that they are very difficult to fund.

Wellington Construction supported the option of using housing to cross-subsidise employment sites.

**Members of the Public**

Four members of the public supported the use of housing to cross-subsidise employment land. Three members of the public did not support the approach. Concern was raised about possible conflicts between employers and residents.

**How these comments have been taken into account in the First Draft Local Plan**

Two allocations, Policy WLP2.12 and Policy WLP3.1 allocate mixed-use housing and employment developments where the housing will help cross-subsidise the employment use. To address concerns raised above, these sites are large sites which will enable suitable landscaping buffers to be put in place between housing and heavier industry. The outline masterplan for WLP3.1 shows an green buffer between the employment area and housing.

**Tourism**

**Q51 Should we continue to restrict the development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast or should it take a more flexible approach based on impact on the landscape?**

20 respondents

**Statutory Consultees**

No comments were made in response to this question.

**Parish and Town Councils**

Carlton Colville Town Council stated that the plan should take a more flexible approach based on impact on the landscape. They raised concern that housing development can also impact on the landscape and should be restricted in areas bordering the Area of Outstanding Natural Beauty. They added that any
increase of housing along Beccles Road in Carlton Colville would impinge on the Carlton Marshes and on the viability of wild life due to increased recreational pressure.

Corton Parish Council stated that development should be restricted otherwise the whole area will be built on and there will be nothing of interest left for tourists to visit.

Ilketshall St Margaret Parish Meeting stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted.

North Cove Parish Council stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted.

Southwold Town Council stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue to be restricted. They added that further tourist development in Southwold should not be permitted as it is not sustainable.

Other Organisations

Southwold and Reydon Society stated that development of new tourist accommodation in the Area of Outstanding Natural Beauty should continue to be restricted.

Developers/Landowners

Bourne Leisure stated that policies for the natural environment should include reference to balance, and the consideration of the social and economic benefits potentially arising from tourism developments. They added that recognition should be given to the scope for appropriate tourism development, including the expansion of existing holiday accommodation, in areas within or adjacent to sensitive landscape sites and designated nature conservation sites, provided that mitigation measures, such as the inclusion of a buffer zone and appropriate landscaping, can be implemented in order to minimise both direct and indirect impacts.

The Caravan Club Limited supported the existing approach that development of new tourist accommodation in the Area of Outstanding Natural Beauty should continue to be restricted. However, they stated that the diversification of existing sites into new forms of tourist accommodation should be supported.

Wellington Construction suggested that there should be a more flexible approach to benefit the local economy.

Members of the Public

The majority of members of the public who responded to this question thought that development of new tourist accommodation in the Area of Outstanding Natural Beauty and the Heritage Coast should continue
to be restricted. It was noted that the natural environment including the Area of Outstanding Natural Beauty and the Heritage Coast was a valuable asset and one of the reasons tourists visited the area. It was suggested that conversion of existing buildings to tourist use would limit the impact on the countryside.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.15 does not specifically restrict new tourism development in the Area of Outstanding Natural Beauty or the Heritage Coast. However, national planning policy gives a high level of protection to the Area of Outstanding Natural Beauty and the Heritage Coast, and it is not considered necessary to repeat this in the Local Plan. Therefore, the scope for development in these areas is still limited. However, the new approach will allow for small-scale tourist developments where there is no or limited impact on the landscape. Policy WLP8.33 gives some protection to all landscape character areas.

Q52 Should we continue to focus new tourist development in or close to Lowestoft, the Market Towns and Corton and Kessingland or should we take a more flexible approach?

16 respondents

Statutory Consultees

The Environment Agency stated that there are a number of links that can be made between the benefits that a good environment can bring to the area and tourism. They added they would work with the Council to encourage environmental enhancements which could promote tourism.

The Greater Norwich Local Plans Team stated that having the main focus for new tourism development on the main settlements and the coast is appropriate, but some more flexibility on new tourism accommodation in the Waveney valley could be helpful. They mentioned that Local Tourism Action Groups are being set up along the valley as a single entity for tourism purposes.

Parish and Town Councils

Barnby Parish Council stated that applications for new equine tourist accommodation should be supported by a business case. They added that the area around Barnby is not suitable for equine tourism as there are almost no bridle paths in this area and many footpaths are used as bridle paths to their detriment. They suggested that such related accommodation should be in the form of a log cabin which would be less attractive for full residential use.

Beccles Town Council stated that a new hotel on the site at the junction of the Beccles by pass A146 and George Westwood Way (opposite Morrison’s) would be of enormous benefit to the town and bring a considerable increase in tourism and subsequent revenue.

Carlton Colville Town Council suggested there should be a more flexible approach.
Corton Parish Council stated that the Council should not continue to focus new tourist development on Corton and Kessingland. They stated that Corton is already overcrowded with tourist development, with the whole shoreline taken up by holiday accommodation with only limited access points to the coast for residents of the village.

Ilketshall St Margaret Parish Meeting commented that the current focus should continue.

Kessingland Parish Council stated that tourism is an important part of the economy of Kessingland and a significant number of properties close to the seafront are used for tourist accommodation. They raised concern about the potential loss of these properties to residential uses. They stated that they should be protected as tourist accommodation and if any such change is to occur then it must be demonstrated that the tourist use is no longer viable through a 12 month marketing campaign.

**Other Organisations**

No comments were made in response to this question.

**Developers/Landowners**

No comments were made in response to this question.

**Members of the Public**

Most members of the public stated that a flexible approach is required whilst some stated the existing focus on the Lowestoft and the market towns should continue. One respondent stated there should be an even stronger focus on supporting the market towns which are located more inland, i.e. Halesworth, Bungay and Beccles. They suggested working with neighbouring districts to promote tourism in places such as the Waveney Valley to attract visitors away from the overcrowded coastal areas. It was suggested there should be a greater focus on arts and culture to define a higher quality local tourism product. One respondent suggested that tourism uses should be placed near where people live to reduce the need to travel to work.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.15 allows for a more flexible approach for small and medium scale tourist accommodation developments and supports these developments anywhere in the District. Larger developments of more than 80 units are expected to be in or close to Lowestoft, the market towns and coastal resorts. It is not considered appropriate to restrict new tourist accommodation in Corton and Kessingland given the importance of tourism to the local economy.

To address some of the concerns raised by Barnby Parish Council and Kessingland Parish Council, the policy restrict new tourist accommodation in the form of permanent buildings to areas within settlement boundaries, or on large sites where commercial, recreational or entertainment facilities are provided on-
Q53 Should we continue to protect existing tourist accommodation from conversion and redevelopment to other uses?

12 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Parish Council stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

Ilketshall St Margaret Parish Meeting stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

North Cove Parish Council stated that the Council should continue to protect existing tourist accommodation from conversion and redevelopment to other uses.

Kessingland Parish Council stated that tourism is an important part of the economy of Kessingland and a significant number of properties close to the seafront are used for tourist accommodation. They raised concern about the potential loss of these properties to residential uses. They stated that they should be protected as tourist accommodation and if any such change is to occur then it must be demonstrated that the tourist use is no longer viable through a 12 month marketing campaign.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Bourne Leisure strongly supported the need to protect existing tourist accommodation within Waveney from conversion and redevelopment in order to continue to support the tourism sector within Waveney.

The Caravan Club stated that tourism policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in the demands of tourists, and they wish to ensure that under these policies that the potential diversification of this site would be permitted.
Wellington Construction stated that there shouldn’t be protection of tourist accommodation. They suggested that a flexible policy which allowed for conversion through the demonstration of unviability and lack of market interest.

Members of the Public

The majority of members of the public stated that tourist accommodation should be protected. One respondent suggested there should be a flexible approach.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.17 provides protection to existing tourist accommodation and only allows conversion in exceptional circumstances where marketing evidence demonstrates there is no demand for the exiting tourist use. It is not considered appropriate to have a more flexible approach given the importance of tourism to the local economy. This is particularly important in the countryside, where new isolated dwellings should be resisted.

Q54 How should tourism accommodation be effectively restricted for tourism use and not full time residential use?

8 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St Margaret Parish Meeting suggested that the period of occupancy should be limited.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Bourne Leisure stated that a policy should be introduced to ensure that any planning permission for tourism accommodation such as caravans, chalets or similar is restricted to holiday use only. Where necessary, local plan policy should state that conditions are to be imposed on planning permissions to ensure that tourism accommodation cannot be used for residential purposes.
Members of the Public

One respondent suggested there should be legal agreements or covenants to make it impossible for tourist accommodation to be converted to full-time residential use. One respondent suggested limiting the time a tourist can reside in a property. Another respondent suggested caravan sites should not be static full time use such as that which prevails on the North Denes. Another respondent suggested the Council should enforce planning conditions.

How these comments have been taken into account in the First Draft Local Plan

The supporting text to Policy WLP8.15 states that the Council will use planning obligations or conditions to require units to be vacated for a continuous period of six weeks each year. In order to facilitate year round holiday use, the Council will allow proposal to vacate a proportion of the site at one time and the rest of the site at another time.

Q55 Should we continue to restrict the conversion of residential properties to guest houses and hotels in residential streets where further conversion to flats would also not be permitted, or should a more flexible approach to be used?

11 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council suggested a flexible approach should be applied.

Ilketshall St Margaret Parish Meeting suggested a flexible approach should be applied.

Southwold Town Council suggested the policy should be extended to residences being converted into holiday lets. They noted that in Southwold there has been a stark decline in visitors using bed and breakfast, which have been supplanted by holiday lets.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.
Members of the Public

Members of the public were split as to whether a more flexible approach should be applied. One respondent suggested a more flexible approach could be considered if noise and transport/parking criteria are met.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.16 allows for a slightly more flexible approach than at present which allows for some new hotel development in residential streets where further conversion to flats would also not be permitted providing there is adequate parking and bin storage and that the property is above average size. It is not possible to prevent the conversion of residential properties into holiday lets through planning policy as suggested by Southwold Town Council.

Town, District and Local Centres

Q56 Do you agree with the town centre boundaries for Lowestoft and the Market Towns as shown in Appendix 2?

14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed with the town centre boundaries as shown in appendix 2.

Ilketshall St. Margaret Parish Meeting agreed with the town centre boundaries as shown in appendix 2.

Southwold Town Council stated that the Southwold Town Centre Boundary should include the Adnams Brewery building, including the brewery, engineering workshop, the office, Sole Bay Pub, the sweet shop opposite the pub and the Swan Hotel annex. The town centre boundary should also be used to prevent conversions to residential uses. Southwold Town Centre contains a unique mix of uses, including B1, B2, C1, D1 and D2 and these should be protected. This approach involves attracting knowledge based businesses, which seek town centre locations, to Southwold. Multiple use classes attract visitors, which supports local retailers. The Local Plan should not stop Southwold or any other market town from preparing a neighbourhood plan which encourages a range of different uses which support and complement one another. The Town Council supported the introduction of a 350 metre threshold for impact tests.
Other Organisations

Southwold and District Chamber of Trade and Commerce stated that demand for premises in Southwold has consistently outstripped supply. For this reason the town centre should be expanded to include the following: Red Lion and Nelson pubs; High tide (36 East Street); Arcanthus (Trinity Street); all properties between Adnams Cellar and Kitchen and Fromus vets; John Bennett Architects; Electric Picture Palace; Spring Design; Sole Bay Inn and Number One St. James’s Green. In terms of the mix of shops there need to be more retailers that cater for people’s everyday needs and premises must be made available to support this. Southwold has a high proportion of independent retailers, which is one of the town’s strengths, although the proportion has decreased over time. It was felt that the Retail and Leisure Needs Assessment prepared by Carter Jonas misinterpreted survey data to indicate that a higher percentage of respondents wanted to see more national or multiple retailers in the town – in fact a greater percentage preferred local independent retailers. Furthermore the Southwold Town Plan indicated that a large majority of residents (78%) and second home (87%) owners thought the character of the High Street was very important. The idea of development of an out of town supermarket accompanying new development in Reydon was not supported by local residents and should be opposed. It would have an adverse impact upon Southwold town centre. This should be taken into account when planning new residential developments in Reydon.

The Southwold and Reydon Society stated that the town centre needs to be expanded to include all existing shops and businesses. Southwold’s strength lies in the high proportion of independent shops. The Local Plan should extend the town centre to include all commercial properties and protect them from the extensions and conversions that makes them suitable for occupation by national retailers. Such measures are proposed for the Southwold Neighbourhood Plan and should also appear in the Local Plan. Policies that currently protect Lowestoft town centre could also apply to Southwold, together with measures to protect courtyards and gardens from development.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were generally supportive of retaining the town centre boundaries in their existing form. However one responded stated that the town centre should be expanded to include Waveney Drive and the London Road South and South Beach areas.

How these comments have been taken into account in the First Draft Local Plan

The town centre boundaries identified in the ‘Options’ consultation have been kept the same in the First Draft Plan. The amendments suggested by Southwold Town Council, Southwold and District Chamber of Commerce and Southwold and Reydon are not considered appropriate, extending the town centre by this degree would potentially allow for larger retail units such as supermarkets to be developed some distance from the main High Street which detract from the existing offer and could undermine the vitality and viability of the centre.
Policy WLP8.19 allows Neighbourhood Plans to set their own requirements for the mix and use of units within primary and secondary frontages within the town centre.

**Q57 Should we define primary and secondary shopping frontages within each town centre and prioritise retail uses within primary frontages?**

7 respondents

**Statutory Consultees**

No comments were made in response to this question.

**Parish and Town Councils**

Carlton Colville Town Council agreed that primary and secondary frontages should be defined within town centres.

Ilketshall St. Margaret Parish Meeting stated that primary and secondary frontages should not be defined within town centres.

**Other Organisations**

The Southwold and Reydon Society agreed that primary and secondary shopping frontages should be defined inside two centres and added that town centre locations should be protected from extensions into gardens and courtyards, which will retain smaller units that are of a suitable size for local retailers.

**Developers/Landowners**

No comments were made in response to this question.

**Members of the Public**

Members of the public were supportive of defining primary and secondary shopping frontages. One respondent stated that Peto Square, Commercial Road and a redeveloped Lake Lothing/Waveney Drive should be designated as primary shopping frontages and London Road South should be designated as a secondary shopping frontage. One respondent stated that more information was required.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.19 defines primary and secondary shopping frontages and prioritises retail and restaurant and café uses within primary frontages and other town centre uses within secondary frontages.
Q58 Do you agree with the primary shopping area and primary and secondary shopping frontages shown in appendix 2?
6 respondents

Statutory Consultees
No comments were made in response to this question.

Parish and Town Councils
Carlton Colville Town Council agreed with the primary and secondary shopping frontages and primary shopping area shown in appendix 2.

Ilketshall St. Margaret Parish Meeting suggested that the primary shopping area in Bungay could be extended along Earsham Street.

Other Organisations
No comments were made in response to this question.

Developers/Landowners
No comments were made in response to this question.

Members of the Public
Members of the public supported the primary and secondary shopping frontage and primary shopping area shown in appendix 2. One responded stated that more information was required.

How these comments have been taken into account in the First Draft Local Plan
The primary and secondary frontages identified in the ‘Options’ consultation have been kept the same in the First Draft Plan. The amendments suggested by Ilketshall St. Margaret Parish Meeting are not considered appropriate as there are insufficient retail premises along Earsham Street to justify it being part of the primary shopping area.

Q59 Should town centre boundaries and associated policies be set out in a Strategic Policy requiring proposals in Neighbourhood Plans to be in conformity with the policy?
6 respondents
Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council did not agree that strategic policy should require neighbourhood plans to be in conformity with the policy.

Ilketshall St. Margaret Parish Meeting agreed that strategic policy should require neighbourhood plans to be in conformity with the policy.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

No comments were made in response to this question.

Members of the Public

Members of the public were generally supportive of this policy but one responded stated that it required consultation. Another thought that some form of guidance was necessary and suggested a decision tree which would require neighbourhood plans to justify any deviations in terms of local or wider district retail needs versus leisure or other commercial opportunities.

How these comments have been taken into account in the First Draft Local Plan

All policies in the First Draft Local Plan are Strategic Policies. However, Policy WLP8.19 allows Neighbourhood Plans to set their own requirements for the mix and use of units within primary and secondary frontages within the town centre.

Q60 Should we continue to prioritise retail use in the District centres of Oulton Broad and Kirkley and other local shopping centres or take a more flexible approach?

11 respondents
Statutory Consultees

The Broads Authority stated that it had discussed with Waveney District officers the potential for a common policy and mapping approach for Oulton Broad, which is a shared centre between the two authorities and it looked forward to developing this further.

Parish and Town Councils

Carlton Colville Town Council stated that retail uses should continue to be prioritised in these areas.

Ilketshall St. Margaret Parish Meeting stated that retail uses should continue to be prioritised in these areas.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building stated that a more flexible approach was needed or that properties would remain vacant.

Wellington Construction stated that retail should not continue to be prioritised in the District centres.

Members of the Public

Members of the public supported the continued prioritisation of retail in the District centres. One respondent stated that it was important to understand how alternative uses would avoid impact upon the viability and vitality of the District centres, perhaps through the use of a decision tree. Another stated that greater flexibility was needed because cafes and restaurants would increase footfall in these centres.

How these comments have been taken into account in the First Draft Local Plan

Policies WLP2.10 and 2.11 continue to identify Oulton Broad and Kirkley as District Centres. Policy WLP2.10 for Oulton Broad is consistent with the approach emerging in the Broads Local Plan. The Policies prioritise retail use but also are flexible with respect to cafes and restaurants. This will ensure the centres remain vibrant and vacancies are kept low. Policy WLP8.2 continues to prioritise retail uses. Retail uses are considered more important in smaller local centres to the overall function of the centre.

Q61 Should we require an impact assessment on all retail proposals with a net retail floor space greater than 350 sqm or rely on the national threshold?

12 respondents
Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St. Margaret Parish Meeting stated that 350 sqm was an appropriate threshold for requiring a retail impact assessment.

Developers/Landowners

Badger Building supported the 350sqm threshold but added that any impact assessment should be subject to rigorous review.

Other Organisations

No comments were made in response to this question.

Members of the Public

Members of the public were supportive of the 350sqm threshold to focus development into existing retail areas with one respondent arguing that 350 sqm was too high. One respondent argued that impact assessments should also be broader in scope to include implications for transport, parking, accessibility, supply chain movements, public realm, environment, noise and pollution. One respondent thought the threshold was much too low and would increase the amount of paperwork when submitting a planning application.

How these comments have been taken into account in the First Draft Local Plan

Most respondents supported the threshold, and based on the evidence contained within the Retail and Leisure Needs Assessment, Policy WLP8.18 introduces the 350sqm threshold for an impact assessment. It should be noted that this assessment is only required for proposals on edge of centre and out of centre sites.
Community services and facilities

Q62 Should we continue to protect all existing community services and facilities as far as it is possible to do so? (17 respondents) Q63 Where it is not viable or possible to retain the existing community use should we require an alternative community use to be investigated prior to allowing redevelopment or conversion to residential or commercial use? (13 respondents) Q64 Should some types of services and facilities be given more protection than others? (10 respondents) Q65 Should we only protect services and facilities listed as ‘Assets of Community Value’? (12 respondents)

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Carlton Colville Town Council agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. Carlton Colville Town Council stated that some uses should be given greater protection than others. Carlton Colville Town Council stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Southwold Town Council suggested a broad definition of community facilities to include anything that is of value to the community, used by the community and necessary for the community to function. This could include, sheltered homes, care homes, Post Office, healthcare facilities, banks, pubs, theatres, meeting places, church halls, libraries, etc. The Neighbourhood Plan Focus Group regarded local independent businesses as community facilities because the owners looked after local needs. This might be a way of protecting local businesses. The Local Plan should protect community facilities and investigate alternative uses on a site prior to its conversion to residential use. Business use should be given priority over residential uses in Southwold because there is a shortage of space for knowledge based businesses. As a minimum the Local Plan should not seek to undermine the Neighbourhood Plan which seeks to convert redundant buildings to business uses. Neighbourhood Plan research has revealed that 31 community facilities have been lost to the town and all converted to residential uses. Residential development is suffocating economic development because of the lack of space for the latter. The local community should decide what services and facilities are important to them and this should be acknowledged in the Local Plan. Protection should not be limited to buildings that have been designated as assets of community value.

Ilketshall St. Margaret Parish Meeting agreed that services and facilities should be protected as far as possible. Ilketshall St. Margaret Parish Meeting agreed that alternative community uses should be
investigated prior to redevelopment or conversion to a residential or commercial use. Ilketshall St. Margret Parish Meeting stated that some uses should be given greater protection than others. Ilketshall St. Margaret Parish Meeting stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Oulton Parish Council agreed that services and facilities should be protected as far as possible. Oulton Parish Council agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use.

Kessingland Parish Council stated that it was essential for it to protect its community services and facilities. Shops in Kessingland have come under pressure in recent years due to construction of the bypass and development at South Lowestoft Industrial Estate. Remaining shops need to be protected as part of the community. Kessingland has one primary school which has been granted academy status. It has a roll of 250 pupils and capacity for 300. It is therefore important that the school is retained as part of the community. There is one doctor’s surgery covering Kessingland, Wangford and Wrentham and pressure on it will increase if there is further development. Adequate primary care will become even more important as the population becomes older. East Suffolk Community has identified a need to provide affordable, sustainable and high quality areas across Suffolk and Norfolk. This would include early years care and wrap around care (in the form of after school and holiday clubs). This will provide childcare that enables parents to access employment and will also generate jobs for local people. Kessingland Neighbourhood Plan allocated land at Francis Road for an early years centre plus car parking. It is essential that the early years centre does not impact upon the amenity of local people. The Manor Farm Care Home also contacted the Neighbourhood Plan team stating that it cannot cope with increasing demand for its services in its existing building. The care home has asked if land next to its existing facility could be allocated for development so that it could offer a wider range of services than just dementia and old age care. This could include respite, end of life, assisted living, day care and short term breaks. It is supported by the community.

Other Organisations

The Southwold and Reydon Society agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. The Southwold and Reydon Society stated that planning policies should not only protect services and facilities listed as Assets of Community Value.

Sport England stated that community facilities (including sports pitches and indoor sports facilities) should be protected in order to increase levels of participation in sports and reduce obesity. It is particularly important to protect key sites for sport as identified in the Playing Pitch Strategy and Sports Facilities Strategy. Sport England stated that playing fields require specific protection in line with Sport England’s policy and NPPF paragraph 74.

The Theatres Trust stated that planning policies should recognise the importance of community facilities and cultural infrastructure. Paragraph 70 of the NPPF states that valued cultural facilities should be
protected and that established facilities are retained and are able to develop for the benefit of the community. The following wording is suggested to support and protect cultural and community facilities: **Cultural and community facilities**The Council will resist the loss or change of use of existing community or cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the needs of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.

Policies should also contain criteria for encouraging new facilities in the District to serve the growing population. To ensure clarity and consistency it is recommended that community and cultural facilities area defined in the glossary. A suggested definition is: **community and cultural facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure, and cultural needs of the community.**

The Beccles Society stated that a swimming pool and leisure complex that could be converted into a theatre or meeting room would be useful in addition to the infrastructure in Beccles either now or in the future and could be located in one of the locations put forward for housing just outside the town centre.

**Developers/Landowners**

Wellington Construction stated that protecting community services and facilities was reliant on funding.

Badger Building did not agree that community services and facilities should be protected because the market has changed significantly in the last few years, particularly in regard to public houses, and the planning system has not kept up with this. Use it or lose it is the correct approach. There is a disproportionate focus on pubs within the planning system, probably because of the influence of CAMRA. Other facilities are just as valuable. Badger Building did not agree with investigating alternative community uses prior to residential or commercial conversion or development. Badger Building stated that once a service or facility has closed protecting the site will not preserve the service or facility. If a service is relaunched it will find its own appropriate premises. Badger Building stated that planning policies should only protect services and facilities that are listed as Assets of Community Value.

**Members of the Public**

Members of the public were supportive of protecting community services and facilities. This is unless equally accessible replacements can be provided locally. Waveney District Council has failed to maintain community facilities properly (the example being given was Beccles Public Hall as well as the Lido, the Quay and its moorings, and the meadow). Poor maintenance of sports facilities also means they are not available during their respective sports seasons.

Members of the public agreed that alternative community uses should be investigated prior to redevelopment or conversion to a residential or commercial use. One respondent stated that failure to undertake this would result in the loss of facilities over time, which will not be replaced. Membership of
sports organisations tends to be cyclical and the Council should be aware of this when supporting voluntary organisations that provide sports and leisure services.

Members of the public mostly favoured protecting some uses over others. One responded highlighted services that required greater travelling distances should receive greater protection, as should those where there were no alternative providers, such as public transport. Only one respondent disagreed that some types of facilities should be given more protection than others.

Members of the public disagreed with only protecting assets of community value, with one stating that the Council needed to protect a broader range of facilities and that once lost these are difficult to replace. Respondents stated that all services and facilities that were used by the community should receive protection.

**How these comments have been taken into account in the First Draft Local Plan**

Most respondents supported protecting community services and facilities from redevelopment or change of use to non-community uses. There was no consensus of whether some community services or facilities should receive more protection. Most respondents did not favour assets of community value being the only community service and facilities to protect.

Taking these views into account, Policy WLP8.22 provides broad protection to existing community facilities. It only allows redevelopment where the existing use or alternative community use is not viable and marketing evidence demonstrates there is no demand.

In defining community services and facilities, the supporting text to Policy WL8.22 Ptakes into account comments made by the Theatres Trust. Policy WLP8.23 on Protection of Open Space takes into account comments made by Sport England.

**Climate Change**

**Q66 Are there any areas in the District at risk from flooding where development should be promoted to deliver regeneration?**

11 respondents

**Statutory Consultees**

The Environment Agency stated that any sites put forward in the Local Plan at risk of flooding will need to have the Sequential Test, and if necessary, the Exception Test applied. All sites are best considered as part of an SFRA. Policies should aim to prevent development in the flood plain and new development should be resilient to flooding and improve river environments.
The Environment Agency added that it could be useful to consider a specific flood risk policy that could manage development in flood risk areas. If there is sufficient supply of land in flood zone one this should be acknowledged in the Local Plan and set out any exceptions. A policy setting how planning applications will be determined to ensure they are safe could include details about floor levels, safe access, emergency flood plan, flood resilience and resistance measures, improvements to flood risk in the wider area, increases of built footprint. It was noted an environmental permit for flood risk activities may be required for work related to river and sea defences.

Parish and Town Councils

Carlton Colville noted the Kirkley Stream area is prone to flooding. Regeneration should not be promoted in these areas.

Southwold Town Council stated Millennium Green opposite the Millennium Hall is a flood risk area which should be developed as an environmentally sensitive car park.

Other Organisations

No comments submitted in response to this question.

Developers/Landowners

Badger Building stated that area around Commercial Road and Peto Square would aid regeneration subject to mitigation. They noted that if a flood protection scheme is delivered this will help facilitate delivery of the Brooke Peninsula area.

Wellington Construction Limited noted the Lake Lothing area.

Members of the Public

It was commented that development should not go ahead in flood risk areas. It was also suggested that development could be acceptable if the risk was mitigated and did not put other areas at risk. The Lake Lothing area was identified.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan continues to promote a regeneration strategy in the Lake Lothing area of Lowestoft.
Q67 a) Should we continue to identify a Coastal Change Management Area based on the land predicted to be at risk from erosion over the next 100 years? b) If so should residential development continue to be restricted and other types of development only allowed where they can be proven to be safe for the lifetime of the development and support the local community?

17 respondents

Statutory Consultees

In response to part (a) the Environment Agency stated the 2012 Shoreline Management Plan for Lowestoft to Landguard Point is the agreed way forward for the next 100 years. The National Coastal Erosion Risk Mapping service (NCERM) should be available at the end of 2016 and can be used to update local Coastal Change Management Areas and inform development opportunities and the public. Planning for increased erosion associated with climate change can make communities more resilient, improve biodiversity, water quality and recreation.

In response to part (b) the Environment Agency stated that it is essential to produce risk maps to inform and control development opportunities in areas at risk of erosion in the next 100 years. The current policy of only allowing limited safe development in at risk areas is appropriate.

Natural England expects the Plan to identify a Coastal Change Management Area and set out the type of policies and developments that would be appropriate in it. This should follow guidance set out in National Planning Policy Guidance. The Local Plan should consider the marine environment and apply an Integrated Coastal Zone Management approach and take account of any marine plans in place. The Local Plan should refer to the local Shoreline Management Plan and provide an approach that can respond to changes and help facilitate the relocation of valued environmental assets away from areas of risk.

Parish and Town Councils

Kessingland Parish Council commented a multi-agency group has been set up to monitor the situation at Benac re Pumping Station saying the Environment Agency has described this ‘as one of the most vulnerable parts of the Suffolk coastline’. A coastal study is being undertaken by Halcro to be completed in the summer 2016. They noted that at a multi-agency meeting, everyone agreed the plan should protect Benacre Estate farmland, the Kessingland Levels up to the A12 and beyond, the southern edge of Kessingland village around Coopers Drive, the Anglian Water Sewerage Treatment works, and the commercial businesses like Kessingland Beach Holiday Park and Africa Alive.

Southwold Town Council agreed.

Other Organisations

The Southwold and Reydon Society agreed with both (a) and (b).
Developers/Landowners

Badger Building agreed.

Members of the Public

Nine members of the public agreed to the continued approach and restricting development in these areas. One person suggested no development should be allowed.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan continues the approach of the existing Local Plan and Policy WLP8.25 defines a Coastal Change Management Area based on the area of land likely to be at risk over the next 100 years as identified in the Shoreline Management Plan. The results of the National Coastal Erosion Risk Mapping service are not yet available for Suffolk.

Q68 Should we permit new coastal defence schemes contrary to the approach outlined in the current Shoreline Management Plan or any future Coastal Strategy if wider benefits for the area can be demonstrated?

11 respondents

Statutory Consultees

The Environment Agency stated that in some cases this may be acceptable if the defence design is low key ‘soft’ defence with a limited design life. Hard engineered sea defences should be avoided where there is a potential to negatively impact the sustainability of adjacent coastal frontages citing guidance set out in paragraph 168 of the NPPF. The affordability and future policies for managing, maintaining and improving flood defences should be considered during the preparation of the Local Plan. The SFRA, SMP, Catchment Flood Management Plan and DEFRA’s ‘Flood and Coastal Resilience Partnership Funding - DEFRA policy statement on an outcome-focused, partnership approach to funding flood and coastal erosion risk management’ should be used as an evidence base for the Local Plan and CIL.

Parish and Town Councils

Southwold Town Council stated a tight definition of wider benefits would be required to justify the cost of new coastal defence schemes.

Other Organisations

The Southwold and Reydon Society suggested yes adding that protection measures are needed for the Blyth estuary and Southwold Harbour as identified by the Blyth Estuary group.
Developers/Landowners

Badger Building suggested yes if they sustainable and self funded.

Bourne Leisure stated the Local Plan should include policies to support tourism development within existing site boundaries or for proposals to expand onto adjoining land not affected by coastal erosion. Policies should allow owners and operators to implement and maintain coastal defences. The Shoreline Management Plan states that no active intervention is intended for the coastline in the area but it is important that planning policies recognise the role of existing land uses and their development potential when determining the approach to coastal defences.

Wellington Construction Limited stated yes.

Members of the Public

Five members of the public said yes.

How these comments have been taken into account in the First Draft Local Plan

It is considered that schemes for coastal defences can be best assessed as part of a strategic approach through the review of a shoreline management plan where the cumulative effects along the coastline can be assessed. Considering proposals on a piecemeal basis may undermine a strategic approach to the protection and management of the coastline. Therefore, Policy WLP8.25 continue the existing approach of requiring coastal defence schemes to be in accordance with the Shoreline Management Plan.

Q69 Should we continue to allow for the relocation of residential properties and commercial and community properties at risk from coastal change to areas not at risk?

12 respondents

Statutory Consultees

The Environment Agency suggested this should be determined by the Local Planning Authority citing paragraph 94 of the NPPF ‘you should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations’. It was added there could be wider social, economic and environmental benefits from such relocation.

Parish and Town Councils

Southwold Town Council supported the suggestion.
Other Organisations

The Southwold and Reydon Society supported the suggestion.

Developers/Landowners

Badger Building suggested yes but subject to environmental and landscape considerations.

Members of the Public

Eight members of the public supported the suggestion.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.26 continues the same approach as the existing Local Plan. Policy WLP6.1 also allocates land for residential development including 7 plots for the relocation of properties lost or at risk from erosion at Easton Bavents.

Q70 a) Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan? b) If so which areas of the district would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?

19 respondents

Statutory Consultees

The Broads Authority requested the Broads Landscape Sensitivity Study for Renewables and Infrastructure (2012) be considered when the Local Plan is considered.

Parish and Town Councils

Corton Parish Council suggested that all new builds should have solar panels installed. Wind turbines were not supported.

Ilketshall St Margaret Parish Meeting suggested that sites should be identified but these should be for solar panels where alternative forms of development would adversely affect the community.

Kessingland Parish Council noted the adverse impact the two large turbines have had on the village. They noted measures to minimise water and energy use in new development in the Kessingland area are set out in the Kessingland Neighbourhood Plan.

Southwold Town Council supported to identification of sites and suggested Blyth Road in Southwold could support a small-scale community solar farm.
**Other Organisations**

No comments submitted in response to this question.

**Developers/Landowners**

Badger Building suggested this is best left to the market.

**Members of the Public**

Four members of the public supported the identification of sites. Suggestions included locations that were not subject to landscape designations or of any particular landscape merit, areas that would not affect residents, industrial areas which are often unattractive and the more remote areas would lead to lesser impacts.

It was suggested that solar panels were more suitable than onshore wind turbines. One person suggested onshore turbines should not be permitted and there have been enough solar panels installed.

One person suggested small solar installations were most appropriate while one person suggested only solar panels on roofs should be permitted.

**How these comments have been taken into account in the First Draft Local Plan**

There was limited consensus on this issue and limited suggestions as to where suitable areas might be. As such the First Draft Local Plan does not identify suitable areas for renewable energy development. However, Policy WLP8.27 supports Neighbourhood Plans to identify suitable areas.

**Q71a) How can we encourage new residential developments to reduce their carbon emissions? b) Would a sustainable show home policy as described above be appropriate?**

20 respondents

**Statutory Consultees**

No comments were made in response to this question.

**Parish and Town Councils**

Southwold Town Council stated that in reply to parts a) and b) it was necessary to encourage new build to contain solar panels and SUDs, including rainwater harvesting in larger developments and water buts in
smaller developments. The Local Plan should discourage development that paves over gardens and creates impermeable driveways.

North Cove Parish Council stated that residential development should only be built close to employment areas.

Ilketshall St. Margaret Parish Meeting stated that:
- a) Performance levels should be included in planning approvals.
- b) It was agreed that a sustainable show homes policy would be appropriate.

**Other Organisations**

Southwold and Reydon Society stated that restrictions on renewable energy devices in conservation areas should be reviewed.

**Developers/Landowners**

Badger Building stated that a show home would become out of date too quickly and would not show all of the options available. In this area very few spec built homes are sold off plan and so this approach will have no effect. It is necessary to educate both developers and the public about the options available. Providing a Community Infrastructure Levy discount on energy efficient buildings would help to encourage renewable energy and promoting renewable energy to the public would encourage homebuyers to seek out these products when making purchasing decisions.

Lawson Planning Partnership stated that it was necessary to locate development in sustainable locations (close to shops and services) to encourage sustainable transport.

Wellington Construction argued that it was necessary to offer incentives to promote energy efficiency and to reintroduce food waste recycling.

**Members of the Public**

- a) Members of the public were strongly supportive of reducing carbon emissions in new homes with some arguing that low carbon development should become mandatory. Creating low carbon new development was viewed as important because older Victorian houses were too expensive to convert to low carbon use. Others were more cautious, stating that developers should be incentivised to create low carbon homes. Planning policy should only permit sites and developments that are sustainable. It was acknowledged that carbon development should be balanced against the increased costs to developers and the potential environmental impact of any new equipment that is needed. Homes should be well served by cycle and pedestrian links to discourage car use. Council policy should be flexible to allow for parish and neighbourhood schemes that promote sustainable developments and reduce carbon emissions.
b) Members of the public were supportive of introducing sustainable show homes but it was thought that these would only really be applicable to larger developments. Virtual show homes were suggested as an alternative and it was thought that these could include measures to conserve and enhance wildlife habitat, such as swift bricks and bat boxes.

How these comments have been taken into account in the First Draft Local Plan

The Council has considered the comments above in the formulation of Policy WLP8.28 which encourages sustainable construction through a variety of means, including a sustainable show home. The policy requires a sustainability statement to be submitted with major residential and commercial schemes. Based on evidence from the Water Cycle Study (2017), a water efficiency target of 110 litres/person/day is required for all new residential properties. The suggestion for a community infrastructure levy discount for energy efficient dwellings is not possible under existing regulations.

Q72 Should we still require new school and office development to meet higher standards of energy efficiency?

17 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council agreed that the Council should still require new school and office developments to meet higher standards of energy efficiency.

Ilketshall St. Margaret Parish Meeting agreed that the Council should still require new school and office developments to meet higher standards of energy efficiency.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Badger Building agreed that the Council should still require higher standards energy efficiency in new school and office development subject to viability.

Wellington Construction stated that higher standards of energy efficiency should be fundamental to new school and office development.
Members of the Public

Members of the public were supportive of requiring higher standards of energy efficiency in new school and office buildings. However there was concern that these higher standards should not cause sick building syndrome or reduce cost effectiveness.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.28 continues the requirement for new school and office development to meet higher standards of energy efficiency.

Design

Q73 What makes a well designed development? Can you give any examples of new developments which you think are well designed? (12 respondents) Q74 How can we improve design quality through planning policy? (8 respondents) Q75 Should we provide detailed design guidance in the Local Plan applicable to all sites or should detailed design guidance be prepared just for larger sites specifically identified in the Local Plan? (16 respondents) Q76 Should Building for Life 12 be used as a tool to improve the quality of new development? (11 respondents)

Statutory Consultees

No comments were made in response to these questions.

Parish and Town Councils

Southwold Town Council stated that good design responds to and is in keeping with the character of the landscape. There should be careful attention to detailing and the use of materials that soften with age. Visual balance and simplicity are very important in creating harmony. Pastiche buildings do not work because of the use of modern materials. Careful attention should be paid to the size and location of windows, which are ‘the eyes of the building’. Each street should be distinctive so that a person gains a sense of place. Trees should be planted along wide verges and these should be spaced so that they do not look stunted. Landscaping should be designed to encourage wildlife habitat and biodiversity. Two examples of good design in Southwold are on East Street and the new service station. Southwold Town Council draws attention to the importance of strict validation requirements because many applications lack adequate detail. The Town Council cited examples of poor design and stated that it was important for applicants to consult the Suffolk Design Guidance and to hold pre application discussions with the Town Council and the Suffolk Design and Review Panel as well as the design and conservation officer. There should be greater dialogue with parish councils and communities who have to live with the consequences.
of bad design. It needs to be recognised that poor design impacts upon communities and people’s quality of life. Waveney District Council should heed NPPF guidance that development provides the opportunity to enhance design. Planning provides the opportunity to replace mediocre design with high quality design so in the case of conversions there should be a requirement to fix past mistakes. Southwold Town Council stated that detailed design guidance should be applicable to all sites. Southwold Town Council agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

Reydon Parish Council stated that Council policies should encourage innovative, sustainable design that is in keeping with the landscape and avoids pastiche. Renewable energy systems should be encouraged wherever possible, including in conservation areas. Parking policies should prevent on street parking to reduce congestion and improve the streetscape.

Kessingland Parish Council stated that development should demonstrate high quality and sustainable design. In particular it should:

- Create places and spaces for people.
- Reflect local character and distinctiveness.
- Protect local amenity.
- Create safe, healthy and accessible environments.
- Make good provision for access by all transport modes.
- Ensure adequate vehicle parking facilities are provided in line with Neighbourhood Plan policies TM1 and TM2, with off road spaces designed so that they will be used for parking.
- Ensure accessible environments that prioritise cycle and pedestrian access and provide linkages with surrounding housing, employment services, facilities and spaces.
- Provide, conserve and enhance biodiversity and create linkages between greenspaces and wildlife corridors.
- Incorporate Sustainable Drainage Schemes unless following adequate assessment, soil conditions and/or engineering feasibility demonstrates this method is inappropriate.
- Incorporate measure to minimise water and energy consumption, through carefully considered design, layout, and orientation to make provision for recycling waste, in particular ensuring that an adequate bin storage area is provided.

Carlton Colville Parish Council stated that open space should be consolidated into larger areas. However there should be enough space to maintain privacy as well as adequate sound insulation and parking.

Ilketshall St. Margaret Parish Meeting agreed that Building for Life 12 should be used as a tool to improve the quality of new development.

Other Organisations

Southwold and Reydon Society identified some distinctly quirky architectural styles in both Southwold and Reydon. The society was keen to preserve architectural heritage but was not opposed to new building styles, which were generally favourable to pastiche. Parking standards must ensure that streets are kept free from excessive parking to ease congestion and improve the streetscape. Southwold and Reydon
Society stated that the Council must encourage innovative and sustainable design and discourage pastiche. Renewable energy systems must be used in new housing wherever possible, including in Conservation Areas. The Southwold and Reydon Society stated that the Local Plan should include design principles that were applicable to all sites.

Suffolk Police stated that good design incorporated good architectural design with the principles of Secured by Design. Previous developments have too often increased the risk of crime and the fear of crime. Once established these problems are hard to eradicate. Designing out crime in public areas includes natural surveillance over public areas, careful design of parking areas and the provision of defensible space. Suffolk Police emphasised the importance of creating designs that minimised crime. Council policies should ensure that new designs comply with recommendations in Secured by Design and Homes 16, which are both cited as evidence based guidance about using building design to reduce crime. Too often this aspect of development is ignored. Police Designing Out Crime Officers are experts in reducing crime through good design and ensure that Secured by Design principles are incorporated into new developments. Developments of 10 dwellings or greater should be required to meet Secure by Design Bronze standard or higher. Designers and developers should seek early consultation with the Police Designing Out Crime Officer to ensure that crime reduction considerations can be incorporated. Suffolk Police supported policies that encouraged crime reduction measures at the earliest stages of the design process. Recommendations are inexpensive and can reduce the management burden for landlords and fewer problems for owner occupiers. Suffolk Police supported the objective of Building for Life 12 to create development that is safe and provides everything that is expected of a new community. They encouraged developers to make contact with the police to ensure that new designs promote safety.

Developers/Landowners

Badger Building in response to questions 73 and 74 drew attention to its Pegasus Boatyard Scheme, which is due for commencement in September. Design in Lowestoft has emerged as ‘safe’ and ‘cheap’ owing to a lack of buoyancy in the market. Good design does not cost more but the materials needed to achieve it add to construction costs. Lowestoft is not a premium market and so it is unlikely that purchasers will pay more for additional costs. Simple lessons include proportions, ratios of windows to wall space and roof detailing can all improve the appearance of a building. The Essex Design Guide of 1973 remains the best design guidance. Design guidance should stress that good design adds value not cost rather than espousing the views of officers or detailing design policies. Badger Building did not agree that detailed planning policies should be provided for every site but agreed that design briefs for the larger sites would be useful. Badger Building opposed the inclusion of Building for Life 12 if it was applied subjectively.

Wellington Construction stated that the design of new build development is a matter of personal taste.

Lawson Planning Partnership stated that design guidance was a good way of ensuring high quality design provided that it does not become restricting. Design guidance should only be prepared for larger sites. For smaller sites a general design policy will be adequate. Excessive guidance will stifle innovative development. Lawson Planning Partnership recognised the ability of Building for Life 12 to improve design quality but added that it should be included in the Local Plan as guidance not policy.
St. John’s Hall Farms suggested that the Local Plan should only include key design principles. Detailed design guidance would delay development and should be confined to supplementary planning documents.

**Members of the Public**

Members of the public stated that good design should combine provision of open spaces and realistic recognition of parking needs. Good design should include solar roof panels and permeable parking spaces. Saberton developments were identified as being of a high quality. Contemporary designs were favoured and there was a suggestion that good examples of continental design should be used. A well-designed development needs to meet the needs of its occupants and contribute to the community. Another respondent favoured more traditional designs for a mixture of 2, 3 and 4 bedroom houses. The Persimmon development on the eastern side of Beccles was identified as a good example. Taylor and Green designed Council houses are cited as good developments that site well within the landscape.

Members of the public stated that design should incorporate features such as the Passivhaus standard and sustainable transport links. Realistic levels of storage space, gardens and parking spaces need to be provided as well as some diversity in design. It will also be necessary to prevent parking on pavements and parking by commercial vehicles. Extensions to starter homes should be prevented. One respondent stated that design should be based on eras when quality of design was important.

Members of the public generally believed that detailed guidance should be applicable to all sites. One applicant stated that new development should comply with Building for Life 12. For developments of greater than 20 dwellings it will be necessary for transport modelling to take place, which will be proportionate to the scale of the development. Another stated that the Local Plan should not include detailed design guidance which would be onerous and delay the planning application process. The Local Plan should include design principles with detailed guidance confined to supplementary documents. One applicant stated that there should be more guidance for larger developments that will have greater impact. One applicant stated that design will vary from site to site and so guidance on all sites is inappropriate.

Members of the public supported the inclusion of Building for Life 12 as a planning tool provided it did not increase prices beyond the reach of homebuyers.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.29 takes into account many of points and suggestions about good design referred to above. The policy and the supporting text addresses the points made by Suffolk Police about designing out crime. Policy WLP8.28 addresses points made about sustainability.

Policy WLP8.29 requires major residential developments to be assessed against Building for Life 12. Policy WLP8.29 applies to all developments, but the Local Plan does contain some more site-specific design guidance in respect to some of the allocated sites.
Q77 Should large scale developments in the form of new settlements or urban extensions be required to follow ‘garden city’ principles?

11 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Ilketshall St. Margaret Parish Council agreed that large scale developments and urban extensions should follow ‘garden city’ principles.

North Cove Parish Council agreed that large scale developments and urban extensions should follow ‘garden city’ principles.

Southwold Town Council agreed that large scale developments and urban extensions should follow ‘garden city’ principles.

Other Organisations

Suffolk Police criticised ‘garden cities’ for their singular focus on aesthetics at the expense of safety and other issues that face modern communities. Garden city principles have been altered over the years and it is no longer clear what they are. However providing spaces for play and social interaction, which are also subject to surveillance from occupied ground floor windows, together with well designed parking, are all positive design attributes.

Developers/Landowners

Wellington Construction stated that ‘garden city’ principles were tried and tested.

Badger Building cautioned that ‘garden city’ principles may be at odds with the Councils’ aspirations for housing density. New development must maximise physical features and provide good connectivity and open spaces. Parking and road access tends to dictate layout and regard must be had to this.

Members of the Public

Members of the public were mostly supportive of garden city principles for new settlements or urban extensions. However there was some confusion about what the term meant and one respondent stated that if large scale development was needed then local needs should outweigh garden city principles.

How these comments have been taken into account in the First Draft Local Plan
Sites allocated by Policy WLP2.12 in North Lowestoft and WLP3.1 in Beccles require developments to be built to garden city principles. Most garden city development occurs at approximately 30 dwellings per hectare which is consistent with the density guidance in Policy WLP8.30 of the Local Plan.

Q78 a) Should we set a minimum housing density for new developments? b) If so what should it be?
(20 respondents) Q79 Should different design principles be applied to housing development at high/low densities? (For example, avoid using detached housing at higher densities in order to maintain sufficient space between buildings)(16 respondents)

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

Southwold Town Council suggested no minimum housing standards because this will depend on the quality and setting of the design. Density should be a factor in applying Building for Life 12.

Carlton Colville Town Council supported a maximum density of 30 dwellings per hectare. Carlton Colville Town Council replied that different design principles should possibly be applied at different densities.

Oulton Parish Council stated that there should be no minimum density but rather a maximum density. A maximum density of 50 dwellings per hectare was considered too many and could cause problems with excessive on street car parking.

Ilketshall St. Margaret Parish Meeting agreed with the question and suggested a minimum density of 30 dwellings per hectare. Ilketshall St. Margaret Parish Meeting agreed that different design principles should be applied at different densities.

North Cove Parish Council strongly agreed that different design principles should be applied at different densities.

Other Organisations

The Southwold and Reydon Society stated that housing density should be maximised to reduce the encroachment into the countryside. However this should also be judged on context.
Developers/Landowners

Badger Building disagreed with the question on the grounds that this is a market issue. Badger Building stated that a principle of good design is sufficient. If there is insufficient space between properties then the site is being overdeveloped and planning permission can be refused.

Lawson Planning Partnership agreed that there should be a minimum density but added that this would vary from place to place. Policies should be flexible to ensure that suitable sites should not be left undeveloped because the minimum housing density cannot be met on a site that could be developed. In some cases enforcing minimum housing densities may be too restrictive and unnecessarily compromise design. Lawson Planning Partnership stated that it is inevitable that design will vary according to density. Detailed design guidance should be contained in an accompanying supplementary planning document. Design principles should focus on providing high quality design while not stifling innovative development. Therefore they should take the form of guidance rather than policy.

St. John’s Hall Farms suggested that the Local Plan should not set minimum housing densities. This approach fails to take account of local character or the housing market which will change over the life of the Local Plan.

Wellington Construction stated that housing densities should be based on local character unless circumstances dictated otherwise. Wellington Construction stated that different design principles should not necessarily be applied to housing developments at different densities.

Members of the Public

Members of the public were divided about whether there should be a minimum density for developments across the District. However there was a general consensus that housing densities should be sensitive to the site and its surrounding area. One respondent suggested that maximum densities were likely to increase on street parking. Another suggested that imposing a common approach could restrict open space and car parking provision.

Members of the public were generally agreed that design guidance should change according to housing density. Design guidance was felt to be important to help maintain privacy but that it needed to be appropriate to the size of dwelling. Two respondents favoured terraced housing but one of them added that it could create issues with car parking. Another stated that design will vary from site to site and that developers should not incur any further costs.

How these comments have been taken into account in the First Draft Local Plan

In light of the comments above, Policy WLP8.30 takes a flexible approach to residential density and requires it to be design lead. In Lowestoft and the market towns the Policy requires development to be at
least 30 dwellings per hectare unless local character indicates otherwise. The policy includes extra design guidance for developments built at 30 dwellings per hectare or more.

Q80 Should we adopt additional optional technical housing standards in respect of water, access and national space standards for new residential development?

14 respondents

Statutory Consultees

The Environment Agency strongly encouraged the Council to include policies requiring higher standards of water efficiency than those currently required by building regulations. However this should not threaten the viability of development. New buildings must meet the Buildings regulations standards of 125 litres per person per day. Where necessary this can be 110 litres. Evidence to support tighter water use regulations includes the Water Stressed Areas classification, River Basin Management Plans or Water Cycle Strategies. Water efficient buildings carry many benefits, including: energy savings; meeting Water Framework Directive requirements; Reducing stress on watercourses; increasing resilience to climate change; contributing towards sustainable growth.

Parish and Town Councils

Southwold Town Council agreed that additional technical standards were necessary, stating that some new homes in Southwold had less than the national internal minimum requirement for floor space standards and that this affected their amenity. The Town Council does not agree that providing less than national standards of floor space is essential to viability. Importing national standards into the Local Plan is the only way to maintain choice and protect the consumer at a time of chronic undersupply. With regard to social housing, public sector housing should meet the meet the standards set by the Government.

Ilketshall St. Margaret Parish Meeting stated that additional technical standards should only be adopted in regard to water.

Carlton Colville Town Council agreed that additional technical standards in respect of water, access and national space standards should be adopted.

Developers/Landowners

Badger Building disagreed that additional optional standards were required, stating that these were not justified by local circumstances.

Lawson Planning Partnership stated that the Council should not adopt technical housing standards because this will impact upon viability. National space standards would also restrict the variety of housing
that could be provided and create additional burdens in an already weak market. Adoption of space standards could compromise other elements of schemes.

Rentplus stated that the Council should assess the viability impacts and local need for the national space or accessibility standards. Both of these aspects are requirements for the introduction of these standards. The Council should ensure that the introduction of these standards will not impact upon the ability to deliver housing that meets local needs.

St. John’s Hall Farms suggested that the Local Plan should not include national space standards unless there is a very good reason to do so. To do so could affect the viability of some schemes and the affordability of some homes. Building Regulations will change to achieve the same outcomes and this is a more effective way of securing high building standards.

**Other Organisations**

No comments were made in response to this question.

**Members of the Public**

Members of the Public supported the introduction of optional technical standards in terms of space arguing it was critical to provide high quality housing in both the private and public sectors. The mix of housing should be appropriate to the needs of local people and not set by developers.

However one respondent stated that the Local Plan should not include national space standards unless there is a very good reason to do so. To do so could affect the viability of some schemes and the affordability of some homes. Building Regulations will change to achieve the same outcomes and this is a more effective way of securing high building standards. Another respondent favoured the introduction of technical standards for water and access but not space.

**How these comments have been taken into account in the First Draft Local Plan**

The Council does not consider there is sufficient evidence to implement the national space standards. Most new housing developed in the District is already meeting the standards, therefore to implement the standard would result in unnecessary bureaucracy.

Evidence from the Water Cycle Study (2017) suggests the technical standard for water is justifiable and Policy WLP8.28 requires compliance with this.

Evidence from the Strategic Housing Market Assessment (2017) suggests the technical standard for adaptable and accessible homes is justified and Policy WLP8.1 requires 5% of homes on sites above 20 to be built to this standard.

The viability of these standards will be assessed following the consultation on the First Draft Plan.
Q81 When would development of residential gardens be inappropriate?
14 respondents

Statutory Consultees

No comments were made in response to this question.

Parish and Town Councils

North Cove Parish Council stated that development in residential gardens would be inappropriate if it results in large houses on small plots.

Carlton Colville Town Council stated that development of residential gardens was inappropriate when it increased housing density beyond an acceptable level and creates overcrowding.

Ilketshall St. Margaret Parish Council stated that development of residential gardens would very rarely be inappropriate.

Kessingland Parish Council drew attention to National Planning Policy Framework paragraph 53. The Parish Council stated that development should not impact upon the appearance or existing pattern of development. Kessingland Neighbourhood Plan contains a section on infill development to prevent overdevelopment and protect the existing character of the street.

Southwold Town Council supported preventing development in back gardens and yards because the town is already densely developed and such spaces lighten the fabric of the town. There are very few properties with large gardens in Southwold and these should be maintained because they are attractive to families. Small buildings of a high quality may be acceptable in gardens in other communities. Elsewhere small buildings of high architectural quality could be acceptable in large gardens. Where a building is described as a studio or workspace planning conditions should be attached to prevent its future use as a holiday let.

Other Organisations

Southwold and Reydon Society stated that proposals to develop in back gardens should require special justification, especially in Southwold which is already densely developed and this should rarely, if ever, be permitted.

Developers/Landowners

Badger Building stated that when there was sufficient access and there is sufficient space left for the donor property with a good relationship between the two then garden development is not necessarily bad.
Wellington Construction stated that garden developments should only be restricted if residential amenity is significantly affected.

**Members of the Public**

Members of the public felt that development in residential gardens was inappropriate if it harmed the amenity of a neighbouring property, made housing densities too high, resulted in overlooking, or created access issues. Issues could be further exacerbated by large extensions made at a later date. Reducing the size of the garden below that which would be appropriate for the size of the property was also viewed as unacceptable. One respondent stated that gardens were valued as havens for wildlife and sources of food which should not be developed. One respondent stated that residential development might be acceptable in a larger space (such as a paddock) with good road access. In these cases the new houses should be of a high standard and relate well to the surrounding area. Another respondent stated that decisions should be made on a case by case basis.

**How these comments have been taken into account in the First Draft Local Plan**

Policy WLP8.31 provides specific design requirements for this type of development taking into account the points raised above.

**Healthy communities**

Q82 What size residential development should provide on-site recreational open space? (14 respondents)

Q83 Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential development? or, should the Council require the provision of recreational open space on residential developments to be based on the needs set out in the Green Infrastructure Strategy? (9 respondents) Q84 If we continue to set a standard, what should the standard be? (6 respondents)

**Statutory Consultees**

No comments were submitted in response to these questions.

**Parish and Town Councils**

Carlton Colville Town Council suggested that on-site open space should be calculated per dwelling.

Ilketshall St Margaret Parish Meeting stated the existing policy approach is appropriate. Ilketshall St Margaret Parish Meeting suggested a ‘per dwelling’ standard. Ilketshall St Margaret Parish Meeting suggested a standard per 20 dwellings.
Kessingland Parish Council stated that open space provision in the village was being addressed in the Neighbourhood Plan and was based on the Waveney Green Infrastructure Strategy.

North Cove Parish Council referred to existing shortfalls and the need to consider the open space in the wider context of green infrastructure.

Oulton Parish Council stated that open space should be provided by all developments.

**Developers/Landowners**

Badger Building suggested that open space should be provided on-site for development larger than 30 dwellings unless there is provision within 1000m that could be upgraded. This could be addressed through commuted sums. Badger Building suggested the policy requirement should be based on need rather than a fixed standard. In response to question 84, Badger Building suggested the NFPA Six Acre Standard should be used.

Lawson Planning Partnership Limited stated that open space provision should take into account the surroundings of the development and open spaces that may be located nearby.

Wellington Construction Limited suggested developments larger than 10 dwellings should provide open space but maintenance would be an ongoing issue.

**Members of the Public**

Six members of the public commented on the provision of open space:
- existing standards appear appropriate;
- all development should provide open space;
- sites larger than 10 dwellings should provide open space;
- nearby open spaces should be taken into account;
- maintenance is an ongoing issue.

Four people provided comments on question 83 and suggested that small open spaces should serve new development but larger developments should provide open space that will meet the needs of the wider community taking into account existing facilities while such provision should be delivered to meet the needs set out in the Green Infrastructure Strategy.

Three people provided comments on question 84 and suggested the standard should follow the recommendations in the Green Infrastructure Strategy while standards should be flexible to take into account existing provision. If there was a standard it should not be less than a specific amount of open space per individual dwelling.
Policy WLP1.4 requires open space on sites greater than 1 hectare. It was thought that an area based threshold was better than a per dwelling threshold due to differing densities of sites. A site of 1 hectare is considered large enough to provide a useable open space. The policy requires provision to based on the needs identified in the Waveney Green Infrastructure Strategy and Open Space Needs Assessment. The six acre standard referred to by Badger Building was not considered appropriate because it only relates to children’s play and playing fields, and the type of open space which could be provided on-site could be more varied dependant on local needs.

Q85 Should we identify and designate Local Green Spaces? If so are there any areas which you think would qualify?
21 respondents

Statutory Consultees

The Environment Agency supported the designation of Local Green Spaces. They can contribute towards higher soil quality, improving the ecosystem flood mitigation and climate regulation.

The Broads Authority noted that Norfolk authorities are working together on the health infrastructure requirements generated as a result of the Objectively Assessed Needs work carried out in each of the Districts.

Parish and Town Councils

Carlton Colville Town Council supported the designation of Local Green Spaces specifically identifying:
- the field between Church Lane and Chapel Road which forms a triangle apposite St Peter’s Church as it preserves views of the church and contributes towards the semi-rural character of Carlton Colville; and
- the green space along Beccles Road between the housing and Carlton Marshes which is important for wildlife and the open character of the area.

Ilketshall St Margaret Parish Meeting supported the designation of Local Green Spaces.

Oulton Parish Council suggested the site identified previously identified for a primary school located at Fallowfields in Oulton should be designated as a Local Green Space and provide with play equipment and an area designed to be semi-natural in character.

Southwold Town Council supported the designation of Local Green Spaces and identified:
- Tibby’s Green; and
- the allotments located on Blyth Road.
Other Organisations

The Suffolk Wildlife Trust supported the provision of high quality green spaces and the designation of Local Green Spaces.

Developers/Landowners

Badger Building supported the designation of Local Green Spaces.

Members of the Public

There was a general consensus among the thirteen members of the public who commented that Local Green Spaces should be designated. It was suggested that Local Green Spaces should be large enough to make a difference including the creation of wildlife corridors between new and existing development.

The following are existing open spaces put forward for consideration:

- Meadow Gardens between Beccles cemetery and the shared-use path (Beccles);
- Meadows at Puddingmoor (Beccles);
- North Denes from Links Road to the existing caravan site (Lowestoft);
- Cricket field, Station Road (Somerleyton);
- all existing open spaces including allotments, parks, sports fields and play areas.

How these comments have been taken into account in the First Draft Local Plan

Although some suggestions of spaces are made above, there was insufficient justification as to why these spaces were demonstrably special to the local communities. As such the First Draft Local Plan does not identify any Local Green Spaces and instead devolves this responsibility to Neighbourhood Plans. However, Policy WLP8.23 does provide a level of protection to all open spaces in the District.

Q86 Should we restrict the development of fast food outlets within 400 metres of nurseries, schools and colleges? (16 respondents) Q87 Within town centres should we restrict the number of fast food outlets in shop frontages? (14 respondents)

Statutory Consultees

No comments were submitted in response to these questions.

Parish and Town Councils

Such a restriction was supported by:

- Carlton Colville Town Council;
Other Organisations

Such a restriction was supported by Southwold and Reydon Society.

Developers/Landowners

Badger Building supported such a restriction.

Members of the Public

Ten members of the public commented with eight of these supporting the restriction. One respondent who did not support the proposal and it was suggested that it would not be practical in Beccles.

Six people supported the restriction in town centres. With two stating it was not practical and that new outlets, including healthy options, could add to the existing offer in a retail area while another did not support the proposed restriction.

How these comments have been taken into account in the First Draft Local Plan

On reflection it is not considered that such a policy approach would be effective in reducing obesity, so the First Draft Local Plan does not contain such a policy.

Biodiversity

Q88 Should development be required to deliver the recommendations of the Green Infrastructure Strategy with respect to networks of biodiversity?
24 respondents

Statutory Consultees

The Broads Authority noted that there are early conversations about preparing a Norfolk-wide green infrastructure map. The Broads Authority could consider recommendations in the Green Infrastructure Strategy and how these could be brought forward as part of the Broads Local Plan as appropriate.

The Environment Agency supported the designation of Local Green Spaces. They can contribute towards higher soil quality, improving the ecosystem flood mitigation and climate regulation.

Greater Norwich Local Plan team supported delivery of the Green Infrastructure Strategy through new development. The Greater Norwich Green Infrastructure Plan is held up as national good practice and they
would be happy to work with Waveney officers to ensure that any cross-boundary ecological network connections are taken.

Natural England stated that new development should incorporate opportunities to enhance biodiversity wherever possible. A key principle is to maintain connectivity. Land of least environmental value should be used in accordance with paragraph 165 of the NPPF. Where a plan area contains irreplaceable habits there should be policies in place to ensure their protection. Provision for green infrastructure should be included within a specific policy in the Local Plan or integrated into relevant other policies such as biodiversity, green space, flood risk and climate change.

Parish and Town Councils

Delivery of the Strategy through new development was supported by:

- Carlton Colville Town Council;
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Southwold Town Council.

Kessingland Parish Council noted they had used the Green Infrastructure Strategy to inform their Neighbourhood Plan.

Other Organisations

Suffolk Wildlife Trust supported delivery of the Strategy through new development.

Developers/Landowners

Badger Building supported delivery of the Strategy through new development.

Members of the Public

All thirteen responses by members of the public supported the delivery of the Green Infrastructure Strategy through new development.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.32 takes into account the consensus of opinion above a requires regard to be had to the Waveney Green Infrastructure Strategy to help enhance biodiversity.

Q89 What level of protection should be given to locally designated sites of biodiversity value?

20 respondents
Statutory Consultees

Natural England stated the Local Plan should set out criteria based policies for the protection of biodiversity and geological sites reflecting the level of protection they have. SSSIs, European sites and Ramsar sites should be identified on the Proposals Map. It was stated the Local Plan should be subject to a Habitat Screening Report under Regulation 102 of the Conservation of Habitats and Species Regulations (2010) at an early stage. It may be necessary to outline avoidance and/or mitigation measures in the Local Plan, including a clear direction for project level HRA work to ensure no adverse effect on internationally designated sites. Cross-boundary policies may be need to be considered.

Parish and Town Councils

Carlton Colville suggested the highest protection possible.

Ilketshall St Margaret Parish Meeting suggested these areas should be protected as per national policy.

Oulton Parish Council said that where sites are supported by voluntary organisations these groups should be supported.

Southwold Town Council said these areas should have enhanced protection. They would like to see greater restrictions on the paving of garden land and the benefits this can have for biodiversity. An approach set out by the Royal Horticulture Society could be considered in Local and Neighbourhood Plans. The Fortune Green and West Hampstead Neighbourhood Plan was cited as an example to protect trees and planting (policy 18).

Other Organisations

The Southwold and Reydon Society stated the strongest protection possible should be given to designated sites of biodiversity value.

Suffolk Wildlife Trust stated that County Wildlife Sites (CWS) should be strongly protected from the impacts of new development. CWS should not be allocated for new development and any allocations near a CWS should be carefully assessed to ensure they would not result in any adverse impact on the ecological value of the site.

Developers/Landowners

Badger Building suggested sufficient protection to prevent them from being lost.

Members of the Public

Twelve people responded and there was strong support for high levels of protection to be given to biodiversity sites. Additional comments included the need to raise the standard higher than what we
currently have and that local designated sites should have the same protection as nationally protected sites.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.32 protects locally designated sites of biodiversity value. It requires proposals which may have a direct or indirect effect on these sites to mitigate or the effect or provide compensatory measures.
Landscape

Q90 What landscapes in Waveney do you think are the most valuable and worthy of protection in the Local Plan? (24 respondents) Q91 Should we continue the strong protection given to rural river valleys and tributary valley farmlands? (23 respondents)

Statutory Consultees

The Broads Authority suggested the Local Plan should set out how the setting of the Broads will be considered, protected and enhanced.

Natural England stated the plan should have strategic policies to protect and enhance valued landscapes along with criteria based policies to guide development. They stated that the Council should take into account the AONB Management Plan and views of the AONB Partnership. Development proposals should avoid significant impacts on protected landscapes and consider the development tests set out in paragraph 116 of the NPPF.

Suffolk County Council suggested the new Local Plan will need to protect and enhance the diverse landscape and ecology features in the District by minimising recreational disturbance to designated wildlife sites and delivering a coordinated approach to green infrastructure. More specifically:

- there are two sites north of Lowestoft used to mitigate the impact on skylarks by two large infrastructure projects and development in this area should consider this;
- a strategic approach to development south of Lowestoft would be welcomed;
- development along the Beccles Southern Relief Road is unlikely to be affected by ecological and biodiversity constraints;
- a buffer zone between development proposed in the north of Beccles and the Beccles Marshes is essential;
- in Southwold and Reydon there is likely to be the need for additional provision of open space and green infrastructure for the scale of development to minimise recreational impact on protected sites.

Parish and Town Councils

Carlton Colville Town Council suggested the Broads and the Carlton Marshes should be protected.

Ilketshall St Margaret Parish Meeting stated that the current level of protection should be continued for the rural river valleys and tributary farmland areas.

Kessingland Parish Council stated the beach and heathland areas along the coast are part of the AONB and Heritage Coast. This area is also designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC).
North Cove Parish Council suggested Beccles Common, the area around Carlton Nature Reserve and existing breaks between villages to be protected.

Oulton Parish Council suggested Oulton Marshes and Carlton Marshes for protection.

Southwold Town Council suggested that Neighbourhood Plans are best positioned to identify landscapes that are important to them that should have extra protection. New development should be required to fit in with the character of the landscape.

The proposal to continue with strong protection of rural river valleys and tributary farmland was supported by:
- Carlton Colville Parish Council;
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Southwold Town Council.

Other Organisations

Southwold and Reydon Society suggested the protection of the AONB should be reiterated in the Local Plan. There should be little or no development in the countryside situated within AONB. Southwold and Reydon Society supported protection for rural river valleys and tributary valley farmland.

Developers/Landowners

Badger Building stated there were landscapes to value in the District with the river valleys being one of the most important.

Gladman Developments Limited suggested the current requirements requiring an applicant to demonstrate there is an overriding national need for a development and that no alternatives sites are available is too onerous and not consistent with paragraph 113 of the NPPF. To be considered a valued landscape their value must be a demonstrable physical attribute rather than just a popular landscape. The Waveney Landscape Character Assessment will likely need to be updated.

Members of the Public

Areas that were identified and should be considered for protection include:
- land on Lowestoft Road between Park Drive and Old Farm Road for views across the Common and the Waveney Valley (Beccles/Worlingham);
- Beccles Quay and Beccles Common (Beccles);
• the gap between Reydon and Southwold which is part of the AONB and important for flora and fauna;
• coastal areas;
• Waveney Valley;
• woodlands;
• areas with long vistas across the open countryside.

Ten people responded and have suggested that protection be afforded to landscapes as they are at present. It was also stated that areas should be considered on their own merits and not prioritised. It was recognised that important landscapes are important for attracting people to the area and amenity for people who live locally.

Fourteen people supported the continuation of the approach to protect rural river valleys and tributary valley farmland. It was suggested there could be some flexibility where the development was of a very high environmental standard with a minimal impact on the landscape.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.33 provides protection for the setting of the Area of Outstanding Natural Beauty and the setting of the Broads. It also provides protection for tributary valley farmland and rural river valleys.

The Area of Outstanding Natural Beauty itself is given high levels of protection in the National Planning Policy Framework and it is not considered necessary to repeat this protection in the Local Plan.

The Council is not responsible for planning policy within the Broads area. The Broads Authority is preparing a new Local Plan for the Broads.

Q92 Should we continue to identify ‘Strategic Gaps’ between Lowestoft and Kessingland, Lowestoft and Hopton and Halesworth and Holton? Or, should we instead have a more general policy which aims to avoid the coalescence of settlements)? (24 respondents) Q93 If we retain the ‘Strategic Gap’ policy, are there any other gaps between existing settlements which would benefit from a ‘Strategic Gap’ policy? (12 respondents) Q94 If we retain the ‘Strategic Gap’ policy, should it be a Strategic Policy requiring proposals in Neighbourhood Plans to be in conformity with the policy? (11 respondents)

Statutory Consultees

No comments were submitted in response to these questions.

Parish and Town Councils

The continued use of Strategic Gaps was supported by:
Carlton Colville Parish Council; Ilketshall St Margaret Parish Meeting; Kessingland Parish Council; North Cove Parish Council; Oulton Parish Council;

Carlton Colville Town Council suggested Strategic Gaps should be identified between:
- Carlton Colville and Gisleham;
- Carlton Colville and Mutford;
- Chapel Road and Church Lane in Carlton Colville;
- Beccles Road and Carlton Marshes.

Carlton Colville Town Council did not support a strategic policy.

North Cove Parish Council suggested the open views in Barnby as one enters the village and the gap between North Cove and Barnby.

Southwold Town Council supported the strategic gaps and added that they should all be enhanced with Local Green Space designation.

A strategic policy approach was supported by:
- Ilketshall St Margaret Parish Meeting;
- North Cove Parish Council;
- Oulton Parish Council.

Other Organisations

No comments were made in response to these questions.

Developers/Landowners

Badger Building stated the Strategic Gaps have an important part in separating settlements but these should be reassessed on the ground (e.g. coherent boundaries). Badger Building stated that the Council should take account of Neighbourhood Plans that support some development in the Strategic Gap.

Gladman Developments Limited stated that development could be located in Strategic Gaps without the merging of settlements and suggest this approach may not be consistent with the NPPF. Criteria based policies may be more appropriate.

Wellington Construction Limited stated that a suggestion of a new settlement near Corton is not consistent with this approach.
Members of the Public

Fourteen people responded and it was suggested there should be a policy to stop the coalescence of settlements regardless of their size in order to retain their character. There was support for retaining Strategic Gaps, however, as Strategic Gaps fill in over time, green corridors for wildlife should be protected. It was suggested that a Strategic Gap policy was not consistent with the NPPF.

Strategic Gaps between the following settlements were suggested:

- Beccles and Worlingham;
- Beccles and Ringsfield;
- Beccles and Carlton Colville;
- Beccles and villages to the south, east and west;
- Between Barnby and Mutford;
- Mutford and Carlton Colville;
- Kessingland and Blythburgh;
- Blythburgh and Holton;
- all communities should be delineated by some form of gap.

Six people responded to question 94 and five supported the policy being strategic.

How these comments have been taken into account in the First Draft Local Plan

The retention of strategic gaps has some support through the above consultation responses. However, this approach is considered to have some conflict with national planning policy as it would be effectively establishing new areas of ‘Green Belt’ but with a separate name. It could lead to an overly strict approach where some development which may be appropriate being refused. It could also result in development which could lead to coalescence in areas not specifically designated. Therefore Policy WLP8.34 of the Local Plan presents a criteria based approach to avoid the coalescence of settlements. The supporting text identifies where there may be specific issues in relation to this.

All policies in the First Draft Plan are considered to be strategic.

Q95 Should we continue to identify ‘Open Breaks’ at Lowestoft Road, Carlton Colville, Dip Farm, Gunton and Ollands Plantation and Meadows, Bungay? Are there other areas that could be identified as open breaks? (22 comments) Q96 Are the above ‘Open Breaks’ demonstrably special to the local community and should they be designated as Local Green Spaces which will give them greater protection? (21 respondents)

Statutory Consultees

No comments were submitted in response to these questions.
Parish and Town Councils

Carlton Colville Town Council suggested the following be retained as open breaks:

- Triangle of land between Chapel Road and Church Lane in Carlton Colville;
- Land between Beccles Road and Carlton Marshes in Carlton Colville.

Carlton Colville also suggested sites 7, 21 and 80 should be classified as open breaks.

Oulton Parish Council suggested continuing with the open break designation.

Ilketshall St Margaret Parish Meeting suggested all of the existing open breaks be continued with their designation.

North Cove suggested all of the existing open breaks be continued with their designation.

Oulton Parish Council suggested all of the existing open breaks be continued with their designation.

Other Organisations

No comments were submitted in response to these questions.

Developers/Landowners

No comments were made in response to these questions.

Members of the Public

Members of the public overwhelmingly suggested that all open breaks should be retained.

The importance of the open break located on Lowestoft Road in Beccles /Worlingham was repeated commented upon and is consistent with the Green Infrastructure Strategy.

Open breaks should be provided where they would separate Beccles from surrounding villages and should be retained between Corton – Hopton and Lowestoft –Kessingland.

How these comments have been taken into account in the First Draft Local Plan

Although there is significant support for the retention of open breaks, national planning policy suggests that green spaces should be objectively considered reflecting their circumstances. There is not enough evidence to identify which green spaces are particularly important to communities compared to others. Open spaces important to the character of a settlement and the community can be designated as Local Green Spaces to ensure they have a high level of protection in Neighbourhood Plans instead.
Q97 Are there any areas of Waveney which could be considered areas of tranquillity?
23 respondents

Statutory Consultees

The Broads Authority has recently completed a dark skies study which found the skies were particularly dark around Geldeston. The Authority is preparing a policy on light pollution and would welcome WDC considering dark skies near sensitive areas.

Natural England suggested areas of tranquillity should be identified and provided appropriate policy protection as set out in paragraph 123 of the NPPF. The Campaign to Protect Rural England (CPRE) has mapped areas of tranquillity which are available and could be used as an evidence base for the Local Plan and Sustainability Appraisals.

Parish and Town Councils

Carlton Colville suggested the Carlton Marshes should be protected to reasons related to tranquillity.

Ilketshall St Margaret Parish Meeting suggested areas between rural settlements meet the definition of tranquillity.

North Cove Parish Council suggested the Carlton Nature Reserve should be protected from housing development.

Southwold Town Council suggested the AONB and Heritage Coast should be identified for reasons of tranquillity. Additionally, Neighbourhood Plans should have the opportunity to identify areas of tranquillity.

Other Organisations

The Lowestoft & Yarmouth Regional Astronomers Society suggested sites 164, 165 and 166 north of Lowestoft should be considered in the context of tranquillity. Light pollution results from light nuisance (the unwelcome intrusion of light from nearby premises), sky-glow (damage to the night sky) and glare which causes discomfort and can be a hazard to road users and pedestrians. The increasing impact of sky-glow has been the result of poorly aimed street light and floodlights, overpowered and poorly mounted household security lights and over the top sports lighting. It was stated the best method for dealing with light pollution in the case of new developments is at the planning stage by pre-empting any light waste by influencing design of lighting schemes and the insertion of planning conditions. Citing recommendations by the CPRE which has suggested planning policies should specifically require detailed consideration of lighting schemes and impacts and reflect guidance set out in paragraph 125 of the NPPF. Green belts have
to potential to contribute towards the tranquilly of an area and reduce the impact of light pollution. Photos provided to demonstrate the impact of light pollution over time.

The Southwold and Reydon Society suggested the area around Southwold and Reydon, the surrounding cliffs beaches and countryside should be considered as areas of tranquillity.

Developers/Landowners

Badger Building suggested the area of The Saints was remote and relatively undisturbed and the landscape should be preserved from all forms of unnecessary development.

Members of the Public

Fourteen people responded and supported the identification of areas of tranquillity. Suggested areas included:

- all of Waveney District;
- all green spaces;
- Coastal areas;
- The Broads;
- Beccles Common;
- The Quay in Beccles;
- The Broads west of Beccles;
- land south of Beccles away from major roads;
- between Beccles and Ringsfield;
- between Ellough and Worlingham (dark skies);
- Southwold and Reydon marshes;
- area between Reydon and Southwold;
- Pakefield Cliffs;
- Marshes around Oulton Broad;
- far western edges of Oulton Broad and Carlton Colville;
- Snakes Lane in Lound (a bridle path from Lound to Ashby Church and Somerleyton);
- The Saints.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.33 provides protection for dark skies and areas of tranquillity across the District. Based on evidence from the Campaign to Protect Rural England and The Broads Authority, the supporting text identifies areas of tranquil nature and dark skies, within the Area of Outstanding Natural Beauty, the rural area near the Saints and the area between Mettingham and Shipmeadow.
Historic Environment

Q98 What could be included in a positive strategy in the local plan for protecting and enhancing Heritage Assets? Examples could include maintaining a list of assets and supporting development which enhances assets. How could such a strategy support and influence Neighbourhood Plans?

10 respondents

Statutory Consultees

Historic England wished to ensure that the historic environment is protected at all stages of the planning process. Waveney has numerous nationally and locally listed buildings and is rich in archaeological content. The New Local Plan will be important in the conservation and enhancement of this historic environment. There are four heritage assets in Waveney District that are listed on the Heritage at Risk Register.

Historic England drew attention to publications it has produced about protecting the historic environment in the plan making process and devising strategies for the protection of the historic environment. Historic England welcomed the identification of the historic environment as a key environmental issue in the Issues and Options document.

Historic England drew attention to National Planning Policy Framework paragraph 126, which requires Local Plans to provide a positive strategy for the conservation and enjoyment of the historic environment. This requires a plan for the use and maintenance of historic assets and for the delivery of development that will conserve and enhance them. This positive strategy will need to include policies that are specific to the historic environment and a thread that runs throughout the Local Plan and applies to all stages of its preparation. Policies may need to be tailored to achieve positive improvements in the historic environment that the NPPF.

With regard to neighbourhood plans it is critical to remember that they are only required to be in conformity with the strategic policies of a Local Plan. Conservation of the historic environment is therefore best achieved through clear strategic policies for heritage.

Parish and Town Councils

Carlton Colville Town Council stated that open land that enhances view of historic buildings should be included as an asset, for example, the triangle opposite St. Peter’s Church, Carlton Colville.

Ilketshall St. Margaret Parish Meeting stated that thought should be given to the reuse of historic buildings to ensure that they remain in use and protected.

Southwold Town Council suggested drawing up a list of buildings of local townscape interest. This has already been undertaken in Suffolk Coastal and Ipswich and would increase public participation and
involvement. Historic England has just revised its guidance on Local Lists. WDC needs to revisit its own local list in the light of these new documents. For local lists to be effective at appeal they need to be subject to public consultation and endorsement by the relevant District council committee.

**Other Organisations**

The Southwold and Reydon Society stated that the Local Plan should provide a list of heritage assets and support for development that would protect and enhance the historic environment. There should also be flexibility to enable development that would keep them in use and sustainable.

**Developers/Landowners**

Gladman Developments Limited considered it necessary that the Council undertake an assessment of the impact of new development upon heritage assets. They drew attention to a recent high court judgement (FODC v SSCLG and Gladman Developments (2016) EWHC 421 Admin) which highlighted the balance between assessing the harm of development versus the benefits of development. This balance should apply to both the decision taking and plan making processes.

**Members of the Public**

Members of the public supported the protection of historic assets but also wanted flexibility that would enable historic assets to continue to be used. Development should also reflect and enhance the historic character of the area.

**How these comments have been taken into account in the First Draft Local Plan**

Policies WLP8.35 through to WLP8.38 help provide a positive strategy for the protection and enhancement of the historic environment, taking into accounts the comments made above.

**Q99 Should we continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from sustainable materials.**

20 respondents

**Statutory Consultees**

Historic England considered it imperative that the Council continues to ensure that replacement windows, doors and porches in conservation areas are of an appropriate design and constructed from suitable materials in order to protect the built form in Conservation Areas. Historic England provides technical guidance on its website about historic buildings and energy efficiency.
Parish and Town Councils

Carlton Colville Town Council agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.

Oulton Parish Council agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.

Ilketshall St. Margaret Parish Meeting agreed that the Council should continue to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from suitable materials.

Southwold Town Council stated that it was necessary to explain why plastic replacements do not work in the long run and to appeal to enlightened self interest by demonstrating that historic features enhance property values. Conservation Area Appraisal Management Plans should promote article 4 directions, which suspend permitted development.

Other Organisations

The Southwold and Reydon Society agreed that there should be control of new windows doors and porches but with some flexibility to allow double glazing in certain circumstances because this would improve energy conservation.

Developers/Landowners

Badger Building stated that control of replacement windows, doors or porches in Conservation Areas was necessary because otherwise these designations would not be worthwhile.

Members of the Public

Members of the Public supported the continued control of materials in replacement doors, windows and porches to ensure that Conservation Areas maintained their unique characters. However one respondent stated that emphasis should be placed on repair and maintenance of existing materials rather than replacement and drew attention to double glazing that can be inserted into sash windows. Another respondent was concerned that too many regulations could dissuade homeowners from making repairs or taking steps to increase the energy efficiency of historic buildings.

How these comments have been taken into account in the First Draft Local Plan

The comments above demonstrate significant support for continuing with the approach to ensure that replacement windows, doors and porches in Conservation Areas are of an appropriate design and constructed from sustainable materials. As such Policy WLP8.37 on Conservation Areas requires proposals
for replacement windows, doors and porches to be of a suitable design and constructed in appropriate materials.

Q100 Are any other controls needed on alterations to buildings in Conservation Areas?
9 respondents

Statutory Consultees

Historic England stated that additional controls may be necessary and that these should be identified through Conservation Area Appraisals and local knowledge. Consideration should be given to a strategy to help heritage assets adapt to climate change, particularly within conservation areas. The Council should adopt a balanced approach between tackling climate change and protecting the built environment. Technical guidance is available on the Historic England website.

Parish and Town Councils

Southwold Town Council stated that it was necessary to stop further changes to the terraces on Lowestoft sea front. If development is proposed for a heritage asset then the opportunity should be used to restore previously damaged significance. Protect non designated heritage assets to conserve both the fronts and backs of properties and to ensure the Local Plan complies with paragraph 126 of the National Planning Policy Framework. It is necessary to improve verification requirements to ensure heritage assessment is proportionate, focused, sufficiently detailed and that drawings are to scale and accurate and that accurate contextual photos and models are provided. There should be an example of a model heritage assessment on the Council’s website. The importance of dialogue with the Design and Conservation Officer should be emphasised, which is crucial to achieving a good outcome. Where solar panels are installed on heritage assets this should be undertaken in accordance with Historic England guidance. The Local Plan should require heritage statements to demonstrate that all other conservation measures have been considered and the efficiency gains from solar panels as opposed to alternative conservation measures are sufficiently large to constitute a public benefit that outweighs any damage to the heritage asset and its setting.

Carlton Colville Town Council stated that alterations should be in keeping with the street scene.

Ilketshall St. Margaret Parish Meeting stated that roofing and external finishes should be in keeping with the character of the surrounding area.

Other Organisations

The Southwold and Reydon Society stated that solar panels of an appropriate design should be allowed on the front facing roofs of buildings in conservation areas. Solar panels of any design should be allowed on such buildings if they are not visible from the street.
Developers/Landowners

Badger Building stated that there should be controls over inappropriate painting and cladding and the replacement of traditional roofing materials with man-made products.

Members of the Public

Members of the public stated that alterations needed to be in character with the building and others in the vicinity. There should also be controls of signs and aerials on buildings. One respondent stated that this issue required further discussion.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP8.35 requires the submission of Heritage Impact Assessments with all planning applications for development which may impact on Heritage assets. Policies WLP8.36 and WLP8.37 provide protection for non-designated heritage assets. The Built Heritage and Design Supplementary Planning Document which will be retained and updated, provides more detailed guidance on renewable energy and aerials and satellite dishes.

Q101 What level of protection should be given to non-designated heritage assets and locally listed buildings?

11 respondents

Statutory Consultees

Historic England stated that heritage assets are not only those designated under statutory regimes but also those that are recognised by the local planning authority. Locally significant buildings, structures, features and gardens act as way finders, landmarks and create a sense of place. They are important because of their cultural, historical and architectural contribution and so should be afforded protection. Historic England therefore advocated a specific policy about locally listed buildings and a presumption in favour of retention of heritage assets. The Local List should include all types of heritage assets and its inclusion in the Local Plan will make it a material consideration. However a hierarchy of policies should be devised so that locally listed assets do not upstage nationally listed assets in the Local Plan.

Local Plans should also make provision for archaeological remains, which are also heritage assets. This will ensure that they also receive consideration as part of the development management process. Not all significant archaeological remains are scheduled and so archaeological investigation should take place where archaeological potential is suspected prior to consideration of allocation in the Local Plan or a planning application. Overall, Historic England stated that the more significant an asset the greater the weight that should be attached to its protection.
Parish and Town Councils

Carlton Colville Town Council stated that non-designated heritage assets and locally listed buildings should be afforded the highest level of protection.

Ilketshall St. Margaret Parish Meeting stated that the local list should be maintained.

Kessingland Parish Council drew attention to the National Planning Policy Framework which requires local planning authorities to plan positively for the conservation and enjoyment of the historic environment. Heritage assets are irreplaceable and loss or damage to them should be exceptional with a judgement made about the harm to the heritage asset and its significance. The Parish Council drew attention to the recent planning appeal regarding the proposed demolition of the King’s Head pub. The appeal failed because the inspector considered the site to be of sufficient value to be considered a non-designated heritage asset. The Local Plan should provide protection to all locally listed heritage assets and to buildings in conservation areas that contribute towards their character.

North Cove Parish Council stated that non-designated listed buildings should be afforded great protection.

Other Organisations

The Southwold and Reydon Society stated that locally listed buildings and non-designated heritage assets should broadly receive the same level of protection as buildings in conservation areas currently do.

Developers/Landowners

Badger Building stated that locally listed buildings merely add an extra layer of designation with no statutory protection or grant aid available for restoration. The retention of buildings that have reached the end of their useful life has placed huge burdens on owners. Retention of these buildings is not an economic proposition and should be retained for only the best examples.

Members of the Public

Members of the public supported the protection of listed buildings and non-designated heritage assets. Alterations to non-designated heritage assets or locally listed buildings should only be permitted where they respect the character of the building’s surroundings and the street scene. There was concern that complete redevelopment of an area often resulted in the loss of its historic character. Development should be required to make reference to previous uses on the site. However there was concern that this protection should be underpinned by policies that the Council is willing to enforce where an owner allows a heritage asset to fall into disrepair.

How these comments have been taken into account in the First Draft Local Plan

Policies WLP8.36 and WLP8.37 provide protection for non-designated heritage assets. The policies set out the specific circumstances when a loss of these assets would be permitted.
Evidence

3 respondents

Statutory Consultees

No comments were submitted in response to this section.

Parish and Town Councils

Worlingham Neighbourhood Planning Team noted that the Leisure and Retail needs survey for Beccles does not include Worlingham even though the majority of Ellough Industrial estate is within the boundary of the village.

How these comments have been taken into account in the First Draft Local Plan

The Retail and Leisure Needs Assessment only covers main town centre uses (retail, leisure and community facilities) not industrial premises. The Ellough Employment Area is predominantly made up of industrial units.

Other Organisations

Sport England stated that the evidence base on Page 68 of the document fails to make reference to the completed Playing Pitch Strategy and Sports Facilities Strategy, both of which should be informing proposed policies in relation to the protection, enhancement and provision of indoor and outdoor sports facilities within the district.

How these comments have been taken into account in the First Draft Local Plan

These documents have informed the First Draft Local Plan.

Developers/Landowners

Bourne Leisure stated that ‘The Sunrise Coast Tourism Strategy 2006-2011’ which was prepared in 2006 is outdated and does not provide a robust understanding of the tourism needs within the district. They stated in order to ensure the emerging Local Plan policies in relation to tourism reflect and provide support for the growth and enhancement of Waveney’s tourism sector it will be critical for an up to date data set to be taken into account.

How these comments have been taken into account in the First Draft Local Plan

Comments noted and agreed. There are currently plans to provide an updated Tourism strategy but this has not yet been published.
Other Comments

61 respondents

Statutory Consultees

Anglian Water provided detailed comments on each site option in terms of impact on their assets, the wastewater network and the waste water recycling centres.

How these comments have been taken into account in the First Draft Local Plan

Anglian Water’s comment have provided a useful starting point for the Water Cycle Study 2017.

The Broads Authority stated that the consultation document was well presented and easy to read and follow. They stated that as the plan progresses they would be keen to engage and understand how the Council will address provision of plots for self build, the strategic policies which neighbourhood plans need to be in accordance with, assets of community value, non designated heritage assets and local sites of biodiversity value.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Plan contains guidance on these matters.

The Environment Agency provided further detailed advice on groundwater and contaminated land, water quality, SFRA review and the water cycle study.

How these comments have been taken into account in the First Draft Local Plan

These comments helped inform the scoping of the Water Cycle Study (2017) and the Strategic Flood Risk Assessment which is currently under preparation.

Historic England advised that they have been unable to provide detailed comments on every site but have specifically highlighted sites where there could be issues. Historic England advised of their site selection methodology and recommended that the Council followed it in selecting sites in the plan.

How these comments have been taken into account in the First Draft Local Plan

These comments have been taken into account in assessing sites.

The Marine Management Organisation did not provide a bespoke response to the consultation. They provided generic information about the Marine Plan and marine licensing.

How these comments have been taken into account in the First Draft Local Plan

Comments were noted.
Natural England stated that the Local Plan should avoid allocating areas of high environmental value for development. They stated that this should be demonstrated through sustainability appraisal and habitats regulations assessment. They added that the plan should include policies to ensure protection and enhancement of public rights of way and National Trails. Natural England also stated that the plan should give appropriate weight to soil resources. Natural England stated that the impact from air pollution on habitats from increased traffic should be considered. They stated that designated sites with 200m of a road with increased traffic could be vulnerable to nitrogen deposition/acidification. Natural England stated that they expect the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. They also stated that the Local Plan should consider climate change and the role of the natural environment to mitigate it. Natural England also provided information on different sources of evidence to support the plan.

How these comments have been taken into account in the First Draft Local Plan
These comments have been taken into account in assessing sites.

Suffolk County Council stated that the interrelationship between Lowestoft and Great Yarmouth will be a significant influence on the local economy and, therefore, the development of the options. This will be particularly relevant to the phasing of development to the North of Lowestoft. They added that the Enterprise Zone is an important tool and will need to be factored into the next stage of the plan’s preparation. The Council supported the section of the consultation on healthy communities and noted the importance of encouraging healthy lifestyles. They also noted the need to take into account the Suffolk Mineral Core Strategy and Site Allocations and the Suffolk Waste Core Strategy. Suffolk County Council also provided comments on archaeological issues with respect of the sites consulted on.

How these comments have been taken into account in the First Draft Local Plan
These comments have influenced the contextual section of the First Draft Local Plan. Promoting healthy communities is central to the Local Plan’s vision. The Minerals and Waste Local Plans have been considered in assessing sites.

Parish and Town Councils

Corton Parish Council stated that too much of the consultation overlaps with other ongoing consultations.

How these comments have been taken into account in the First Draft Local Plan
Comments noted. In order to produce a Local Plan against a tight deadline it was necessary to go out to consultation at the time.

Lound Parish Council noted that they held an extraordinary meeting to discuss the consultation and 30 members of the public attended. They distributed consultation forms to encourage responses from people without internet access.
How these comments have been taken into account in the First Draft Local Plan
The Council welcomes the proactive approach taken by the Parish Council to get people involved in the consultation.

St James South Elmham Parish Meeting stated that all areas at risk of or prone to flooding for whatever reason and areas isolated from the transport and service infrastructure should not be identified for development.

How these comments have been taken into account in the First Draft Local Plan
Flood Risk has been taken into account in assessing sites. In order to deliver regeneration priorities in Central Lowestoft it has been necessary to allocate some land in flood zones.

Other Organisations
Beccles Society recommended that for future consultations a public forum format should be used where a panel sits at the top table and the audience asks questions. They suggested that this type of consultation would prevent much duplication of questioning and would also allow the more timid audience members to hear the answers to questions which they may be unwilling to ask themselves.

How these comments have been taken into account in the First Draft Local Plan
The Council continually reviews its methods of consultation and will consider this approach for future consultations.

Southwold and Reydon Society stated that protection is needed for the smaller residential properties in Southwold and Reydon so that they are not easily bought and extended. They added this could be addressed by clear policies to tighten the definition of overdevelopment, to prevent further building in gardens/courtyards at the back of existing properties, at least in the central area of Southwold, and strong provision for any additional parking that may arise from extensions where these are permitted.

How these comments have been taken into account in the First Draft Local Plan
Policy WLP8.31 sets out criteria for controlling new dwellings in residential gardens and other urban infill plots. With respect to extensions, this is more difficult to control, given permitted development rights that allow owners to extend their properties significantly without planning permission. Policy WLP8.29 on Design will ensure overdevelopment is managed.

Sport England stated that no existing playing fields should be allocated for development unless replacement provision of equivalent quantity, quality and accessibility is provided.
Comments noted.

Suffolk Wildlife Trust noted that they hadn’t specifically assessed each proposed allocation site for the known or likely presence of protected and/or UK/Suffolk Priority species or UK/Suffolk Priority habitats. They noted that whilst in their responses on specific sites (below) they have identified a number of sites that we consider should not be allocated for development, this does not mean that sites they have not listed are of no value for wildlife. They added that the Local Plan should be subject to a Habitats Regulations Assessment.

How these comments have been taken into account in the First Draft Local Plan

Comments noted.

Developers/Landowners

Bourne Leisure stated that the importance of tourism to employment should be referred to in the employment section of the Local Plan.

How these comments have been taken into account in the First Draft Local Plan

The First Draft Local Plan has a specific section relating to tourism and the importance of tourism is noted on a number of occasions throughout the document.

Members of the Public

A number of respondents suggested the Council should write to every resident likely to be affected by the plan. One respondent suggested this could be funded by developers/landowners who submitted land. One respondent stated that the website was difficult to navigate.

How these comments have been taken into account in the First Draft Local Plan

The Council will write letters to neighbours of sites which are proposed to be allocated, alongside other publicity associated with the consultation.

One respondent suggested that land to the west of Halesworth, to the west of site 163 may be more appropriate than other sites currently identified in the consultation. One respondent suggested building over the top of car parks in the central parts of Lowestoft by constructing buildings on stilts, allow cars to continue to park underneath them.

How these comments have been taken into account in the First Draft Local Plan

Policy WLP4.2 allocates land to the west of site 163 for residential development. Most development types built over the top of existing car parks are likely to require their parking so without resorting to multi-storey car-parking it will not be possible to maintain the same level of parking in the town centre under this suggestion.
Analysis of Sites Considered

Over 170 potential sites for development were presented for consultation in the ‘Options for the new Waveney Local Plan’ document. 1,218 comments were made on these potential sites. Additionally a number of additional sites were submitted during and just after the consultation. All of these sites are considered in detail below. A summary of the comments made on each site is included. To supplement this, the section below also provides a summary of the draft Sustainability Appraisal for the site and the draft Strategic Housing and Economic Land Availability Assessment for the site.

Sustainability Appraisal is an iterative process which must be carried out during the preparation of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging Local Plan, when considered against alternatives, will help to achieve relevant environmental, economic and social objectives. A draft sustainability appraisal has been undertaken on all the different policy options and site options considered during the preparation of the First Draft Plan. The appraisal tests site and policy options against 17 sustainability objectives. These include:

- Health
- Education
- Crime
- Access to services
- Deprivation
- Housing
- Air quality
- Water quality
- Landscape and townscape
- Natural resources
- Climate change
- Biodiversity
- Historic environment
- Economic development
- Rural economy
- Town centres
- Efficient travel

The appraisal tests whether a site or policy option will have a positive or negative on these objectives and whether the effect is significant or not.

The Strategic Housing and Economic Land Availability Assessment tests the amount of deliverable and developable land for development within the District and whether there is sufficient land to meet objectively assessed needs. In doing so, it is necessary to test the suitability, availability and achievability of all site options. Only sites which are suitable, available and achievable can be included for allocation in the Local Plan. However, just because a site is considered to be suitable, available and achievable in this
assessment, it doesn’t necessarily translate that it would be appropriate to allocate it in the Local Plan as there could be other planning reasons why the site would not be allocated (such as sufficient more favourable land elsewhere).

For each site considered a conclusion is also presented which takes into account the consultation responses and site assessments. The conclusions detail the reasons why a site has been identified in the Local Plan or not.

**Lowestoft Area**

**Broad Area for Development – Potential Development Area south of Lowestoft**

Suggested Use: Housing, Employment, and associated community infrastructure and sports and recreation facilities.

Site Area: Approximately 300 hectares

This is a large swathe of land covering most of the farmland to the south of Lowestoft and Carlton Colville. The site is proposed as a potential area for a large development encompassing a link road between the A12 and the A146.
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, and an ‘Amber’ impact on the foul sewerage network. Full details are on the Council’s website.

The Environment Agency stated that they would consider this area as generally appropriate for development. They noted that Pakefield landfill within this area is now closed. They also noted that the area does fall within a Drinking Water Protection Area, although the area is also largely underlined by a principle aquifer, but this will not generally restrict the majority of development. The Environment Agency noted that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They suggested that development of this area could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy.

Suffolk County Council stated that in general the proposed scale of development justifies a new link road although it is not clear if the new road would reduce traffic elsewhere on the network. The County Council is supportive of the link road in principal, assuming that the cost of the link and all other infrastructure, such as schools and open space, is funded through the development.

Carlton Colville Town Council stated that they didn’t think the whole area was appropriate for development. They stated that LOW11 (Oakes farm on the western part of the area) has already been agreed. They added that development on any of the rest of this area will completely envelop Carlton Colville and remove the semi rural character of the area. They stated that flooding will increase as the drains are already inadequate and many natural soakaways have already been built on. They stated that Carlton Colville has already grown to a size equivalent of a new settlement and should not be made any bigger. The Town Council suggested that Waveney should look for a new settlement elsewhere near Halesworth for example. They added that Carlton Colville has already outgrown its infrastructure, as there were insufficient doctors, dentists and medical provisions, no post office, no youth club and no provision for adult education classes. They suggested that if some areas have to be built on then housing south of The Dales would be less intrusive.

Gisleham Parish Council stated that that rather than concentrate the development in a southern swathe the town should develop with a natural even spread. They raised concern that the land is grade 1 or grade 2 agricultural quality. They noted that the road link will only direct traffic away from Lowestoft town centre which is already struggling. They added that development to the north of the town may likely support the town centre better. The Parish Council argued that green spaces should be provided in accordance with current legislation. They suggested that brownfield sites should be a priority for development and should accommodate flats and sheltered housing. They added that the housing needs associated with the renewable energy industry could be accommodated by caravan style accommodation given the temporary nature of the jobs.

Oulton Parish Council considered that the area was appropriate for development. They suggested that the link road would make the area a possibility for development. They noted that there would be easy access...
out towards Ipswich on the A12 and Norwich on the A146 which would make this a desirable place to live for people working in these areas. They raised concern that development would add to existing traffic pressure in Lowestoft and Oulton Broad but if any permission for this large scale development was given with a proviso for a major contribution to road infrastructure, i.e. the third crossing, it would be more acceptable.

Badger Building supported the possibility of development of land south of the town, along with the possibility of improved highway connectivity from the A12 to the A146 which would reduce local congestion. They added that area is particularly well related to the opportunities for employment growth at Ellough. They noted that the area has no especially outstanding characteristics and such a proposal if carefully planned and executed could bring measurable benefits to the town.

Savills on behalf of the landowners of this area stated that the proposal would allow development to take place in an area where there are significant future job opportunities and where there is considerable local service and facilities infrastructure, which can be improved accordingly. They stated that with the provision of the third crossing development to the south of Lowestoft will be more practical and sustainable, as the area will be better connected to Great Yarmouth to the north, which is seen as a key employment growth area. They added that with the Sizewell C development and the potential duelling of the A12 between Lowestoft and Ipswich a relief road in this location could help improve connections with Norwich and the A12. Savills added that the land currently comprises mostly poor quality arable land and benefits from a relatively level topography. They noted that it would be easily serviceable and would be accessible from various different locations. They concluded that the site offers an opportunity to develop a well landscaped, predominantly residential development within a close vicinity of central Lowestoft and adjacent to the South Lowestoft Enterprise Zone. They added that the development would also involve significant opportunities in relation to leisure and community facilities and infrastructure improvements.

Members of the Public were split evenly as to whether this would be an appropriate area for development.

Those who considered that the area was not appropriate raised concerns the proposal would lead to urban sprawl and coalescence with the nearby settlements of Gisleham, Kessingland and Mutford. Concern was raised about the loss of high grade farmland and impact on local flooding issues. Concern was also raised about the impact of traffic on the A146 and the possibility of the relief road diverting traffic away from the town centre. More generally, concern was raised about the capacity of local infrastructure such as healthcare and schools to accommodate the scale of development proposed. It was suggested that it would be preferable to build on brownfield sites and on sites to the North of Lowestoft where there were better connections to the town centre and north to Great Yarmouth.

Those who considered the area was suitable for development noted it was a logical area for new development and was of a scale to deliver new community facilities. It was noted that the development would link well to planned leisure provision to the west of the area and other existing facilities in the built up area. It was noted that the relief road would link well to the third crossing and provide good access to Norwich. It was suggested that the area could be developed as a new settlement with a distinct sense of community. It was noted that a strategic gap should be maintained between the development and the
villages of Mutford and Barnby. It was suggested that new development should be supported by a firm plan for public transport provision.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

A number of issues were identified with respect to this broad area. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access to the broad area would be dependent on the delivery of a link road from the A12 to the A146. Development of this scale is also likely to have an impact on local roads, particularly the Bloodmoor Roundabout where congestion can be an issue.

The site is likely to be attractive to the market, although it is unlikely that the local market could deliver the full quantum of 2000 homes in this plan period.

Although the sensitivity of the landscape in this area is low, the scale of development proposed will create an impact. Significant amounts of landscaping will be required to mitigate this effect.

There are various natural features on the site which will need to be retained within the development. The site is in close proximity to Broads SAC and SPA and the Benacre to Easton Bavents SPA off Kessingland Beach. The scale of this development may increase recreational pressure on these protected areas. Significant alternative recreational areas will need to be provided as part of the development to mitigate this potential impact.

Parts of the site have significant potential for archaeology. Any planning application would need to be accompanied 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 of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect on natural resources as the development of the area would result in a significant loss of grade 1 and 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape.

A significant positive effect on health and wellbeing was identified in relation to the sports and recreation facilities which would be provided. Minor positive effects were identified in relation to improving education through the provision of a primary school, access to facilities, reducing deprivation, meeting housing need and supporting economic growth.

An uncertain effect was identified in relation to biodiversity. South Lowestoft has good access to the Broads SAC and SPA and the Benacre to Easton Bavents SPA off Kessingland Beach. There is potential that significant development in south Lowestoft could increase recreational pressure on these protected sites.
An uncertain effect was also identified with respect to the potential impact of development on the setting of the Grade I listed Gisleham Church.

In terms of mitigation the appraisal stated that existing natural features on the site should be retained and enhanced. Appropriate space should be created between any new development and Gisleham village and the church to mitigate impacts and require archaeological investigation to mitigate impacts on the historic environment. If there is a potential recreational impact on European protected sites it will be necessary to ensure an appropriate amount of suitable alternative recreational space is provided.

**Conclusion**

Whilst development of this area could provide a relatively sustainable option for the future growth of the built-up area of Lowestoft, it is considered there are significant risks with respect to its deliverability. Suffolk County Council made clear in their consultation response that the link road between the A12 and the A146 would need to be funded by the development. Whilst there is no evidence at present to suggest this would not be viable, there is a significant risk that the development would not be able to fund the construction of the road as well as the other community infrastructure necessary to support the development.

Such a scheme would also be a longer term aspiration and would not likely deliver the full capacity of 2,000 homes within the plan period to 2036. There is a significant need to housing in the early parts of the plan period and with limited options in the North of Lowestoft to provide short-term delivery, the allocation of this site could result in a shortfall in delivery in the early part of the plan period.

The site is also in the ownership of numerous landowners who would all need to work collaboratively to ensure the development is a success. With such a largeumber of landowners involved there is a risk, that any consortium of landowners could breakdown, undermining delivery.

Whilst initial transport modelling detailed in the Waveney Local Plan Suffolk County Transport Model Forecast Model Report (2017) identifies a positive benefit on congestion from the link road, it is not a significant impact and there is likely to still be congestion at Bloodmoor Roundabout.

Having such a significant development to the south of Lowestoft could also increase risks of impacts on nearby European protected habitats at Benacre and Carlton Marshes. Much of the land is also high grade agricultural land.

For the reasons above, the broad area for growth is not considered suitable for allocation as part of this Local Plan.
Site 3 - Ashfield Stables, Hall Lane, Oulton, Lowestoft

Suggested Use: Housing and Tourist Uses
Site Area: 0.93

This is a small site north of Camps Heath currently used as a paddock with stables.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
No comments were received from members of the public.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**
The site is accessed from Hall Lane, which is a narrow carriageway in this location in open countryside. There is no pedestrian access to the site without substantial improvements which would unlikely 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 and the sensitivity of the landscape due to the area being within a tributary valley farmland character area.

There is archaeological potential and a possible gas main running under 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 included the lack of accessibility and impact on the landscape.

Minor social and economic positive effects related to the provision of housing and tourist accommodation.

**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 in this Local Plan.
Site 4 - Blundeston Road (west end), Corton, Lowestoft

Suggested Use: Housing
Site Area: 1.59

This site is currently used as paddocks.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets.
Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amer/Green’ impact. Full details can be found on the Council’s website.

Members of the Public who responded objected to this site. Concern was raised about the loss of farmland, flooding and impact on wildlife. It was suggested that this site is planted as a woodland area to make wildlife habitation.
More generally, concern was raised that further development would make Blundeston like Carlton Colville. Concern was raised that The Street in Blundeston was already congested with parked cars and further development would make it worse. It was suggested that the development of the former prison site was sufficient for Blundeston. It was suggested that if development does go ahead only with materials in keeping with the local area should be used. Concern was also raised on the impact on local infrastructure.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints which could not be mitigated. The main issue identified by the assessment is impact on the landscape. The site is within tributary farmland landscape character area. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value and low capacity for development. However, this site is well contained within the landscape and does not exhibit some of the qualities identified for the wider character area in the Sensitivity Study. The site is rural in character. The site does not relate well to the existing settlement. Impact would be lessened if developed in conjunction with site 165. The site does not relate well to the existing settlement. These impacts could be lessened if developed as part of a more strategic development with its own identify with site 165 which surrounds it.

The site has some archaeological potential.

The site has capacity for 45 dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identifies a significant negative effect on the conservation of natural resources as the site is grade 2 agricultural land. Minor negative effects included the lack of accessibility to employment and impact on the landscape.

Minor social and economic positive effects related to the provision of housing.

In terms of mitigation measures, the appraisal suggested retaining the northern boundary hedgerow and trees to integrate the site into the surrounding countryside.

Conclusion
Considered as part of a wider allocation with sites 165 and 166, the site provides a sustainable location for future housing growth. Out of the all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.
Site 7 - Burnt Hill Lane to Marsh Lane, Carlton Colville

Suggested Use: Housing
Site Area: 31.81

This large site is currently used mainly for agriculture. Parts of the southern part of the site are used as paddocks.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crossed part of the site. Full details are on the Council’s website.

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

The Environment Agency noted that the site is partly in flood zone 3.
Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.

North Cove Parish Council stated that the development of the site would have a severe impact on Carlton Nature Reserve, green infrastructure and an important landscape area. They also raised concern about visual impact effect on the nature reserve including run-off and light pollution.

Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat’s Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that large part of these sites is owned and managed by Suffolk Wildlife Trust as part of our Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

More generally concern was raised about the impact on heath and education services. It was also suggested that brownfield sites should be considered first. One respondent considered that Lowestoft was large enough already and development should be located within its existing borders.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main issue identified is the impact on the landscape. The site is within tributary valley farmland and rural river valleys character areas. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a low sensitivity, a moderate value and low capacity for development. This is mainly due to major contribution the landscape area makes to the setting of the Broads. The site is rural in character. The site is highly exposed to the north and east. Large parts of the site are exposed and highly visible from The Broads. Development on Beccles Road at present has an impact on The Broads and further encroachment on this site towards The Broads would likely have a significant impact which could not be mitigated. As such the site is not considered suitable for development.

There are potential impacts on the transport and foul sewerage networks given the scale of the site.
There is potential for archaeology on the site.

There is a potential noise impact from the adjacent railway line.

This site is not considered to be suitable for development.

*Summary of Draft Sustainability Appraisal*

The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the setting of the Broads. Minor negative effects included lack of accessibility to employment and loss of greenfield land.

Minor positive effects identified relate to the provision of housing and accessibility to services and facilities.

*Conclusion*

Due to the impact on the setting of the Broads, the site is not considered suitable for allocation in this Local Plan.
Site 17 - Former Lothingland Hospital, Union Lane, Oulton

Suggested Use: Housing
Site Area: 3.90

This site was the former site of the Lothingland Hospital. Some parts of the site are being used as a builder’s yard with other parts overgrown and unused.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England noted that the site was in close proximity of The Lodge and The Hall, both grade II listed to the east and ruins of Church of St Andrew also grade II to the west. They stated that development could have a potential impact on the setting of the listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red’ impact. Full details can be found on the Council’s website.
Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

One respondent stated that housing on the site would require additional medical facilities.

**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 assessment noted that access to the site was difficult from Union Lane. This constraint could be overcome from accessing the site from site 84 to the east or other sites in the vicinity as part of a more strategic development.

The assessment identified a risk of contamination from the large amounts of dumped material and storage of machinery on the site.

Improvements to the foul sewerage network will be needed to accommodate development.

The site has some archaeological potential and part of the site is a historic burial ground which will need to be avoided.

The site has a capacity for 60 dwellings.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to the loss of greenfield land.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

**Conclusion**

In isolation the site is not considered suitable for allocation in this Local Plan due to the poor road access from Union Lane. However, combined with Site 84 to the east, the site is considered suitable and is allocated under Policy WLP2.13 of the Local Plan.

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. Development of the site will help improve the appearance of the former Lothingland Hospital site which is currently being used informally for the storage of building materials and equipment.
Policy WLP2.13 addresses concerns raised by Suffolk County Council Archaeology by requiring development to avoid the historic burial ground to the north west of the site. It is not considered that the development of this site will have an impact on the setting of any listed building.
Site 18 - Glebe Farm plus adjoining land, Church Avenue, Oulton

Suggested Use: Housing
Site Area: 1.08

This site comprises a dwelling, garden land and a paddock.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /‘Green’ impact. Full details can be found on the Council’s website.
The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England stated that the site is in close proximity to the Church of St Michael, a grade I listed building. They stated there may be potential for impact on the setting of the high grade listed building although it maybe screened by The Spinney.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

A member of the public stated that any development on the site would have to be carefully landscaped. They stated the area has certain charm and it could easily be spoilt. More generally they added that development would probably add to the strain on services such as local health facilities.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The main issue identified in the assessment is the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is quite exposed to views from the west and the Broads. The site is very rural in character and housing development would be out of character. Given the impact on the setting of the Broads, the site is not considered suitable for development.

Access to the site is potentially an issue as Church Avenue which is unmade track and is unlikely to be suitable to accommodate additional development. If site 53 is developed this could provide a solution and the landowner has confirmed access would be available from site 53.

Foul sewerage improvements would also be needed to accommodate development.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the setting of the Broads. Minor negative effects included the loss of greenfield land.

Minor positive effects identified relate to the provision of housing and accessibility to employment premises.
Conclusion

The site would form an unnatural extension to the built up area and would likely have a significant impact on the landscape and the setting of the Broads. Therefore the site is not considered suitable for development.
Site 21 - Hall Road, Carlton Colville

Suggested Use: Housing
Site Area: 3.99

This site between the community centre and the ‘Four Acres’ development is currently vacant.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England note there could be potential impact on the setting of a moated site scheduled monument to the east.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.
Suffolk Wildlife Trust stated that based on aerial photographs the site may contain habitats of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

The landowner considered that the site was one of the most suitable sites put forward in the Lowestoft area. They stated that the site was well related to the existing settlement in close proximity to services and facilities. They added that public transport is within walking distance. They stated that information provided by Durrants suggest the land is Grade 2 agricultural land rather than Grade 1 as shown on the national map. They added the site has not been in agricultural use for over 10 years and therefore development would not involve the loss of agricultural production. They consider that the site is both available and achievable as the landowner supports development and Carlton Colville is a highly popular location in terms of the market. They suggest that the site will make a valuable contribution to the Council's housing targets.

Members of the Public raised concern about surface water drainage. They raised concern that drainage would need to flow into the southern end of the Kirkley Stream which has been subject to regular flooding. They also raised concern about foul drainage and whether the local pumping station would be capable to accepting additional flows. Concern was raised that Hall Road was narrow and congested at school times and extra traffic and extra school children would make the situation worse. More generally it was considered that Carlton Colville had already had too much development.

**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 identified in the assessment was the risk of surface water flooding. Approximately half of the site suffers from surface water flooding which could mean that drainage is an issue requiring land to be set aside for sustainable drainage solutions.

The other main issue is the impact on the local roads network which are already under pressure from traffic at school times.

The site also has high archaeological potential and foul sewerage improvements would be needed to accommodate development.

The site has a capacity for 120 dwellings.

**Summary of Draft Sustainability Appraisal**

The draft sustainability appraisal identified a significant negative effect on the objective to conserve natural resources as the site is on high grade agricultural land (grade 1). A minor negative effect is the risk of flooding.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.
Conclusion
There are currently significant issues with traffic movements associated with Carlton Colville Primary School which would be difficult to mitigate through the development of this site in isolation. The site is not of a scale to deliver any on-site infrastructure improvements.

The site is considered less favourably to the site allocated under Policy WLP2.15 of the First Draft Local Plan and the other preferred sites in Lowestoft for residential development. 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.
**Site 22 - Hammonds Farm, London Road, Gisleham, Lowestoft**

Suggested Use: Housing and/or Caravan Park  
Site Area: 4.10

This land is just south of Beach Farm Residential and Holiday Park in Pakefield and is currently used for agriculture.

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.
Suffolk Wildlife Trust stated that the site, based on aerial photographs, may contain habitats and species of conservation value. They stated that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that the site has.

Martin and Lawrence Tegerdine supported the development of the site and consider that it represents a sustainable and deliverable site, and in conjunction with site 147 is capable of accommodating a significant quantum of the planned growth for Lowestoft. They stated that the development would represent a logical extension to the town. They stated that the site is well served by public transport from services between Lowestoft and Kessingland and is located close to schools, retail units and employment.

Wellington Construction on behalf of the landowner noted that part of the site is brownfield and there is room to include additional strategic landscaping and open space. They noted that the site was adjacent to both residential and holiday accommodation and could be built out as a stand-alone site without impacting on the landscape of the area. They noted the potential to combine the development with sites 147 and 98. They noted that there are no viability issues with this site and development could be delivered relatively swiftly.

One member of the public supported the development of this site and stated that it should provide affordable rented 2-3 bed houses. They noted that the site was close to schools, shops, on a main bus route, and close to the beach.

One member of the public stated that it is crucial to keep the buffer between Lowestoft and Kessingland and another stated that there has been too much development in this area already and any more will exceed the ability to provide services and viable communications.

**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 issues identified in the draft assessment were potential access constraints from the A12 and the potential impact on the road network.

Foul sewerage improvements would also be necessary to accommodate development.

There is some potential for biodiversity on the site.

There is potential for contamination on site.

The site has some archaeological potential.

The site has a capacity for 117 dwellings.
Summary of Draft Sustainability Appraisal
The Draft Sustainability Appraisal considered two separate uses for the site, housing and tourist accommodation.

For housing and tourism uses the appraisal identified minor negative effects on natural resources.

For housing, minor positive effects were identified in relation to encouraging efficient patterns of movement and provision of housing.

For tourism minor positive effects were identified in relation to reducing deprivation and economic growth.

In terms of mitigation measures, the appraisal identified that a wildlife survey will be needed to assess whether there are any protected species on the site. Open space could be provided on the site to address the lack of accessibility to existing open space.

Conclusion
The site does not have a particularly good relationship to existing residential areas and sits within an area characterised by out-of-centre retail and tourism uses. The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

Considering the above, 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.
Site 23 - Holly Farm, Wood Lane, Oulton, Lowestoft

Suggested Use: Housing and Tourist Accommodation
Site Area: 1.66

This site is to the west of Oulton and north of Camps Heath in open countryside on the edge of the Broads.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be
allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The site is accessed from Wood Lane, which is a narrow, unmade track 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.

A further issue identified in the assessment was the impact on the landscape. Development of this site for housing is likely to have a significant impact on the landscape and the setting of the Broads. As such the site is not considered suitable for development.

Improvements would need to be made to the foul sewerage network if this site was developed.

Other issues identified included the potential for contamination on the site.

There is also the potential for archaeology.

This site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identifies a significant negative effect on the landscape due to the impact on the landscape and the setting of the Broads. Minor negative effects included access to services and facilities.

Minor positive effects were identified in relation to housing provision, the tourist accommodation use on reducing deprivation, and supporting economic growth and the rural economy.

Conclusion
Due to the lack of safe pedestrian access to the site and impact on the landscape and on the setting of the Broads, the site is not considered suitable for allocation.
Site 33 - Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft

Suggested Use: Housing
Site Area: 0.72

This site sits to the south of Tesco off Leisure Way in north Lowestoft. A previous planning permission on the site for an 80 bed care home has recently expired.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /‘Green’ impact. Full details can be found on the Council’s website.

The Gunton Woodland Community Project stated that the site is not suitable for a dense housing development. They stated that the site forms a critical link in the “green belt” surrounding North Lowestoft that stretches from the beach all the way through the Denes, Dip Farm golf course, Gunton Wood, Pleasurewood Hills meadow, Gunton Meadow Nature Reserve to Foxburrow Wood and thence to
the West of the A12. They added that immediately adjacent to Site 33, there is a large natural pond which is well known as a great-crested newt habitat. They noted that Gunton Meadow Nature Reserve is an important asset to the area with its wide variation of habitat, two ponds, interesting ground flora and a great deal of bird life. They stated that the outcome for Site 33 would be to incorporate it as a part of the Reserve. They suggested one way forward could be to create an “adventure playground” attraction for children based on outdoor activities with parking and a small café with the possibility of planting a significant number of trees to preserve its green credentials.

Suffolk Wildlife Trust noted that a number of ecological issues have arisen as the result of site clearance that has previously occurred in relation to now expired planning consent for a care home. They added that Gunton Meadow is part of a network of small wildlife rich habitats in north Lowestoft which form an important ecological network in the area. They stated that whilst it is understood that some form of development has previously been considered acceptable on this site, they do not consider that residential development of the density identified in the Local Plan consultation is appropriate. They stated that preferably the site should not be allocated for any built development. However, if it is determined that some form residential development is deliverable it must be ensured that it is of low density and includes substantial buffers of both the nature reserve to the east and the green space to the south.

The landowner commented that the site is conveniently located in north Lowestoft, 2 miles from the town centre and close bus stops and cycle routes providing access to services and facilities. They stated that the site is within 2.4 miles of a railway station. They added that the principle of development has already been established through the previous care home consent on the site. They noted the site is within flood zone 1 and not considered at risk from surface water flooding. They noted that the site contains no known heritage assets, ecological designations or other physical constraints that would prevent development. They added there is an existing gas main on the site and a Tree Preservation Order (TPO). They stated that any development on the site could be adequately designed around the gas main and TPO. Frostdrive also provided more detailed comments on the initial Sustainability Appraisal and raised concern about the Council’s conclusions on landscape and townscape impact, natural resources impact, climate change impact and efficient movement impact.

One member of the public objected to the development of the site for houses. They stated that the site adjoins the Gunton Meadow Nature Reserve and a pond which has been a breeding ground for great crested newts. They added that the site has an oak tree on it which should be protected.

**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 identified is impact on the landscape and townscape. The site has a poor relationship with existing residential areas and housing development on the site would be out of character with the surrounding leisure and retail uses. This could be mitigated by screening and retention of existing planting and establishing pedestrian and cycle connections with the residential area to the south.

The foul sewerage network would have to be improved if the site was developed and a gas main runs under the site which would have to be accommodated for.
The site has capacity for 21 homes.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to landscape and townscape impact and natural resources impact and poor accessibility to employment areas.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Mitigation measure identified by the assessment related to the impact on the landscape. The site would need to be well screened, including retaining existing planting. Opportunities to provide pedestrian and cycle connections into the surrounding residential areas to the south would need to be explored.

**Conclusion**

The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of this Local Plan.
Site 34 - Land at Bell Farm, Carlton Colville (primary area)

Suggested Use: Housing
Site Area: 5.00

This site sits to the south of Carlton Colville and is accessed by Shaw Avenue which connects to the Street. The site is currently in agricultural use.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They stated that the development of this site could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. They added that the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities.
Historic England commented that there is potential for the development of the site to impact on the setting of a nearby Moated Site Scheduled Monument to west.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Suffolk Wildlife Trust stated that based on aerial photographs the site may contain habitats of conservation value. They considered that the site should not be allocated unless for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.

The landowner stated that the site is considered to be suitable, available and deliverable in the next 1-5 years. They suggested the site is accessible via Low Farm Drive, and there is also potential to create an access from The Street, through Site 35 to Site 34. They stated that development would represent a logical extension to the south of Carlton Colville being abutted by development to the north and the east. They stated that the site is within cycling and walking distance from Lowestoft, a key area for prospective employment growth over the coming plan period.

The majority of members of public who responded opposed development of the site. Concern was raised that development could create flooding problems from the Kirkley Stream. Members of the public noted issues about access on to The Street where parking is already a problem. Concern was raised about the loss of agricultural land. More generally concern was raised that there had already been too much development in Carlton Colville and it was questioned whether the local schools and other services and facilities could cope.

One member of the public stated they thought the site was suitable land for development.

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 most significant issue identified is the potential for archaeological remains on the site. Any future planning application would need to be accompanied 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. As such there is a risk that the development potential of the site could be reduced.

A right of way runs through the site. Foul sewerage improvements would be needed with development and it is possible that underground electricity cables run under the site.

The site has capacity for 130 dwellings.
Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

Mitigation measure identified by the assessment related to the need for an archaeological investigation.

Conclusion

Policy WLP2.15 of the Local Plan allocates this site as part of a larger allocation for 800 new homes, a primary school, country park, allotments, flood mitigation, play space, local shops, and a community centre. The allocation also includes a car park for the community centre as existing Carlton Colville Primary School.

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.

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 Ullswater development. The development of 800 homes on this site provides an opportunity to provide funding and land for this development.

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 indicative masterplan provided with Policy WLP2.15 addresses concerns raised by Historic England by showing open space around the Moated Site Scheduled Monument. The policy requires an archaeological investigation to take place prior to planning permission being granted.

Concerns raised about flooding are noted, and the indicative masterplan provided with Policy WLP2.15, shows open space in the area of flood risk on the site. Furthermore, the Policy requires the provision of flood mitigation works in line with the Lowestoft Strategic Flood Risk Management Project. These works could reduce the existing risk of flooding downstream on the Kirley Stream.

Detailed access issues will need to be addressed as part of a planning application. There may be potential within the site to provide additional parking for users of The Street to avoid parking on the road. The site is
on high grade agricultural land, however, most sites in and around Lowestoft are on high grade agricultural land.

In response to concerns raised by members of the public about infrastructure, the site will provide a new primary school which will take pressure of the existing primary school and reduce traffic impacts associated with the existing primary school. The site will also provide new open space, local shops and a community centre. Development contributions will be made towards extensions to Rosedale Surgery, improvements to junctions such as Bloodmoor Roundabout and improvements to the cycle network.
**Site 35 - Land at Bell Farm, Carlton Colville (secondary area)**

Suggested Use: Housing  
Site Area: 13.38

This large site is south of the Street Carlton Colville and is currently in agricultural use.

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council’s website.

The Environment Agency stated that Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. They stated that the development of this site could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. They added that the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities.
Historic England commented that there is potential for the development of the site to impact on the setting of a nearby Moated Site Scheduled Monument to west.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Members of public who responded opposed development of the site. Concern was raised that development could create flooding problems from the Kirkley Stream. Concern was raised about the loss of agricultural land. More generally concern was raised that there had already been too much development in Carlton Colville and it was questioned whether the local schools and other services and facilities could cope.

**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 most significant issue identified is the potential for archaeological remains on the site. Any future planning application would need to be accompanied 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. As such there is a risk that the development potential of the site could be reduced.

There is a risk from surface water flooding on the site, although as noted by the Environment Agency there is potential for mitigation works to reduce the risk of flooding in the area through the development of the site.

Access to the site could be an issue from The Street due to poor visibility. However, access could also be achieved through site 34. There is also potential for local traffic impacts on The Street and at Bloodmoor Roundabout, given the scale of development which could be accommodated on this site.

There is a sewer pipe crossing the site and improvements to the foul sewerage network would be necessary for development.

The site has capacity for 320 dwellings.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact and the impact of climate change, specifically flooding.

Minor positive effects were identified in relation to the provision of housing in an accessible location which will help encourage healthy lifestyles.

An uncertain effect was identified with respect to biodiversity, as there are some natural features on the site.
Mitigation measure identified by the assessment related to the need for an archaeological investigation and the retention of natural features.

**Conclusion**

Policy WLP2.15 of the Local Plan allocates this site as part of a larger allocation for 800 new homes, a primary school, country park, allotments, flood mitigation, play space, local shops, and a community centre. The allocation also includes a car park for the community centre as existing Carlton Colville Primary School.

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.

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 Ullswater development. The development of 800 homes on this site provides an opportunity to provide funding and land for this development.

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 indicative masterplan provided with Policy WLP2.15 addresses concerns raised by Historic England by showing open space around the Moated Site Scheduled Monument. The policy requires an archaeological investigation to take place prior to planning permission being granted.

Concerns raised about flooding are noted, and the indicative masterplan provided with Policy WLP2.15, shows open space in the area of flood risk on the site. Furthermore, the Policy requires the provision of flood mitigation works in line with the Lowestoft Strategic Flood Risk Management Project. These works could reduce the existing risk of flooding downstream on the Kirkley Stream.

Detailed access issues will need to be addressed as part of a planning application. There may be potential within the site to provide additional parking for users of The Street to avoid parking on the road. The site is on high grade agricultural land, however, most sites in and around Lowestoft are on high grade agricultural land.

In response to concerns raised by members of the public about infrastructure, the site will provide a new primary school which will take pressure of the existing primary school and reduce traffic impacts associated with the existing primary school. The site will also provide new open space, local shops and a
community centre. Development contributions will be made towards extensions to Rosedale Surgery, improvements to junctions such as Bloodmoor Roundabout and improvements to the cycle network.
Site 40 - Land at Laurel Farm, Hall Lane, Oulton

Suggested Use: Housing
Site Area: 2.74

This site is to the west of Oulton on Hall Lane. It is currently used as paddocks and some holiday accommodation.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /‘Green’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
Badger Building stated that the site could be brought forward for development within the early years of the plan. They stated that the site is well located in relation to existing built development and can proceed without reliance on others. They stated that the site relates well to the development to the south, presently under construction by Persimmon.

**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 that at present there is no pedestrian access to the site. This should change with the completion of the adjacent Woods Meadow development.

Other issues include the lack of relationship with the existing built up area. This will change with the completion of the Woods Meadow development.

Foul sewerage improvements have also been identified.

The site has capacity for 80 homes.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to natural resources impact.

Minor positive effects were identified in relation to the provision of housing in a potentially accessible location which will help encourage healthy lifestyles.

An uncertain effect was identified with respect to biodiversity, as there are some natural features on the site.

A mitigation measure identified by the assessment related to the need to provide a lit footpath to the village of Oulton which would improve accessibility to services and facilities and help promote healthy lifestyles. The assessment also identified the need for the retention of natural features.

**Conclusion**

The site currently has a poor relationship to the existing built-up area of Lowestoft. At present there is no pedestrian access to the site. This should change with the completion of the adjacent Woods Meadow development. However, completion of this development is not expected until 2028. As such at the present time this 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.
Site 51 - Land at The Old Rectory, Church Lane, Oulton

Suggested Use: Housing
Site Area: 2.09

This site is part of the grounds of the Old Rectory and is currently an open meadow.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council’s website.

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red’ impact based on historic landscape grounds. Full details can be found on the Council’s website. It should be noted...
that further correspondence received suggests there is less likely to be potential for archaeology on the site.

The Environment Agency stated that the site is within Source Protection Zone 3.

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 maybe screened by The Spinney.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

The landowner raised a number of points in support of development on the site. The landowner stated that the site had good access to services and facilities and employment, including the Mobbs Way Enterprise Zone which would help contribute to healthy communities. They stated that the site would help meet the District’s housing needs and was available, suitable and achievable in line with the National Planning Policy Framework. They stated the site would contribute towards air quality and would minimise impacts on climate change as it is an accessible site which would discourage travel by car. They also mentioned there would be no impact on water quality as there is capacity in the sewerage network. They suggested that the impact on the landscape would be limited as the existing trees would screen the development. In terms of natural resources it was stated that the land is low quality grassland which is too small to be economically viable for use as a small holding. It was stated that there was no flood risk on the site. They stated that the intention was to develop the site without loss or removal of any significant trees or woodland. It was stated that a local developer has already committed to the early development of the site and that the development will create jobs in the construction phase.

A member of the public commented that the land is suitable for development and has pretty good transport links and facilities. They noted that the local school should take more pupils from local area rather than half way across town.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main issues identified in the assessment are the impact on the landscape and heritage. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads. Large parts of the site are wooded which contributes significantly to the local landscape and the setting of the Broads. Approximately half of the area is open meadow secluded by trees. The site has a poor relationship to the existing settlement.
Comments from Suffolk County Council Archaeology suggest the site has historic landscape value as a planned garden associated with the rectory. It has been indicated by the landowner that this part of the site (to the east of the Rectory) would not be developed. The Settlement Fringe Study concludes there is historic continuity of the wider landscape with significant heritage features.

The Old Rectory and grounds are a non-designated heritage asset that could qualify as a locally listed building. The rectory is typical of other country houses of its period in that it has a pastoral setting outside its own garden area that is intrinsic to its setting. It is judged that this is a very important component of the Rectory’s setting. Regardless of the very good level of tree screening that exists development would be harmful to its heritage significance. It is unlikely that this impact could be mitigated.

Another issue identified was with respect to access as the current access is from a narrow drive which is unlikely to be suitable for a level of development which could be accommodated on this site at standard densities.

There is some risk from surface water flooding and some potential for archaeology. The woodland on the site could provide a habitat for wildlife.

The site has capacity for 9 houses.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies that the site would have a significant negative effect on the landscape for the reasons described above. Minor negative effects were identified with respect to the conservation of natural resources, the impacts of climate change and the historic environment.

Minor positive effects were identified with respect to providing housing in an accessible location.

An uncertain minor negative effect was identified with respect to impact on biodiversity.

In terms of mitigation the appraisal identified that low density development on the meadow area only and preserving the trees and woodland would mitigate some of the landscape impacts. It is not considered possible to mitigate the historic environment effects.

Conclusion

This site has a poor relationship with the existing built up area and any development on the site would be out of character of the area. The land may not benefit from any statutory designation but it clearly has some landscape and historic value. Due to the poor relationship to the existing built up area where development would result in an unnatural extension to the existing settlement, together with the effects on the setting of a non-designated heritage asset, the site is not considered preferable for allocation compared to other options available within and around Lowestoft. The preferred sites identified in the First Draft Local Plan 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.
Site 53 - Land between Church Lane and Church Avenue, Oulton

Suggested Use: Housing
Site Area: 2.38

This site is currently used as paddocks and lies to the west of Oulton between Church Lane and Church Avenue.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs though the site. Full details are on the Council’s website.

The Broads Authority stated that there are existing pressures on Oulton Broad marshes relating to land use. They added that additional housing may add to these pressures as well on the marshes as a recreational resource.

The Environment Agency stated that the site is within Source Protection Zone 3.
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 maybe screened by The Spinney.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Green’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

The landowner stated that the site is adjacent the built up area in walking distance of a primary school, a shop and public transport facilities. They noted that once the Woods Meadow site is established Site 53 will be reasonably close to additional retail facilities, a community hall, medical centre, primary school, play areas and a country park; together with further public transport facilities. The landowner raised concern about the initial Sustainability Appraisal conducted by the Council and argued that the western boundary of the Whiting estate does not perform a natural edge to the built for. In support of this they argued that there was development to the north and south of the area. However, they acknowledged that the surroundings to the immediate west are semi- rural and therefore a lower density development may be more appropriate. The landowners outlined the potential for the site to deliver highway improvements to a concealed junction where Church Lane and Sands Lane converge. The landowners stated that the site could help meet the District’s housing need and there are no viability issues and therefore development could be delivered swiftly.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main issue identified in the assessment is the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads and the western part of the site is exposed to the Broads. The site is distinctly rural in character. Mature planting from the Whiting Road estate to Church Road provides a natural edge to the settlement. These potential impacts on the landscape are not considered to be mitigatable. As such the site is not considered suitable for development.

Other minor issues identified in the assessment include access constraints as Church Lane is quite narrow along the frontage of the site.

There is also a sewer pipe running through the site and foul sewerage improvements have been identified.

A small amount of surface water flood risk which may require space to be set aside to deal with surface water.

This site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identifies that the site would have a significant negative effect on the landscape for the reasons described above. Minor negative effects were identified with respect to the conservation of natural resources and the impacts of flooding.

Minor positive effects related to the provision of housing in an accessible location which may help promote healthy lifestyles.

Conclusion

The site would form an unnatural extension to the built up area and would likely have a significant impact on the landscape and the setting of the Broads. Therefore the site is not considered suitable for allocation in this Local Plan.
Site 54/204 - Land between Harbour Road and the west end of the old Shell site, Lowestoft

Suggested Use: Housing, employment and marina.
Site Area: 1.03/1.20

This site sits on the north side of Lake Lothing at the end of Harbour Road. It is currently unused and is overgrown.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’/‘Green’ impact. Full details can be found on the Council’s website.

Suffolk Wildlife Trust stated that, based on aerial photographs, the site may contain habitats and species of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.
Landowner has submitted the site for mixed use including employment and residential linked in with a marina on the frontage.

One respondent stated that the site includes a public footpath along the shore of Lake Lothing and a well-established but informal cycle track along the top of the bank, beside the railway line, from the footbridge over the railway to Harbour Road. They stated that in any development the route must be included as a formal cycle route.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints or impacts which could not be mitigated. However, there is uncertainty with respect to the potential contamination constraints and the potential impact biodiversity from any redevelopment which may not be able to be mitigated. The land was historically used for industry and some waste has been dumped on the site presenting a high risk for contamination. The site is very overgrown in places and likely provides a valuable wildlife resource with links to the beach to the south of the site and Lake Lothing beyond.

There are potential issue with the market attractiveness of the site, given its potential contamination issues, proximity to industry and the existing character of the land over Lake Lothing. Once the Brooke Peninsula is redeveloped, along with the pedestrian and cycle bridge this may make the area more attractive to the market. The changing character of the area would also mean that redevelopment of this site would be more in keeping with the townscape.

This site is located in flood risk zones 2 and 3. Part of the site is located in functional floodplain 3b.

There are likely to be compatibility issues with neighbouring uses. Noise and odour from adjacent industry and the railway line may cause amenity problems for new residents.

Trees and shrubs that cover part of the site could provide habitats for local wildlife. Some of this is mature vegetation which complements the townscape. This could be lost if the site is developed. The site is also vulnerable to flooding.

If the site is developable it could have a capacity for about 30 homes. This would involve developing half of the site, in order to avoid areas at risk of flooding and protect the beach. It is suggested that 50 dwellings per hectare would be an appropriate density.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects related to the impact on health, the impact on townscape, the effects of climate change and the impact on biodiversity.

Minor positive effects were identified in relation to the provision of housing in a potentially accessible location and on economic growth associated with the mixed use development.
To help mitigate the effects the Sustainability Appraisal suggested ensuring buildings are designed to limit the effects of noise. It also identified a need to avoid the southern part of the site to minimise impacts on biodiversity and impacts from flooding.

**Conclusion**

Given the uncertainty about the possible impact on biodiversity, the site should not be positively allocated for development in the Local Plan for a mixed use development. There are also concerns about the deliverability of the site due to the attractiveness of the site to the market given its surroundings. This may change with the completion of the Brooke Peninsula development and the associated pedestrian and cycle bridge.

A lack of allocation on this site will not prohibit its future development as the site will be within the settlement boundary/physical limits of Lowestoft, where the principle of development will generally be accepted subject to conformity with the other policies of the Local Plan and national planning policy.
Site 56 - Land between Rushmere Road and Fairhead Loke, Carlton Colville

Suggested Use: Housing
Site Area: 5.58

This site is just to the west of Carlton Colville Primary School. It is currently in agricultural use.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Gisleham Parish Council raised a number of concerns about development on this site as summarised below.

- The road which the site accesses from is a busy rural road with a blind bend. They noted that the road could be widened, however, this would increase traffic speeds.
- There is no footpath to the site and the difficulty of providing one.
• Rushmere Road regularly floods at times of heavy rains, close to where the site entrance might be. They noted they were not aware of any sewerage constraints.
• Carlton Colville Primary School would not cope with what could be an extra 150 or more pupils and that if it was to be extended, parking problems would increase around the school. Concern was also raised about people driving to shops on Famona Road where there is limited parking.
• The local roads would not be able to cope with the construction traffic
• An area of ‘set aside’ is located along the eastern boundary which is potentially an area for small mammals and birds and various varieties of flowering plant. They also noted bats in the locality.
• The site is some distance from development and would cause excessive light pollution.

The landowner stated the site is considered suitable, available and deliverable in the next 1-5 years. They noted that landscape issues could be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. They noted that the site could be accessed from the north via Fairhead Loke, subject to some highways improvement works, and is currently accessible via Rushmere Road to the south. They stated the site is adjacent to Carlton Colville Primary School and is situated within cycling and walking distance from Lowestoft. They added that there may be some potential synergies between the development of the site and a possible solution to the existing traffic congestion issues associated with Carlton Colville Primary School, which could involve some of our client’s further land holding to the south of the school.

One member of the public responded to this site option and raised concerns about access to the site from a narrow country road which has poor visibility and subject to parking associated with the school. They also raised concern about surface water discharging into the Kirkley Stream causing flooding. They added that the development of the site would encroach into open countryside. They also questioned whether the school could accommodate the additional children.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints or impacts which could not be mitigated. Access to the site is constrained. Access from Rushmere Road will require the footpath to be extended to the frontage of the site. Access from Fairhead Loke will also likely require improvements. There are also existing traffic congestion problems associated with the Primary School. The landowner has suggested that the development of this site could provide a solution to these issues, but there are no details of this solution to be confident it would be acceptable.

There is some potential for archaeology and any planning application would need 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. As such there is a risk that the development potential of the site could be reduced. Development on this site would also require foul sewerage network improvements.

There is potential for an impact on the landscape. This could be mitigated by planting on the western boundary of the site and reduced housing density.
The site has capacity for 110 dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the land is grade 1 agricultural land. Minor negative effects were identified in relation to impact on the landscape.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

The appraisal identified that minor negative effects on the landscape could be mitigated through adequate boundary planting on western boundary of the site to integrate the development into the countryside and replicate the existing low impact edge of the settlement to the east. The appraisal states that a lower residential development would be more appropriate on this site.

**Conclusion**

The site has a poor relationship to the existing built-up area and development would form an unnatural extension to the town. The site currently has no pedestrian access to the site. The site is on grade 1 agricultural land. Considering the above, 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 high grade agricultural land. As such the site is not considered suitable for allocation in this Local Plan.
Site 70/180 - Land north of Hall Lane, Oulton

Suggested Use: Housing
Site Area: 2.30

This site is currently used for paddocks and lies to the north of Hall Lane in Oulton.

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Red’ impact on historic building/landscape grounds. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

Badger Building stated that in the event of allocation, they are in a position to bring the site forward for development within the early years of the plan. They noted that additional land to the north has been promoted but is constrained by access from Union Lane. They added that there is merit in looking at a comprehensive proposal for development in this area which can embrace the re-use of the Lothingland hospital site with a compressive scheme for access and new housing, served off Somerleyton Road.

**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 impact on the setting of the listed Manor House to the east of the site. This could be mitigated by providing open space adjacent to the Manor House boundary. The site has a 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.

Access to the site may require improvements. Using the land to the west covered by site 180 may resolve this.

Low level power lines cross the site and foul sewerage improvements have been identified.

There are small pockets of surface water flooding which may indicate a drainage issue, resulting in land being set aside to manage surface water.

There is a pond between Site 70 and 180 which could support biodiversity.

The site has capacity for 30 dwellings, given the need to have a large area of open space at the front of the site to help protect the setting of the listed building.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Grade II* Manor House. Minor negative effects identified were the impact on natural resources and flooding.

Minor positive effects related to the provision of housing in an accessible location.

To mitigate the significant effect on the historic environment the appraisal stated that leaving an area of the site adjacent to the Manor house undeveloped as open space may mitigate the impact on the setting of the listed building.
Conclusion

Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. 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 on grade 3 agricultural land. Vehicular access is possible from Hall Lane.

Concerns raised by Historic England with respect to the impact on the setting of the Manor House have been addressed in Policy WLP2.14 by requiring a significant area of open space to be provided on the southern part of the site.
Site 80 - Land off Church Lane, Carlton Colville

Suggested Use: Housing
Site Area: 3.51

This site is currently used for agriculture and is between Church Lane and Chapel Road in Carlton Colville.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England stated that there could be a potential impact on the setting of the grade II* Church of St Peter to the north east.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Carlton Colville Town Council stated that the site should be left undeveloped as it provides a green corridor and views of the church. They noted that the site is one of the highest points in Carlton Colville.
and housing there would have a detrimental affect on drains and sewers. They also noted that the church also needs a parking area and extra burial area.

Badger Building stated that in the event of allocation, they are in a position to bring each forward for development within the early years of the plan. They added that the site is well located in relation to existing built development and can proceed without reliance on others. They stated that the site provides an opportunity to draw traffic away from the tight corner by the church and provide a more direct link from Chapel Road to Church Lane. They stated that the site rounds off the extent of development of Carlton Colville, to the west and does not extend in to open countryside.

Members of the Public who responded to this site option objected to the development of the site. Concern was raised that the site is surrounded by dangerous blind corners including from Carlton Manor where there is a blind left hand bend and a blind corner at the church which has regular accidents. The access road from Carlton Hall Residential Home was noted as another hazard along with other junctions and roads in the locality. Additionally it was suggested that development would create traffic problems.

Concern was also raised about flooding. It was suggested that if the site is developed there would be a huge flooding problem as the water would run downhill from Waters Ave and Beaumont Road towards The Mardle where it was noted there had already been serious flooding problems.

Concern was raised that the development would cut off light and privacy for existing homes opposite the site. Concern was also raised that the development would lock views of the 14th Century St Peter’s Church.

It was suggested that development of this site would result in a loss of habitat for buzzards, sparrow hawks and owls which nest locally.

It was considered that the small number of houses proposed would do little to solve the housing problem.

More generally it was considered there had been too much development in Carlton Colville and the development would impact upon local infrastructure such as the school. It was suggested that if Carlton Colville needed further development, the old school could be sympathetically developed for first time buyers and or retirement bungalows.

It was suggested that small area of the site could be used for church parking.

**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 setting of the on the grade ii* listed church. This could be potentially mitigated by controlling the height and the layout of the development to ensure views (including long distance views) of the church remain. An area of open space opposite the church would help maintain a visual setting of the church from Church Lane and Chapel Road.
This site is of extremely high archaeological potential 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.

Developing this site could have an impact on views to Carlton Colville Church. A footpath runs through the site and hedgerows run along the western boundary that should be preserved. There has also been identified the need for foul sewerage network improvements.

The site has capacity for 60 homes at 20 dwellings per hectare, including 0.5 hectares set aside for open space opposite the church.

**Summary of Draft Sustainability Appraisal**

The Draft Sustainability Appraisal identified a potential significant negative effect on the historic environment due to the possible impact on the setting of the grade II* listed church. Minor negative effects were identified on the landscape and on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

To mitigate the effects on the historic environment the appraisal stated that appropriate space is set aside to protect the setting on the Grade II* listed church and ensure development is of an appropriate scale and form to preserve views of the church from the surrounding landscape.

**Conclusion**

The development of this site has the potential to negatively impact on the setting of the grade II* listed church. Whilst through the design of development this may be able to be mitigated it nevertheless detracts from the suitability of the site for allocation. The site is considered less favourably to the site allocated under Policy WLP2.15 of the First Draft Local Plan and the other preferred sites in Lowestoft for residential development. 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.
Site 84 - Land off Parkhill, Oulton, Lowestoft

Suggested Use: Housing
Site Area: 2.12

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green/Amber’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not suitable for development due to poor access and egress to road infrastructure.

Suffolk Wildlife Trust stated that, based on aerial photographs, the site may contain habitats and species of conservation value. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value.
Oldman Homes stated the site has no viability issues and therefore development could be delivered swiftly. They stated the site is adjacent to existing housing to the south and also the north east and south east on the opposite side of Parkhill. They stated the site could be developed as a standalone site or with other sites also promoted in the locality. They noted that such an approach could facilitate an improved access onto Parkhill via Site 84, thus avoiding what they regard is at present a most unsatisfactory cross road arrangement at the intersection of Union Lane, Parkhill and Oulton Rd North. Oldman Homes state that the development of the site could create an attractive entrance to the town when arriving from the north.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site is vulnerable to some surface water flooding in certain areas and foul sewerage network improvements would be needed to support development. There is also a need to extend the footpath along Park Hill by some 200m to the frontage of the site.

The site has capacity for 42 dwellings at 20 dwellings per hectare.

**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 natural resources and climate change.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

**Conclusion**

The site is allocated as part of Policy WLP2.13 of the First Draft Local Plan.

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. Development of the site will help improve the appearance of the former Lothingland Hospital site which is currently being used informally for the storage of building materials and equipment.

An ecological assessment of the site is currently under preparation.
Site 96 - Land opposite St Michael’s Church, Church Lane, Oulton

Suggested Use: Housing
Site Area: 0.39

This site is at the western end of Church Lane, adjacent the Oulton Church. It is currently used as a paddock.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England stated that the site is in opposite 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.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Red’ impact on historic building/landscape grounds. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
Suffolk Wildlife Trust commented that the site is in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. They considered that the site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

A member of the public stated that the land is suitable for housing development.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The main issue identified in the assessment was the impact on the landscape. The site is within tributary valley farmland character area. The Settlement Fringe Landscape Sensitivity Study identifies the area which this site falls within as having a moderate sensitivity, a high value, a major contribution to the setting of the Broads and a very low capacity for development. The site is located very close to The Broads and the western part of the site is exposed to the Broads. The development of the entire site could have a significant impact on the landscape and the setting of the Broads. There is also potential that development of the entire site could impact upon the setting of the Grade I listed church.

Foul sewerage improvements would also be needed if development took place on this site.

Access could also be a constraint if the entire site was to be developed due to the narrowness of Church Lane.

This site could accommodate 4 dwellings.

*Summary of Draft Sustainability Appraisal*

The Draft Sustainability Appraisal identified a significant negative impact on the landscape and a potential significant negative effect on the historic environment for the reasons described above. A minor negative effect was identified in relation to impact on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

In order to mitigate the impacts on the landscape and the historic environment, the appraisal stated that development would need to be restricted to along the frontage of Church Lane.

*Conclusion*

To mitigate the impacts of development on the landscape development would need to be restricted to just along the frontage on Church Lane. This would result in a development of approximately 4 homes which would be too small to allocate in the Local Plan.
Site 98 - Land rear of Elizabeth Terrace, A12 London Road, Gisleham

Suggested Use: Housing
Site Area: 1.80

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /’Green’ impact. Full details can be found on the Council’s website.

Suffolk Wildlife Trust stated that the site, based on aerial photographs, may contain habitats and species of conservation value. They stated that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that the site has.

The landowner stated the site is considered suitable, available and deliverable in the next 1-5 years. They stated the site is potentially accessible from the A12 London Road, and benefits from a road frontage of approximately 50 meters, and given its situation and proximity to existing dwellings it would be easily...
serviceable. They stated that landscape issues could be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. They noted that the site is within cycling distance of Lowestoft. They also noted that historically, seven residential properties were situated on the site, and that the associated footings are still in situ. They acknowledged that the site could be developed alongside sites 22 and 147 allowing for a larger and carefully considered strategic development which may perhaps involve a more substantial road network leading from the A12 London Road.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. A minor issue is that access to the site may be constrained. Access can come from the layby from the A12 but this would result in the loss of mature vegetation on the site boundary. There is a small track but it is unlikely to be suitable for site access. The site could also be accessed from Site 147 if that was developed.

There is potential for a limited impact on the landscape and the site has a poor relationship to the main built up area of Lowestoft. Planting on the site could support biodiversity.

A sewer pipe crosses the site and foul sewerage improvements would be needed to support development.

The site has capacity for approximately 30 homes taking into account the irregular shape of the site and the need to retain the natural features present 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 landscape, natural resources and potentially on biodiversity.

Minor positive effects include the provision of housing.

The appraisal stated that to mitigate the potential impacts on biodiversity, existing natural features should be retained.

**Conclusion**

The site has poor relationship to the existing built-up area of the town. The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

Considering the above, 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.
Site 111 - Land to the north of the A146, Beccles Road, Lowestoft

Suggested Use: Housing
Site Area: 1.37

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council’s website.

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /‘Green’ impact. Full details can be found on the Council’s website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.
Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat’s Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that large part of these sites is owned and managed by Suffolk Wildlife Trust as part of Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

More generally concern was raised about the impact on heath and education services. It was also suggested that brownfield sites should be considered first.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main impact is on the landscape and the setting of the Broads. Tributary valley farmland character area covers most of the site with rural river valleys character covering the land next to the railway line. The Settlement Fringe Landscape Sensitivity Study identified the landscape area as having a low sensitivity, moderate value, a major contribution to the setting of the Broads and a low capacity for development. The site is exposed to distant views from the Broads and the development of the site would extend the urban boundary of Lowestoft towards the Broads in a location where there is currently a more natural edge to the urban area. Given the impact on the landscape and the setting of the Broads, the site is not considered suitable for development.

Other issues include the risk of surface water flooding on the site which may require areas of land to be set aside for drainage on the site. A sewer pipe also traverses the site and foul sewerage improvements may be needed.

The railway to the south of the site could cause issues with noise. The site also has high archaeological potential.

This site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects were the impact on natural resources and the impacts of climate change.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

To help mitigate the impact on the landscape the appraisal states that significant planting around the northern and eastern boundary of the site would limit the impact of the development. Bungalows on the northern boundary would also lessen the impact. However, it is likely there would still be a significant negative effect on the setting of the Broads, given the encroachment of development on the crest of the valley.

Conclusion

Due to the impact on the setting of the Broads, the site is not considered suitable for allocation.
Site 112 - Land to the north of the A146, Beccles Road, Lowestoft

Suggested Use: Housing
Site Area: 4.23

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted a sewer pipe runs through the site. Full details are on the Council’s website.

The Broads Authority stated that the site lies along the Broads boundary albeit separated by the railway line. They raised concern that development on this site would extend the urban boundary of Lowestoft towards the Broads area and could impact upon the landscape and visual amenity. They also raised concern about additional recreational pressures as a result of housing development on Carlton Marshes.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Carlton Colville Parish Council stated that the site should be kept clear of additional development in order to preserve the wildlife of the marshes.
Suffolk Wildlife Trust stated that the site is adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat’s Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI). They stated that a large part of these sites is owned and managed by Suffolk Wildlife Trust as part of its Carlton and Oulton Marshes reserve. They raised concern that development in this location appears likely to risk an adverse impact on these sites and therefore object to an allocation.

Members of the Public opposed the development of this site. They raised concerns about the impact on wildlife on the adjacent Carlton Marshes, including the impact of recreation and dog-walking. It was noted that drainage water could cause pollution in the marshes further down the hill and also adversely affect septic tank drainage of properties.

Concern was also raised about the landscape impact on the setting of the Broads. It was noted that the site currently provides an open vista across to Oulton Broad.

Concern was also raised about the impact on the surrounding road system including the A146 which was considered to be already at capacity with frequent queues stretching from Oulton Broad to Hollow Grove Way.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main impact is on the landscape and the setting of the Broads. Tributary valley farmland character area covers most of the site with rural river valleys character covering the land next to the railway line. The Settlement Fringe Landscape Sensitivity Study identified the landscape area as having a low sensitivity, moderate value, a major contribution to the setting of the Broads and a low capacity for development. The site is exposed to distant views from the Broads and the development of the site would extend the urban boundary of Lowestoft towards the Broads in a location where there is currently a more natural edge to the urban area. Given the impact on the landscape and the setting of the Broads, the site is not considered suitable for development.

A sewer pipe also traverses the site and foul sewerage improvements have been identified.

Other issues include the risk of surface water flooding on the site which may require areas of land to be set aside for drainage on the site. A pit is located to the south of the site which would require infilling.

The railway to the south of the site could cause issues with noise.

**Summary of Draft Sustainability Appraisal**

The Draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects were the impact on natural resources and the impacts of climate change.
Minor positive effects were identified in relation to the provision of housing in an accessible location.

To help mitigate the impact on the landscape the appraisal states that significant planting around the northern and eastern boundary of the site would limit the impact of the development. Bungalows on the northern boundary would also lessen the impact. However, it is likely there would still be a significant negative effect on the setting of the Broads, given the encroachment of development on the crest of the valley.

**Conclusion**
Due to the impact on the setting of the Broads, the site is not considered suitable for allocation.
Site 136 - Rear of 11, 15, 17, 19 & 21 Birds Lane, Lowestoft

Suggested Use: Housing
Site Area: 0.23

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe runs through the site. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact. Full details can be found on the Council’s website.

One member of the public supported the development of this site. They suggested that development should be focussed within the town as it will create less traffic problems than development on the outskirts. They stated it would also encourage healthy transport such as walking and cycling. They noted that plans to address flood risk issues in the town meant that sites within the town could be brought forward for development.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The main issue identified is the risk of flooding. The site is currently within flood zone 2. There is also a risk of surface water flooding.

A sewer pipe also crosses the site and foul sewerage improvements may be needed to support development.

The site has the capacity for 13 new dwellings if the sequential and exceptions tests should be passed.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified on the townscape, climate change and natural resources.

Minor positive effects related to the provision of housing in an accessible location.

Conclusion

As there are other sites with a lesser risk of flooding, this site is not suitable for allocation.

A lack of allocation on this site will not prohibit its future development as the site should the issues with flood risk are overcome. It will be within the settlement boundary/physical limits of Lowestoft, where the principle of development will generally be accepted subject to conformity with the other policies of the Local Plan and national planning policy.
Site 137 - Rear of Nos 485 & 487 London Road South, Lowestoft

Suggested Use: Housing
Site Area: 0.66

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England noted that development on this site could have a potential impact on the setting of listed buildings (Two Chapels and Lychgate at Kirkley Cemetery) and the conservation area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact. Full details can be found on the Council’s website.

One member of the public supported the development of this site. They suggested that development should be focused within the town as it will create less traffic problems than development on the outskirts. They stated it would also encourage healthy transport such as walking and cycling. They noted
that with plans to address flood risk issues in the town more sites within the town could be brought forward for development.

One member of the public felt the site should be left in its current use.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The main issues identified are with the impact on the townscape given the large numbers of mature protected trees on the site.

There is also potential for an impact on the setting of listed buildings in Kirkley Cemetery.

The site has potential biodiversity value.

There would need foul sewerage improvements to support development.

This site could accommodate 14 dwellings.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identifies a potential significant negative effect on the historic environment due to the potential impact on listed buildings with Kirkley Cemetery. It identified minor negative effects on the townscape, natural resources and a possible negative effect on biodiversity.

Minor positive effects related to the provision of housing in an accessible location.

**Conclusion**

Development of this site would have a negative effect on the quality of the townscape through the removal of a number of large mature trees which currently benefit from a tree preservation order. There is a potential that development could impact upon the setting of listed buildings in Kirkley Cemetery. As such the site is not considered suitable for allocation.
Site 147 - The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Suggested Use: Housing
Site Area: 19.69

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency noted that the site was partly within Flood Zone 2 and 3.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Suffolk Wildlife Trust stated that the site partly includes Pakefield Cliffs County Wildlife Site (CWS) and, based on aerial photographs, may also contain habitats and species of conservation value. They state that the site should not be allocated unless it can be demonstrated that this would not result in an adverse impact on either the CWS or any existing ecological value that the site has.
The landowners of the site support the development of Site 147 and consider that it represents a sustainable and deliverable site, capable of accommodating a significant quantum of the planned growth for Lowestoft. They stated that the development would represent a logical extension creating a natural defensible southern boundary to the town. They stated that the existing southern boundary of the town is poorly defined and unattractive. They suggested that if built development is concentrated at the northern end of the site, the southern and western parts could provide a significant area of open space, which would not only provide a community asset, but also an opportunity to enhance the appearance of the town and create an attractive entrance to Lowestoft from the south when travelling along the A12. In terms of impact on the strategic gap they suggested the triangular section of the site to the south be retained as open space resulting in a loss of 300-400m of Strategic Gap. They suggested that development could be kept away from the cliffs and the County Wildlife Site. They stated that the site is well served by public transport from services between Lowestoft and Kessingland and is located close to schools, retail units and employment. The landowners also stated that the site has not been in agricultural use since 1912 when it was used by the Ministry of Defence as a military rifle range and development for housing represents an opportunity to bring the site into productive use, which is not likely to occur otherwise.

One member of the public supported the development of this site and stated that it should provide affordable rented 2-3 bed houses. They noted that the site was close to schools, shops, on a main bus route, and close to the beach.

One member of the public stated that it is crucial to keep the buffer between Lowestoft and Kessingland and another stated that the site is in an open coastal area and adjacent to the Heritage Coast. They stated that it would be totally inappropriate to build on this land and should be left open for wildlife. They also suggested it was a vital gap between Pakefield and Kessingland.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

The eastern part of the site is within the Coastal Change Management Area. Any development will need to be setback by at least 30 metres inland from the Coastal Change Management Area.

The site is within the coastal cliffs landscape character area where the main objective is to maintain the remote coastal character and open gaps which allow glimpses of the coast. The Settlement Fringe Landscape Sensitivity Study states that the landscape area has a low sensitivity, a low value and a high capacity for development. The site is largely flat but poorly related to the suburban area of the town. Development site 22 to the north could help mitigate this. Any development would need to be of lower density, retaining open breaks towards the sea and be sufficiently set back from the coast.

There is a County Wildlife Site on the cliff and there are small collections of natural features such as pond and vegetation dotted around the site which could support biodiversity. These areas and the links between them will need to be retained through any development.
There is considerable historical and archaeological content in the area, mostly dating from World War II. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork and heritage asset assessment, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

There is access from London Road (A12), however, to accommodate a large development there will likely need to be improvements. There would also need to be improvements to the foul sewerage network.

The site has a capacity for 230 dwellings. This takes into account the need to preserve natural features on the site and glimpses of the coast. The total developable area is likely to be around 11.5 hectares. A density of 20 dwellings per hectare is likely to be more appropriate in this location.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect in terms of impact from climate change given that parts of the site are at risk from coastal erosion. Minor negative effects were identified in relation to biodiversity, natural resources, and landscape.

Minor positive effects related to the provision of housing in an accessible location.

In terms of mitigation the appraisal stated that avoiding developing in the area at risk from coastal erosion will mitigate the impacts from climate change and some of the impacts on biodiversity by avoiding the County Wildlife Site. Preserving existing natural features on the rest of the site will also reduce the impact on biodiversity. The impacts on the landscape cannot be completely mitigated as any development would undermine the character of the undeveloped coast and lead to loss of part of the gap between Pakefield and Pontins. However, ensuring the development is set back from the cliff and glimpse of the sea are retained, together with a lower density of development, the impact on the landscape will be reduced.

**Conclusion**

The site does not have a particularly good relationship to existing residential areas and sits within an area characterised by out-of-centre retail and tourism uses. Development of this site would result in a large area of undeveloped coastline being lost to development.

The site falls within the catchment of Pakefield Primary School which is forecasted to be at capacity in the next five years. The school has no potential to expand. This would mean future school children would have poor access to primary school education.

Considering the above, 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.
Site 164 - Land west of Northern Spine Road/north of Pleasurewood Farm, Corton/Oulton

Suggested Use: Housing
Site Area: 18.65

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council’s website.

Historic England stated that the site is adjacent to Parkhill Hotel which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland. Concern was raised about the impact on wildlife and flooding.

More generally, concern was raised about impact on local schools and doctors surgeries.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

There is possibility for vehicular access from Oulton Road although this may not be desirable from a landscape and character perspective.

Approximately 1.7 hectares of the site is used as drainage lagoons associated with the Northern Spine Road. Part of the site suffers from medium to high surface water flooding risk associated with the drain running through the site. There would be a need to investigate whether drainage from development could make use of the lagoons associated with the northern spine road.

Approximately 1.6 hectares of the site was a former brickworks and landfill. This part of the site will need to be avoided.

The development of the site will have an impact on the landscape. The northern section of the site is tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is undulating with a shallow valley running through the middle. The site is exposed from Oulton Road but contained from north, south and east. The drainage infrastructure with palisade fencing around detracts from the visual character of the landscape. Nevertheless care will need to be taken with new development to respect the undulating nature of the site and manage the exposed western boundary. Development may need to be less dense with significant planting. The height of the dwellings may need to be restricted on certain parts of the site.

The Grade II listed Parkhill Hotel is adjacent to the site to the west although development is unlikely to be an impact on the setting. There is high potential for archaeological content. 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.

Foul sewerage improvements have been suggested for the site and development could have a negative impact on junctions in North Lowestoft.
The site has capacity for 390 dwellings at 30 dwellings per hectare. This takes into account approximately 5.2 hectares of undevelopable land associated with the former landfill, bunding and drainage infrastructure.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identifies a significant negative effect on the landscape for the reasons described above. Minor negative effects that were identified were in relation to impact on natural resources and the effects of climate change.

A minor positive effect was identified with respect to the provision of housing.

The appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. To reduce the effect on the landscape development may need to be less dense with significant planting and the height of dwellings may also need to be restricted on certain parts of the site.

Conclusion
The site sits within a sensitive landscape and comprises an undulating valley. Access to the site would be challenging and there is a risk of contamination from the adjacent former landfill.

Considering the above, 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 site 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.
Site 165 - Land west of A12 Yarmouth Road, Corton

Suggested Use: Housing
Site Area: 22.09

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They noted that a sewer pipe crosses the site. Full details are on the Council’s website.

Historic England stated that the site is close to White House Farm which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

National Grid noted that an intermediate pressure gas mains runs through the site.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Corton Parish Council stated that access to the area is difficult as the A12 is a very fast busy stretch of road. They stated that the proposal would double the size of the village which would be a bad thing. They
questioned how access, infrastructure, water, power, drainage, etc. be dealt with and raised concern that the water system is already struggling with low power throughout the village.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.

The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

M J Edwards & Partners objected to the site due to it being well outside the building envelop of Corton village and to far into the strategic gap.

Most Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland. Concern was raised about the impact on wildlife and flooding. Concern was raised about Blundeston being subsumed into Lowestoft through the development of this site. It was suggested developments should be built away from surrounding villages as it detracts from the appeal of such.

More generally, concern was raised about impact on local schools and doctors surgeries and what employment would support the development.

One member of the public supported development on land on both sides of the A12.

**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 development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is flat and largely featureless with the exception of a small number of dispersed oaks towards the middle of the site. The site is well screened from most directions with the exception of Gorleston Road where some boundary planting may be required. The northern part of the site is more exposed and rural in character and development here would have a more significant effect. Limited impact from development on the southern part of the site as A12 already detracts from the landscape.

There is high potential for archaeological content. 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.

There could be a potential impact upon the trunk road network.
A gas main runs through the site and there would need to be improvements to the foul sewerage network if development was to take place.

The site has capacity for 530 dwellings. This assumes a density of 30 dwellings per hectare and the development area reduced by 20% to take into account likely onsite infrastructure requirements.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identifies a significant negative impact on natural resources as the site is grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape and encouraging efficient patterns of movement in support of economic growth.

Minor positive effects were identified in relation to provision of housing.

In terms of mitigation the appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. The effects on the landscape could be mitigated by ensuring development is be less dense to the north with boundary planting along Gorleston Road.

**Conclusion**

Considered as part of a wider allocation with sites 4 and 166, the site provides a sustainable location for future housing growth. Out of all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.

It is not considered that the development of the site will have any impacts on the setting of listed buildings.

To address the concerns raised by Corton Parish Council and some members of the public, the new development allocated under Policy WLP2.12 will need to have its own identity with sufficient separation between existing settlements. The Policy requires the preparation of masterplan which could be produced through a Neighbourhood Plan led by Corton Parish Council.

The site is not at risk of flooding, and surface water run-off will have to be addressed to ensure there is no increase in the risk of surface water flooding locally.
Site 166 - Land east of A12 Yarmouth Road, Corton

Suggested Use: Mixed use
Site Area: 50.57

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. They noted a medium encroachment risk on to the water recycling centre and a sewer pipe crossing through the site. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England stated that the site is close to White House Farm which is a grade II listed building. They stated there could be a potential impact on the setting of this listed building.

National Grid noted that an intermediate pressure gas mains runs through the site.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact. Full details can be found on the Council’s website.
Corton Parish Council stated that access to the area is difficult as the A12 is a very fast busy stretch of road. They stated that the proposal would double the size of the village which would be a bad thing. They questioned how access, infrastructure, water, power, drainage, etc. be dealt with and raised concern that the water system is already struggling with low power throughout the village.

Oulton Parish Council stated that the site was site suitable for development

The Lowestoft & Yarmouth Regional Astronomers stated that agricultural land on the boundary of North Lowestoft should be retained and included in a Green Belt Policy.

M J Edwards & Partners objected to the site due to its location in the Strategic Gap between Lowestoft and Great Yarmouth. They stated the development of the site would make Corton village a sprawled out habitat which would have a negative effect on the centre of the village where there are currently shops and businesses. They also raised concern that the option takes away a large portion of grade two arable land to the north of Corton and also affects an established livery yard business situated on Corton Long Lane which in turn gives employment to several people and companies in the Waveney area

Most Members of the Public objected to the development of this site. They raised concern about development of green areas and the loss of farmland and would close the essential gap between Lowestoft and Gorleston.

One member of the public supported the development of the site as it has immediate access to A12 and could support housing and industry

Summary of Draft Strategic Housing and Economic Land Availability Assessment

A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access could be a constraint. Access is possible from Corton Long Lane. There is possible access from the A12. There is also possible access from Rackham’s Corner roundabout over third party land. Access could also be possible from another access point from the A12. All options would likely require significant improvements or alterations to the highway.

The development of the site could impact upon the landscape. The site is within tributary valley farmland character. This is a flat site well contained within the landscape. There are a small number of large oaks on the site which would need to be retained. There is a small area of woodland/scrubland to the north of the site which would need to be retained. There is a right of way on the northern part of the site which would need to be retained or redirected.

There is a small pond on the site. Woodland to the south of the site would need to be retained. Adjacent woodland to the east is of biodiversity value. There is potential for creating connections through the site with additional planting.
There is high archaeological potential. 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.

There could be a potential impact upon the trunk road network.

A gas main runs through the site as does a sewer pipe. Improvements would have to be made to the foul sewerage network to accommodate development.

Parts of the site are within 400 m of a water recycling centre. Residential development would need to be avoided in this location.

The site has capacity for 750 homes and 10 hectares of employment land. This based on 30 dwellings per hectare. Land area discounted by 6.6 ha to take account of woodland and to create a buffer with employment land. Developable land further discounted by 20% to take account of on site infrastructure.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identifies a significant negative impact on natural resources as the site is grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape and the potential impact on biodiversity.

The appraisal identified a significant positive effect on economic growth by providing for at least half of the objectively assessed need for employment land growth. Minor positive effects were identified in relation to provision of housing, reducing deprivation and encouraging efficient patterns of movement in support of economic growth.

In terms of mitigation the appraisal stated that open space could be provided on the site to address the lack of accessibility to existing open space. To reduce the effect on the landscape and biodiversity, the woodland area to the south of the site should be retained together with existing oak trees on the site.

**Conclusion**

Considered as part of a wider allocation with sites 4 and 165, the site provides a sustainable location for future housing growth. Out of the all the areas in North Lowestoft this area will have the most limited impact on the landscape, given the flat nature of the site, the A47 and the nearby electricity pylons. The sites have access to the strategic road network with bus connections to Lowestoft and Great Yarmouth. The sites, considered together, are of a scale to deliver new services and facilities as well as deliver new employment land in north Lowestoft where there is the most demand. As such the site is allocated as part of Policy WLP2.12, the North Lowestoft Garden Village. Policy WLP2.12 allocates sites 4,165 and 166 for 1,400 dwellings, 2 form entry primary school, playing field, local shopping centre, and 8.5 hectares of employment land.
It is not considered that the development of the site will have any impacts on the setting of listed buildings.

To address the concerns raised by Corton Parish Council and some members of the public, the new development allocated under Policy WLP2.12 will need to have its own identity with sufficient separation between existing settlements. The Policy requires the preparation of masterplan which could be produced through a Neighbourhood Plan led by Corton Parish Council.

The site is not at risk of flooding, and surface water run-off will have to be addressed to ensure there is no increase in the risk of surface water flooding locally.
Site 168 - Land south of Union Lane, Oulton / Land adjacent 19 Union Lane, Oulton

Suggested Use: Housing
Site Area: 0.18

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website. Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Union Lane, Access from Union Lane, although the road is very narrow at this point, which could cause difficulties.

There is potential for contamination due to rubbish being dumped on site. Site is also within source protection zone 3.

The site is heavily overgrown and therefore could support biodiversity

There is a high potential for archaeology. 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.

The site has a capacity for 5 dwellings.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal did not identify any significant effects. A minor negative effect was identified in relation to impact on natural resources.

Minor positive effects were identified in respect of providing housing in an accessible location.

Conclusion
Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. 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 on grade 3 agricultural land. Vehicular access is possible from Hall Lane.
Site 169 - Land south of Union Lane and west of Red House Close, Oulton

Suggested Use: Housing
Site Area: 5.44

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to Blue Boar Inn, grade II to the east and the Manor House grade II * listed to the south east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.
Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure. One respondent raised concern that the village infrastructure not capable of sustain a development of this size. They raised concern about drainage which is already a problem, roads which are too narrow and unpaved for pedestrians.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**  
The assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Hall Lane, although it is over third party land. It is likely therefore that the development of this site will be dependant on the development of site 70/180.

A low level electricity line crosses the site which would need to be diverted or undergrounded. The foul sewerage network will require improvements if development is to take place.

The site has high archaeological potential. 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.

The site has capacity for 162 dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**  
The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified against natural resources.

Minor positive effects related to the provision of housing in an accessible location.

**Conclusion**  
Policy WLP2.14 of the First Draft Local Plan allocates this site as part of an allocation for 200 dwellings. 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 on grade 3 agricultural land. Vehicular access is possible from Hall Lane.

Concerns raised by Historic England with respect to the impact on the setting of the Manor House have been addressed in Policy WLP2.14 by requiring a significant area of open space to be provided on the southern part of the site.
Site 170 - Land to south west of Union Lane, Oulton

Suggested Use: Housing
Site Area: 4.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency stated that the site is within Source Protection Zone 3.

Historic England noted that the site was in close proximity to ruins of Church of St Andrew grade II to the north-west. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact due to potential impacts on scheduled monument. Full details are found in Appendix 3.

Oulton Parish Council stated that the site was not suitable for development due to poor access and egress to road infrastructure.
One respondent raised concern that the village infrastructure not capable of sustain a development of this size. They raised concern about drainage which is already a problem, roads which are too narrow and unpaved for pedestrians.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints or impacts which could not be mitigated. However, there is no evidence that the site is available for development.

Access is possible from Union Lane but this would not be desirable due to the narrow nature of the road. Access would be better achieved from site 169 or 171.

Foul sewerage network improvements would need to take place to support development.

Surface water flooding is an issue on parts of the site indicating a drainage problem. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact on the landscape. The site is within the tributary landscape character area. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. This site is not visible from the Broads and is some distance away. The site is well-screened, mostly flat and well contained in the landscape. The western part of the site is more exposed and development here would have more of an impact upon the landscape.

The site has high archaeological potential. 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.

This site is not available 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, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.

The appraisal indicated that the effect on the landscape could be reduced if development on the western part of the site was of a lower density.
Conclusion

There is no evidence to suggest this site is available for development and therefore cannot be considered deliverable at the present time. The development of this site would extend the built up area further into the countryside than the nearby sites proposed for allocation.

Considering the above, 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.
Site 171 - Land west of Flixton View, Flixton

Suggested Use: Housing
Site Area: 5.32

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England noted that the site was in close proximity to ruins of Church of St Andrew, which is grade II listed, to the west. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact due to possible impacts on scheduled monument. Full details can be found on the Council’s website.

Oulton Parish Council stated that the site was not site suitable for development due to poor access and egress to road infrastructure.
One respondent raised concern about the impact of traffic from either Union Lane or Hall Lane and loss of farmland. It was suggested that using brownfield sites would have a better impact.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
A number of issues were identified with respect to this site. However, the assessment did not identify any constraints or impacts which could not be mitigated.

Access is available from Union Lane but this is unlikely to be desirable due to narrow nature of the road. Access would be better achieved from site 170 or 17.

Improvements to the foul sewerage network have been identified.

There is a large area of high, medium and low surface water flood risk to the south west of the site. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. The southern half of the site is relatively flat and well screened. The northern half of the site is more exposed and mitigation might be difficult.

There is a county wildlife site (Workhouse Wood) along the western boundary, which contains a pond. A small area of vegetation near the site entrance may contain biodiversity. There are hedges along the southern and eastern borders of the site, part of the western border and a field boundary across the site.

The site has high archaeological potential. Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork and visual impact assessment, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

The site has a capacity of 106 dwellings at 20 dwellings per hectare to reflect the more rural character of the area.

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, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.
The appraisal indicated that the effect on the landscape could be reduced if development on the northern part of the site was screened with a significant area of boundary planting.

**Conclusion**

The site is only accessible through the development of other nearby sites. Development of the site is likely to have a greater impact on the landscape than nearby sites proposed for allocation.

Considering the above, 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.
Site 172 - Land west of Parkhill, Oulton (south of Spinney Farm)

Suggested Use: Housing
Site Area: 1.16

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.
Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England note that the site is in close proximity of The Lodge and The Hall, both grade II listed to the east. They noted potential on the setting of high grade and other listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints or impacts which could not be mitigated.
Access onto Parkhill Road. There is good visibility but this is a fast road and the footpath will need to be extended 220 metres to reach the site.

Foul sewerage improvement have been identified to support development.

There is an area at risk of medium and low surface water flood risk in the northern part of the site to the south of Spinney Farm. There is also an area of low surface water flood risk in the middle of the site. Parts of the site may need to be left undeveloped to accommodate drainage systems.

Development of the site could impact upon the landscape. The site is within tributary valley farmland character. The Settlement Fringe Landscape Sensitivity Study identifies the landscape area as having a moderate sensitivity, a moderate value, a moderate contribution to the setting of the Broads and a low capacity for development. The low capacity of this landscape area is more associated with the contribution to the Broads. The site is a well-screened flat site that would have limited impact on the landscape. The site has a poor relationship with the main built-up area and would likely to only be acceptable if developed in conjunction with Site 84.

The site has a high archaeological potential. 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.

The site has capacity for 24 dwellings.

**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, the effects of climate change and impact on natural resources.

Minor positive effects related to the provision of housing in an accessible location.

**Conclusion**

Development of the site is likely to have a greater impact on the landscape than nearby sites proposed for allocation. 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.
Site 178 - Carlton Motors, Rushmere Road, Gisleham

Suggested Use: Housing
Site Area: 0.39

Summary of Response from 'Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The only issue identified in the assessment was the potential for contamination from the existing motor vehicle repair business on the site.

This site could accommodate 4 dwellings.

Summary of Draft Sustainability Appraisal
The Draft Sustainability Appraisal did not identify any significant effects. A minor negative effect was identified in relation to impact on economic growth as the loss of the business would have a small negative effect.

Minor positive effects related to the provision of housing in an accessible location.
**Conclusion**

The site is very small and narrow. As such it would be difficult to fit four dwellings on the site in keeping with the surrounding residential density. As such the site is not large enough for a positive allocation in the Local Plan.
Site 179 - Eades Farm, Beccles Road, Carlton Colville

Suggested Use: Housing
Site Area: 37.96

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

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 site has access onto Beccles Road although improvements will be necessary given the size of the site. The site may offer the potential to deliver part or all of the previously proposed Carlton Colville to Barnby bypass. This road could also provide access to the site. Given the scale of the site, there is likely to be an impact on surrounding roads which will require mitigation.

The development of the site has the potential to impact on the landscape. The site is within Tributary valley farmland character area in the northern part of the site and farmed plateau clayland character area in the southern part of the site. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity a moderate value and a high capacity for development. The site has mature vegetation on most boundaries although is exposed to views from the west. The site is screened from the
Broads by Rookery Park Golf Club. The site at present has a very poor relationship with the existing built-up area. The planned Oakes Farm sports development will extend the developed area of Carlton Coleville up to the boundary of the site but the site will still have a poor relationship with existing residential areas. To mitigate impacts, parts of the site will need to be developed at a lower density and the development would benefit from having an identity of its own, (rather than a suburb) which respects the rural character of the surroundings.

Parts of the site are susceptible to surface water flooding. Parts of the site will likely need to be left undeveloped to accommodate drainage systems.

There are low level power lines crossing the site.

The site has archaeological potential.

The site has capacity for 900 dwellings. This assumes 30 dwellings per hectare and that 20% of the site is used for infrastructure and community services and facilities.

**Summary of Draft Sustainability Appraisal**

The Draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the site is mainly grade 2 agricultural land. Minor negative effects were identified in relation to impact on the landscape, the effects of climate change and efficient patterns of movement.

Minor positive effects were identified in relation to meeting housing needs.

In terms of mitigation the appraisal stated that to mitigate impacts on the landscape the development will need to have its own identity that is respectful to the rural character of the area. This will mean parts of the site, particularly to the west and south will need to be lower density.

**Conclusion**

The site would represent a strategic scale development which would need to be supported by a range of on-site infrastructure. It currently has a poor relationship with the existing built-up area of Lowestoft and Carlton Colville. Parts are closer to Beccles Town Centre than Lowestoft Town Centre which could divert custom away from Lowestoft Town Centre. The site also has poor connections to existing employment areas. The site would not generate the same benefits as the proposed extension to Carlton Colville under Policy WLP2.15.

Considering the above, 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.
Site 181 - Land at the former Lothingland Hospital site, off Airey Close and Allington-Smith Close, Lowestoft

Suggested Use: Housing  
Site Area: 2.59

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation  
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment  
The assessment did not identify any issues with the suitability of the site. This is because the site is already developed for healthcare and residential care purposes.

The site has capacity for 47 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal  
The draft Sustainability Appraisal did not identify any significant effects. No minor negative effects were identified.

Minor positive effects were identified in relation to the provision of housing in an accessible location.
Conclusion
Since this site was submitted the agent has confirmed that only a smaller area of the site is now available. The site is wholly within the settlement boundary for Lowestoft and therefore the principal of development is already supported. As such at present it is not considered necessary to positively allocate a small site such as this within the Local Plan.
Site 182 - Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Suggested Use: Housing
Site Area: 0.93

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

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.

Conclusion
This site makes an attractive contribution to the townscape and the entrance to the town. It provides a positive contribution towards the more rural feel of this locality on the edge of the town.

Considering the above, 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.
Site 183 - Land to the south of Hall Lane, Oulton

Suggested Use: Housing
Site Area: 0.86

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

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.
Site 184 - Oakenshaw, Parkhill, Oulton

Suggested Use: Housing
Site Area: 2.54

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The main issue identified in the assessment was the impact on the setting on the grade II listed building which would be difficult to mitigate. As such the site is not considered suitable for residential development.

Access could be a constraint. There is possible access from the Park Meadows residential estate to the south. However there might be a ransom strip as the highway does not go up to the boundary. There is also potential access from Parkhill although using this access could further impact on the setting of the listed building.

There is a large area of woodland on the site which could support biodiversity. Many of the trees benefit from tree preservation orders and make a positive contribution to the landscape. The site is also within the tributary valley farmland character area which would be heavily impacted by development.
This site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Parkhill Hotel grade II listed building. Minor negative effects were identified on the landscape, natural resources and biodiversity.

Minor positive effects were identified in relation to the provision of housing in an accessible location.

In terms of mitigation the appraisal stated that extensive screening around the site and the retention of the woodland and protected trees could mitigate the impact on the landscape, biodiversity and the historic environment to a degree. Even with mitigation it is likely that there will still be a significant impact on the historic environment as the development will result in the loss of, and change of character of part of the curtilage of the listed building.

**Conclusion**

The site is not considered suitable for allocation due to the impact on the setting of the Parkhill Hotel which is a Grade II listed building. Additionally, access could be difficult to achieve if there is a ransom strip to the south of the site. The development of the site could also lead to the loss of protected trees which make a positive contribution to the settlement fringe in this location.
Site 185 - Parkhill, Oulton

Suggested Use: Tourist accommodation, housing (conversion and redevelopment).
Site Area: 2.27

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The site has been promoted for the following uses:
- Holiday lodges to the north of the site on the area currently used as a car park
- Change of use of managers accommodation to residential
- Replace asbestos chicken sheds with retirement bungalows.

The most serious issue with this site is the potential impact on a grade ii listed building located on site. There is high potential for impact on this building from any development greater than minor developments or conversions.

There is a potential risk from contamination from asbestos from derelict chicken sheds and former landfill site to the north.
In terms of housing provision it is unlikely that the site has capacity for anything more than minor development and conversions.

**Summary of Draft Sustainability Appraisal**

The draft sustainability appraisal identified a significant negative effect on the historic environment due to the impact on the setting of the Parkhill Hotel grade II listed building. Minor negative effects were identified on natural resources.

Minor positive effects were identified in relation to the provision of housing in an accessible location and economic growth associated with the tourist accommodation.

To mitigate the significant negative effect on the setting on the listed building, the lodge development should be small scale and of a low density, limited to the area around the car park to the north of the site, with no loss of vegetation. The bungalow development which replaces the chicken sheds should be of a more rural design of similar proportions to the existing sheds and using the same footprint.

**Conclusion**

The amount of development possible on this site for housing is very small and not enough to warrant a specific allocation in the Local Plan. Some of the proposals for development on this site might be acceptable under existing planning policies. Positive allocation of the entire site in the Local Plan, may give the impression that more development would be acceptable in this location than is appropriate which could lead to substantial harm to the setting of the listed building.
Site 186 - Part of Rookery Park Golf Club, Carlton Colville

Suggested Use: Housing
Site Area: 0.55

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The main issue identified in the assessment was the lack of pedestrian access to the site. The footpath on Beccles Road, Carlton Colville would need to be extended by 350m to reach the site frontage which is unlikely to be viable for such a small development. As such the site is not considered suitable for a residential development.

The site is also in open countryside with a poor relationship to the settlement of Carlton Colville.

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 on access to services and facilities, landscape and efficient patterns of movement.

A minor positive effect was identified in respect of meeting housing need.

Conclusion
The site is isolated in open countryside with no safe pedestrian access. As such the site is not considered suitable for allocation.
Site 187 - Plot 'H', Blundeston Road, Oulton

Suggested Use: Housing
Site Area: 0.61

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The main issue identified in the assessment was the lack of suitable vehicular and pedestrian access to the site. As such the site is not considered suitable for allocation.

Impacts were also identified on the landscape given the sites poor relationship to the existing settlement.

The site has archaeological potential.

This site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The Draft Sustainability Appraisal identified a significant negative effect on the conservation of natural resources as the site is grade 2 agricultural land. Minor negative effects were identified on access to services, landscape and efficient patterns of movement.

A minor positive effect was identified in relation to the provision of housing.

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.
Site 188 - Rear of 334 Beccles Road, Carlton Colville

Suggested Use: Housing
Site Area: 0.69

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The main issue identified in the assessment was the lack of suitable vehicular access to the site. Access is currently by a single lane, unmade bridleway with no junction on to Beccles Road and poor visibility. As such the site is not considered suitable for allocation.

Development could also have an impact on the landscape, which would require mitigation.

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 on the landscape, natural resources and efficient patters if movement.
Minor positive effects related to the provision of housing in an accessible location.

**Conclusion**
The site is not considered suitable for allocation due to lack of satisfactory access to the site with little potential for improvements.
Beccles and Worlingham Area

Site 1 - 19-21 Ravensmere, Beccles, Suffolk

Suggested Use: Housing
Site Area: 0.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England stated there is a potential impact on the Conservation Area and setting of the Grade II Listed 18 Northgate to the West.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Amber/Green’ impact. Full details can be found on the Council’s website.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site would require clearance and there is the potential for contamination from the previous garage/workshop uses. This would require remediation work.

The site is in a Conservation Area and the frontage is highly visible. Well designed development could improve the site and enhance the Conservation Area.

Redevelopment of the site would involve loss of the jobs from the site, however it is proposed to move these to employment land and nearby Ellough.

The site is considered to have capacity for 5 dwellings at 50 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not detect any significant effects. Minor negative effects included the effect on contamination on ground water from the former commercial garage.

Minor positive effects include the sites location close to services and employment, which could help promote sustainable movement patterns. This site could also provide housing to meet local needs.

There is an unknown impact on the historic environment relating to the Conservation Area.

The appraisal suggests that existing buildings should be re-used and sensitive design could mitigate effects to the Conservation Area. Contamination monitoring should also be carried out.

Conclusion

The site is wholly within the settlement boundary for Beccles and therefore the principal of development is already supported. As such at present it is not considered necessary to positively allocate a small site such as this within the Local Plan.
Site 8 - Chenery's Land (East), Cucumber Lane, Beccles / Land at Chenery's Farm, Beccles

Suggested Use: Housing
Site Area: 10.00

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber' impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.
The Landowner made representations in support of this site. They stated that walking and cycling would be encouraged with links to existing and future cycle and pedestrian networks, including routes to employment areas. They highlighted that schools, services and the railway station are within walking and cycling distance. They stated the site is deliverable, developable, achievable and is not prone to flooding. It was contended that air quality would be maintained by development of this site. It was stated there is capacity available in water supply and sewerage systems and surface water could be disposed of. They asserted that development could be designed to blend in the landscape and surroundings, low carbon processes would be used in construction, the land is low grade agricultural land and biodiversity and geodiversity would be supported by development of the site. It was stated that development of the site would help to support Beccles town centre, create construction jobs and help Waveney District Council to achieve their housing targets.

A member of the public is supportive of this site provided that vehicular access is from the Southern Relief Road and the nearby smaller residential roads are used for pedestrian and cycle access only. Infrastructure should be provided if this site is developed along with neighbouring sites.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Existing vehicle access is unsuitable for a development on a site of this size and there is no footpath. Access of all types could be improved by linking to neighbouring sites which have been proposed for development.

The foul sewerage network will require improvements to support development. Overhead lines cross the site.

Some local surface water flooding has been recorded but this is not expected to be a significant issue.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for development. This site is exposed and extends into the open countryside.

The site has high archaeological potential.

With the access issue solved, the site could accommodate around 240 homes.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects include the effect on the landscape, due to the sites’ irregular shape and exposure, impacts of climate change and the loss of greenfield land.

Minor positive effects include the accessibility and local services which would help encourage sustainable movement patterns. This site would also provide housing to meet local needs.
The appraisal suggested in terms of mitigation that a footpath to the west of Cucumber Lane could be included as part of a development. This would be very close to the meeting the footpath being constructed as part of the development of 20 homes on the triangular site to the northeast of this site. Combining with neighbouring sites could create a more cohesive appearance. The Southern Relief Road will change the character of the landscape in this location, reducing any negative impact. The pond on site should be surveyed and sensitive landscaping employed as part of any development.

**Conclusion**

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.
Site 9 - Chenery’s Land (West), Cucumber Lane, Beccles / Land at Chenery’s Farm, Beccles

Suggested Use: Housing
Site Area: 3.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.

No comments received from Parish Councils.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.
The landowner has provided a response in support of development of this site. They stated that the site is well located in relation to the town centre and existing employment sites, and links to the walking and cycling network would be built, including access to new networks forming part of the Southern Relief Road. They highlighted that schools, services and the railway station are within walking and cycling distance and access to the site will benefit from the Southern Relief Road. They stated that the site is deliverable, developable, achievable and there are no known abnormal constraints on the site and it is not prone to flooding. There are a lack of brownfield sites on the edge of Beccles making this greenfield site more suitable. It was contended that air quality would be maintained by development of this site. There is capacity available in water supply and sewerage systems and surface water could be disposed of. They stated that development could be designed to blend in the landscape and surroundings and low carbon processes would be used in construction. The land is low grade agricultural land and biodiversity and geodiversity would be supported by development of the site. It was asserted that a proposal would help to support Beccles town centre, create construction jobs and help Waveney District Council to achieve their housing targets.

One member of the public made comments and is supportive of this site provided that vehicular access is from the Southern Relief Road and the nearby smaller residential roads are used for pedestrian and cycle access only. Infrastructure should be provided if this site is developed along with neighbouring sites.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. There is currently no footpath serving the site and vehicular access is poor for major development. Cycle access is good.

Foul sewerage improvements would be needed to support development. Overhead lines also cross the site.

The Settlement Fringe Sensitivity Study identifies this piece of land as the tip of an area which has low capacity to accommodate development. The area to the east is high capacity and there is moderate capacity to the west. The Southern Relief Road will alter the character of the landscape to the south creating a hard edge. Trees and buildings to the east of the site provide some screening.

There are ponds on-site and nearby which should be surveyed.

The site has high archaeological potential.

This site could accommodate 100 new dwellings.

Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to the impact on the landscape, the loss of greenfield land and the effect on nearby ponds.
Minor positive effects were identified in relation to provision and access to services and employment which will help encourage sustainable movement patterns. The provision of housing will help meet housing need.

Negative and potential negative effects could be mitigated through the provision of pedestrian access to the site, and surveys and remedial action for nearby ponds.

**Conclusion**

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.
Site 12 - Low Meadows, Cucumber Lane, Weston

Suggested Use: Housing
Site Area: 1.13

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted the development of this site would have a ‘Green’ impact

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated and has no public footpath to access it. This makes the site unviable for development.
Foul sewerage improvements would be needed to accommodate development. This would likely be substantial and not economically viable.

There is a risk of contamination from the builders yard use.

Clearing the site may make it more attractive for development.

Most of the site is within the tributary valley farmland character area although some is also in the farmed plateau clayland character area. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a high sensitivity, a high value and a low capacity for development. Edge of site appears to be enclosed by earth deposits, creating a bund on north and east edges.

A pond on site would require surveying for protected species.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative impacts included access to services and facilities and impact on the rural economy.

Minor positive effects included health and well-being, delivering housing, impact on the landscape, development of a brownfield site, and encouraging efficient movement.

**Conclusion**

The site is remote from services and facilities and is not considered to be suitable for allocating for housing.
Site 16 - Former Beccles Heat Treatment, Gosford Road, Beccles

Suggested Use: Housing
Site Area: 0.48

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England highlighted the proximity of Grade II Listed Buildings on Blyburgate and the potential impact on the Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

No comments received from Town or Parish Councils.

One member of the public commented that they would like to see this site re-developed as a mixed use development along with some other adjacent sites. Another member of the public expressed a preference for indoor sports facilities to be located here and somebody else supported a manageable sized development on this brownfield site.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed if development was to occur.

This is a brownfield site with the buildings on site have been partially demolished, therefore there is potential for contamination on the site.

The northern part of the site is in a Conservation Area and adjacent to a locally listed building, although the site is not prominent in the Conservation Area and potential development may have only a limited impact on the townscape and character of the Conservation Area.

There are commercial and retail uses in the adjacent buildings to the east; a supermarket-type store to the south; and a commercial garage nearby to the northeast. There are potential residential amenity issues arising from the adjacent commercial garage and the tall buildings to the east.

Development would result in a loss of employment; however employment uses on the site could take place on industrial sites at Ellough.

The site has capacity for 19 dwellings at 50 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Negative impacts include the loss of employment land and potential contamination of ground water.

Minor positive effects include proximity of the proposed dwellings to services and employment. This could also encourage sustainable movement patterns.

The site is well located for services and facilities and which would promote walking, however, there are potential residential amenity issues arising from the nearby commercial garage and dominating buildings. Therefore the effect on the health and well being of the population is considered to be neutral.

Residential development should be positioned away from the commercial garage to the northeast and the tall buildings to the east of the site to safeguard residential amenity. Careful investigation and treatment of contamination would be required to minimise risks from contamination.

Conclusion

The unneighbourly commercial garage and dominating buildings would generate amenity issues making the site unsuitable as a housing allocation as proposed. If the vacant site to the west were to come forward then there would be an opportunity to explore a comprehensive, mixed use redevelopment of both sites.
Site 24 - Homestead Farm, Ringsfield Road, Beccles

Suggested Use: Housing
Site Area: 14.48

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that 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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the southwest of the town. Site 24 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.
Members of the public objected due to traffic congestion, highway safety, impact on the National Cycle Network, pressure on local services and infrastructure and encroachment into the countryside. One member of the public would like to see it used as a campsite or nature reserve.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. There are currently no footpaths serving the site.

Foul sewerage improvements would be needed to support development.

There is a high risk of surface water flooding at the southern extremity of the site.

The south and western edges of the site are exposed and development would be visible in views across the countryside. The Landscape Character Assessment recommends avoidance of exposed edges of development. The Settlement Fringe Study identifies the landscape as having moderate capacity to accommodate development.

The site has high archaeological potential.

Traffic from this site could impact on the junctions within Beccles.

The site could accommodate 260 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal
A significant negative effect on natural resources was identified arising from the loss of a greenfield site and grade 2 agricultural land. Minor negative effects included lack of existing access to footpaths and bus stops, the impact of climate change and the impact in the landscape.

Minor positive effects included health and well being of the population from accessibility of open space, employment and GP surgery by cycle and delivering housing to meet local needs.

Links to neighbouring sites could provide access to footpaths and bus stops. Landscaping would mitigate the landscape impact to some degree. There is no mitigation for the loss of greenfield land or grade 2 agricultural land.

Conclusion
Development of this site will only be possible through a combined development with site 156 to the east as access on to Ringsfield Road will not be appropriate. Compared to other sites on the edge of Beccles and Worlingham, this site is likely to have a more severe impact on the landscape, given the higher sensitivity of the landscape in this location. The site also comprises higher grade agricultural land.
The site is considered less favourable to the other preferred sites in Beccles for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Beccles under the strategy outlined under Policy WLP1.1, therefore the development of this site would result in an unnecessary loss of high grade agricultural land in a more sensitive landscape. As such the site is not considered suitable for allocation in this Local Plan.
Site 36 - Land at Cromwell Road and London Road, Weston

Suggested Use: Mixed use
Site Area: 10.83

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that 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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

No Parish or Town Council comments received.

One member of the public objected as the site is remote from the town, not well located to services and facilities and is exposed in the landscape.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are no footpaths or public transport serving the site and the main road is not suitable for cyclists.

The foul sewerage network would need improvements to be able to support development. Overhead lines also cross the site.

Some records of surface water flooding on eastern parts of the site.

The site is bounded by the railway line and roads on three sides and there are buildings to the south, however development would still be visible in the countryside. Care should be taken to avoid exposed edges as suggested by the landscape character assessment.

The pond on site should be surveyed for biodiversity potential.

The site has high archaeological potential.

Housing should be carefully positioned away from unneighbourly employment uses.

The site could accommodate 108 new dwellings at 20 dwellings per hectare and would provide 5.4 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included lack of access to open space for housing, no pedestrian links and lack of public transport and no safe cycle links. The proposed employment uses may harm residential amenity for the dwellings. There is the potential for development to be exposed in the landscape. Development would result in the loss of a greenfield site and is at risk of surface water flooding.

Minor positive effects included creation of employment opportunities and promoting economic growth, delivering housing to meet needs and providing opportunities to reduce commuting distances.

There is a potential negative effect on biodiversity relating to the pond found on site, however this effect is not fully known.

Landscaping would help to limit the visual impact of development in the landscape. Housing could be separated from unneighbourly employment uses to reduce harm to residential amenity. The pond should be surveyed protective measures put in place as required.

Conclusion

Due to the remote position from the town centre and lack of transport options, this site is not considered to be a suitable location for housing. Whilst the site could be suitable for employment development it is
considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.
**Site 43 - Land at Montrose Garage, London Road, Beccles**

Suggested Use: Housing  
Site Area: 1.32

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**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Historic England highlighted the potential impact on the nearby Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the
southwest of the town. Site 43 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

Badger Building commented they are in a position to bring the site forward in the early years of the plan without reliance on other sites and that the site is well related to existing development.

One member of the public objected on the grounds of traffic congestion and pressure on the medical centre. Two members of the public were supportive and stated the road links were good, it is a brownfield site (although density seems high) and traffic hot spot of Ingate/Lowestoft Rd is avoided.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**
The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to accommodate development.

The current petrol station and garage use will require remediation to make the site suitable for residential use.

Some surface water flooding has been recorded on the site.

Settlement Fringe Landscape Sensitivity Study identifies this site as having a moderate sensitivity, a moderate value and a moderate capacity for development. However the views of the site from the countryside are limited.

The site has capacity for 30 dwellings.

**Summary of Draft Sustainability Appraisal**
The Sustainability Appraisal did not identify any significant effects. Minor negative effects included the potential to contaminate ground water.

Minor positive effects included good walking and cycling links to services and facilities, and delivering housing to meet needs. There is also the potential to improve the appearance of the site and enhance the street scene and setting of the Conservation Area.

Well designed development on London Road could improve the appearance of the street. The grass area to the rear of the site should be retained to minimise the loss of grade II agricultural land.

**Conclusion**
Policy WLP3.2 of the First Draft Local Plan allocates this site as part of an allocation for 250 dwellings. The site has good access to existing services, facilities, schools and employment opportunities in Beccles and the surrounding area via footpath, public transport, cycle and road links. The site offers moderate
landscape value but is considered to be reasonably well contained in the landscape, therefore the impact should be minimal. Redevelopment of this site also provides an opportunity to extend the cemetery.
Site 44 - Land at Sandpit Lane, Worlingham

Suggested Use: Housing
Site Area: 1.31

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a low risk to encroachment on the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Amber/Green’ impact.

Worlingham Parish Council stated that this site ranked as the second choice preferred site due to its proximity to the Southern Relief Road.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.
Badger Building commented they are in a position to bring the site forward in the early years of the plan without reliance on other sites and that the site is well related to existing development.

Members of the public objected due to pressure on infrastructure and facilities, excessive housing numbers in combination with nearby sites, loss of wildlife habitat, increased traffic, inadequate highway, school traffic issues, loss of a greenfield site, surface water drainage issues and lack of capacity in the sewerage system.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**
The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to support development. There is a low encroachment risk to the water recycling centre.

The site is visible across the countryside from the west. The Settlement Fringe Landscape Sensitivity Study indicates that this landscape area has a low sensitivity, a low landscape value and a high capacity for new development.

There are ditches, hedgerows and trees on the site which may have biodiversity value.

An eastern portion of the site is within 400 metres of a water recycling centre. This could cause smells for dwellings on this site.

The site has a capacity for 20 dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**
The Sustainability Appraisal did not identify any significant effects. Minor negative effects included loss of a greenfield site and encroachment in to the countryside and the potential loss of trees and hedgerows.

Minor positive effects included proximity footpath access; proximity to services and employment and contributing to meeting housing need. This site could also promote sustainable movement patterns.

The southern tree belt should be retained and combined with other landscaping to minimise the effect on the landscape.

**Conclusion**
Whilst the development of the site would have limited impacts, the site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles 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.
**50 - Land at the junction of Copland Way and the A146 Beccles / Lowestoft Road, North Cove**

Suggested Use: Mixed use  
Site Area: 7.73

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the proximity of Grade I and II Listed Buildings and potential impact upon their settings (Church of St Botolph to the north and Three Horseshoes Public House).

Suffolk County Council commented this site is one of the further sites from the town centre and less likely to encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
No Parish or Town Council comments received.

Members of the public objected due to large distance to existing facilities and development increasing the reliance on cars for transport, characterless development along the roadside, pressure on the A146 and close proximity to industrial areas.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. There is no pedestrian access and the roads are not safe for cyclists. There is a bus stop nearby but this is not easily accessible.

Foul sewerage improvements would be needed to support development. A sewer pipe crosses the site.

Development here would be highly exposed and prominent, particularly in views from the west. The site is elevated in the landscape and development would have a very prominent appearance. The Landscape Character Assessment for the northern and most visible part of the site advises that development should avoid creating lit or exposed settlement edges, particularly in the context of the landscape setting of The Broads.

Some of the site is Biodiversity Action Plan (BAP) priority habitat.

The site has high archaeological potential.

Potential from some amenity issues from industrial uses to the south.

The site could provide 2.3 hectares of employment land and 9200 square metres of floorspace for retail and leisure.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was identified in the loss of the pond and deciduous woodland with is a BAP priority habitat. Minor negative effects included health and well-being, access to services and facilities, landscape impact, loss of a greenfield site and impact on the town centres (from proposed retail use).

Minor positive effects included delivering housing, supporting economic growth and encouraging efficient movement patterns (locating housing near to employment opportunities).

There were unknown impacts on water quality.

The appraisal suggested that the deciduous woodland should be retained and protected/enhanced. The pond on site should be surveyed and protected as required.
Conclusion
The site is considered to be remote with no pedestrian access and very poor cycle access and is therefore not considered to be suitable to allocate for housing. The Biodiversity Action Plan priority habitats on the site and the landscape impact also make it unsuitable for other types of development.
Site 60 - Land east of College Lane, Worlingham

Suggested Use: Housing
Site Area: 5.08

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crossed the site.

Historic England highlighted the potential impact on the setting of the grade II Listed Building (Worlingham Manor to the west).

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Worlingham Parish Council voted this site as their preferred site for development due to the proximity to the proposed Southern Relief Road.
Members of the public objected due to strain on infrastructure and facilities, loss of wildlife habitat, increased traffic, inadequate highways, school traffic issues, lack of capacity in the sewerage system, surface water drainage issues, uncharacteristically high density of development, excessive housing numbers alongside nearby proposed sites and loss of a greenfield site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The site makes up setting of the grade II listed Worlingham Manor and development would cause significant harm to the setting which could not be mitigated.

Some of the local roads are narrow with poor visibility and the site is close to bends and junctions. Pedestrian and cycle access is good.

Foul sewerage would need improvements to support development. A sewer pipe also crosses the site.

Records of surface water flooding on the site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having a low sensitivity, a low value and a high capacity for development. The site projects in to the countryside and would create an exposed edge, contrary to advice in the Landscape Character Assessment.

There are nearby ponds and a watercourse to the south of the site which may have biodiversity value.

The industrial estate to the south may be harmful to residential amenity.

Summary of Draft Sustainability Appraisal
Harm to the grade II listed Worlingham Manor was identified as a significant negative effect. Minor negative effects included creation of an exposed development in the landscape, the effects of climate change and the loss of a greenfield site.

Minor positive effects included proximity to open space, primary school, employment opportunities and facilities, helping to meet housing need and good cycle access.

The appraisal suggested that the adjacent pond should be surveyed for biodiversity value, however there is no clear mitigation measure in regards to the effects on the listed building.

Conclusion
Due to the harmful impact on the setting of a grade II listed building and the exposed appearance that development on this site would generate, this site is not considered suitable for development.
Site 61 - Land east of Copland Way, Ellough Industrial Estate

Suggested Use: Employment
Site Area: 16.64

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Beccles Town Council support this site for employment use but highlighted the inadequate highway infrastructure including roads, buses and pedestrian and cycle access.

Suffolk Wildlife Trust objected to development of this site unless it can be demonstrated there would be no adverse impact on the County Wildlife Site which makes up part of the site.
The landowner’s agent responded to the consultation to promote this site. The representation provides a description of the site, its history, and relevant local and national planning policies. It highlighted recent largescale planning permissions. The representation also amended the outline of the submitted site to exclude a County Wildlife Site. They consider the site to be suitable, available, achievable and viable (provided utilities capacity issues are overcome).

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Pedestrian, cycle and public transport links are poor.

The water recycling centre and the foul sewerage network will require improvement if development was to take place. Improvements to the water recycling centre are dependent on the scale and type of employment development.

Some records of surface water flooding.

There is potential for contamination from industrial uses which could be a risk to residential use.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for development. Development of the east of the site would be exposed in the landscape. The Landscape Character Assessment states that exposed edges should be avoided.

There is a County Wildlife Site in the eastern most part of the site. This should be surveyed and protected.

There is some archaeological potential on the site.

The site could provide 15 hectares of employment land.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included impact on the landscape, loss of greenfield land, the effects of climate change, potential harm to the neighbouring County Wildlife Site, and lack of footpaths, cyclepaths and public transport.

Minor positive effects were the creation of employment opportunities which will reduce unemployment and support the economy.

The appraisal suggested that the County Wildlife Site should remain undeveloped and protective measures put in place as required. Exposed edges of development should be avoided. Addition of foot/cycle paths and/or public transport to serve the site would encourage sustainable travel patterns.
Conclusion
The development of this site for employment uses would extend the existing employment area further into the countryside to the east. As such it would have a greater impact on the landscape than the employment sites allocated by Policies WLP3.1 and WLP3.3. These sites together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.
Site 62 - Land east of Ellough Road, Worlingham

Suggested Use: Housing
Site Area: 12.00

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the potential impact on the grade II Listed Building (Worlingham Manor to the north east).

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

No comments were received from Parish or Town Councils.
Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area. Members of the public objected due to lack of facilities and infrastructure, loss of wildlife habitat, excessive housing numbers, increase in traffic with particular reference to school traffic, lack of capacity in the sewerage system, surface water flooding, higher numbers of non-locals and retirees may put a strain on facilities and loss of a greenfield site. Concerns were also raised regarding the nearby industrial areas and problems arising from noises and smells. It was suggested that open space, leisure facilities and a pub/restaurant could be incorporated in to a development. One person supported the site as it has road, cycle and footpath links.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The foul sewerage network requires improvement.

Development would project in to the countryside and would be exposed. The Landscape Character Assessment recommends avoiding exposed edges. The Settlement Fringe Landscape Sensitivity Study identifies this site as having a low sensitivity, a low value and a high capacity for development.

There are ponds by the northeast corner of the site which may have biodiversity value.

Grade II listed Worlingham Manor lies around 150 metres to the east and development may impact on its setting.

There are two industrial areas to the south and east of the site which are unneighbourly uses.

This site could provide 270 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

No significant effects were identified. Minor negative effects include exposed development in the landscape, potential harm to biodiversity features and harm to the setting of the listed building.

Minor positive effects included proximity to open space, employment opportunities, primary school, and post office; and delivery of housing to meet need. This site could also promote sustainable movement patterns.

Mitigation could include avoidance of exposed edges through good landscaping and layout; surveying the adjacent pond for protected species; and a landscaped buffer may help to reduce the impact on the setting of the listed building.
Conclusion

The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles 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.
Site 69 - Land north of Church Lane, Ellough

Suggested Use: Housing
Site Area: 1.31

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Concern was raised about the inability of the road network to support additional traffic and the adverse impact that new development would have on wildlife habitats.
Summary of Draft Strategic Housing and Economic Land Availability Assessment
There is no footpath serving the site and public transport which makes the site unviable for development.

The site is wooded and on a gradient. There would be clear views of the site from the south near Ellough Church and the public footpath here. Development would appear intrusive on the rural landscape and would result in a significant effect on the landscape which could not be mitigated.

Foul sewerage improvements would be needed to support development. This improvement would be substantial and most likely financially unviable.

Development would lead to a loss of trees which could provide habitats for local wildlife.

Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects included health and well-being, access to services and facilities, landscape impact, loss of a greenfield site, loss of wildlife habitat (trees) and encouraging efficient patterns of movement.

One minor positive effect identified was the delivery of housing.

Conclusion
The remote location and the site’s prominence in the landscape means that it is not considered to be suitable for allocation.
Site 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Suggested Use: Mixed use
Site Area: 24.02

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Historic England highlighted the potential impact on the Beccles Conservation Area and its setting.

National Grid stated that the site is crossed by or within close proximity to intermediate/high pressure apparatus.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact.
Beccles Town Council stated that the site should remain as an open break and a park created.

The Beccles Society strongly opposed this site for development and its development would be highly damaging. They identified that development of the site would conflict with the Council’s Green Infrastructure Strategy. The site is valuable in assisting flood mitigation. They commented that Beccles Town Council (who control part of this site) have not authorised its inclusion as part of the new Local Plan.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not have an adverse ecological impact.

There were strong objections from members of the public for a number of reasons. The loss of the open break between Beccles and Worlingham and resultant harm to the character and setting of the settlements was a key reason for objecting. Loss of wildlife habitat, flora and fauna was another key reason as was development in an area prone to flooding which could exacerbation of flooding problems. Many people have cited increased traffic congestion, poor access, inadequate roads, parking issues, lack of capacity in the sewerage system, low water pressure and strain on local facilities and infrastructure as reasons for objection. Loss of views across the common, noise generated from a nearby dog boarding kennel, loss of sports facilities and development of the site conflicting with the Council’s Green Infrastructure Strategy are also reasons for objection. Many members of the public commented that the site (or part of the site) belongs to the people of Beccles and is controlled by Beccles Town Council and they do not wish to see this land developed.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

Development would conflict with the aims of the Rural River Valley character area in the Landscape Character Assessment which could not be mitigated. The Settlement Fringe Study states the area provides long views toward Beccles common and the Broads, provides a moderate contribution to the setting of the Broads, and has a moderate capacity to accommodate development. Development of the southern part of the site would contribute to the coalescence of Beccles and Worlingham.

The foul sewer network will need improvement to support development and it should be noted that a sewer pipe crosses the site.

The northern part of the site is in flood risk zone 2 and is subject to surface water flooding.

The northern part of the site is a floodplain grazing marsh and the southwest boundary takes in deciduous woodland which are both Biodiversity Action Plan priority habitats.

The site has high archaeological potential.
Summary of Draft Sustainability Appraisal

A significant negative effect on the landscape and townscape was identified in the loss of the open break between Beccles and Worlingham on the northern side of Lowestoft Road, resulting in increased coalescence of the two settlements. Minor negative effects included loss of greenfield land, the effects of climate change and harm to and loss of Biodiversity Action Plan priority habitats.

Minor positive effects include proximity of facilities and schools, protection of existing sports pitches and open space and provision of housing to meet needs.

The appraisal suggested that some of the northern part of the site could be used as open space to be compatible with the BAP habitats however this would need expert advice.

Conclusion

Development of this site would erode the views of the Broadland landscape to the north and harm the setting of the Broads. It is not considered that this impact could be mitigated. Therefore the site is not considered suitable for development. Additionally, the loss of the openness of this part of Lowestoft Road would result in increasing the coalescence of Beccles and Worlingham. The site also features some sensitive Biodiversity Action Plan priority habitats.
Site 77 - Land off Benacre Road, Ellough, Beccles (Site 1)

Suggested Use: Mixed use
Site Area: 36.98

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

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.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council commented this site is one of the furthest sites from the town centre and less likely to encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact.

Beccles Town Council supported this site for employment use but highlighted inadequate highway infrastructure including roads, buses and pedestrian and cycle access.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are no public footpaths serving the site or connecting to public transport. Cycle access is poor. However the site is of a sufficient size to provide services on site.

Foul sewerage improvements would be needed for development. Electricity and gas supply may be limited.

Some evidence of surface water flooding on site.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having a low sensitivity, a low value and a high capacity for development. The south and central parts protrude in to open countryside and the southern part of the site is exposed.

Nearby Ellough Wood is a Biodiversity Action Plan habitat and is sensitive. An extension to Ellough wood would provide some mitigation to landscape impact.

The site has high archaeological potential.

The size of the site means development could impact upon local roads and junctions.

The adjacent karting track and employment uses would be unsuitable neighbours for residential development.

The site could accommodate 695 new dwellings at 30 dwellings per hectare and provide 4 hectares of employment land.

Summary of Draft Sustainability Appraisal

Significant negative impacts were identified in relation to access to services and facilities, harm to biodiversity in regards to the impact on Ellough Wood and harm to economic growth with the loss of the allocated enterprise zone. Minor negative effects were identified in relation to health and well-being of the population, impact on the landscape, the effects of climate change and loss of a greenfield site.

Minor positive effects included provision of housing and proximity of housing to employment opportunities. The site could also encourage sustainable movement patterns.

The appraisal suggested that the south of the site should be well landscaped to avoid an exposed edge in the landscape. An extension of Ellough Wood to the west is proposed which should be carried out, with the whole wood being protected and surveyed. Pedestrian access to bus stops and safe cycle routes should be provided to improve access. The submission refers to relocation of the enterprise zone to a neighbouring site which would mitigate the loss from this site to some degree. A noise assessment of neighbouring uses such as the karting track and air strip should be undertaken and mitigation carried out as required.
Conclusion

The site is remote from Beccles and public transport, cycle and footpath access is poor or non-existent. As a mixed use development including housing, the site is not considered suitable for allocation in this Local Plan. The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision.

The northern part of the site, which forms part of the Enterprise Zone is considered suitable for employment development as an extension to the existing industrial estate. This land is allocated under Policy WLP3.3 of the First Draft Local Plan.

Site 78 - Land off Benacre Road, Ellough, Beccles (Site 2)

Suggested Use: Employment

Site Area: 1.24
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is no pedestrian access to the site and cycle routes are poor. This is likely to become worse with the building of the southern relief road.

Foul sewer improvements would be needed to accommodate development.

The site is farmed plateau clayland. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for development. Development would extend into the open countryside. The Landscape Character Assessment recommended the avoidance of exposed edges.

The site could provide 1.1 hectares of employment land.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any constraints that could not be mitigated. Minor negative effects include the impact on the landscape, the loss of greenfield land and the lack of encourage for sustainable transport due to the poor connections to the site.

Minor positive effects include the provision of employment, which will support the economy.

Landscaping was recommended to soften the edges of the development. Foot and cycle paths were also recommended to encourage sustainable movement patterns.

Conclusion

The development of this site for employment uses would extend the existing employment area further into the countryside to the east. As such it would have a greater impact on the landscape than the employment sites allocated by Policies WLP3.1 and WLP3.3. These sites together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.
**Site 81 - Land off Darby Road, Chenery’s Farm, Beccles**

Suggested Use: Housing  
Site Area: 20.53

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

No Parish or Town Council responses received.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.

Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.
Some members of the public objected on the grounds of over development, surface water flooding, strain on sewerage system, increased congestion, parking issues, pollution issues, harm to the character of Beccles and lack of local jobs.

Other members of the public were supportive of development of this site provided good cycle and pedestrian links are provided and vehicular access is from the Southern Relief Road. Smaller residential roads nearby should be used for cycle and pedestrian access only. Development of this site along with neighbouring proposed sites could deliver infrastructure such as a community centre, shops, school, health centre and a pub.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. Vehicular traffic access should be from the Southern Relief Road or across a neighbouring site for development.

Foul sewer improvements will be needed to support development.

The Settlement Fringe Landscape Sensitivity Study identifies that this landscape area has a moderate sensitivity, moderate value and a moderate capacity for new development. The site is irregularly shaped and extends in to open countryside. The southern relief road will mitigate this visual impact to some degree.

The west of the site features biodiversity habitats and protected trees under the BAP priority habitat.

The site includes allocated allotment land (BEC4), this could be provided as part of a new development.

Pedestrian and cycle access is good, however access comes from a minor road.

The industrial site to the west may generate amenity issues.

The site could accommodate 465 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal
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.

Minor positive effects were identified in respect of access to services and facilities, housing delivery, and housing in cycling distance of employment opportunities. This could help promote sustainable movement patterns.

The appraisal suggested the Retention and protection and/or enhancement of the woodland to the west of the site which would mitigate harm to the landscape and biodiversity. A more compact and regular
shaped site would reduce the intrusion into the landscape. Extensive landscaping should be provided to avoid a hard edge to the settlement. Allotments could be provided as part of the development to mitigate the loss of the allocated site.

Conclusion

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.
Site 82 - Land off Ellough Road, Beccles

Suggested Use: Housing
Site Area: 52.42

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

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. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Beccles Town Council opposed development of this site due to proximity to industrial areas, noise and air pollution, increased traffic along Ellough Road connecting into a bottleneck at Ingate. Infrastructure would not cover the needs of residents who would still need to travel in to the town centre.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.
Suffolk Wildlife Trust stated that careful consideration of this and adjoining sites will be required to avoid adverse impacts on the wildlife value of the area.

Worlingham Neighbourhood Planning Team viewed the site as unacceptable due to the impact on infrastructure, drainage, roads, schools, medical facilities and lack of local jobs.

Members of the public objected on the grounds of surface water drainage issues, loss of privacy, lack of jobs locally, over development and loss of wildlife habitat. Increased traffic and vehicle pollution, the site not being well related to supermarkets and secondary schools and generation of school traffic problems were also raised. Fumes, noise and pollution from the nearby industrial sites and loss of a greenfield site were given as reasons for objections. One person stated that the land is unstable and munitions have been dumped on the site. Pressure on infrastructure such as the medical centre, schools and dentists was commonly highlighted. Another person stated that development of the site would result in Worlingham would become a suburb of Beccles. One person commented that the quality of life for existing and future residents should not be put at risk to meet the demands of landowners and developers.

A nearby business was concerned about the proximity of site 82 to existing industrial operations and the noise nuisance for future occupiers that may result if the site is developed. They highlighted it would be difficult for them to re-locate and jobs and business rates may be lost if they cannot operate with the housing development nearby.

A number of people supported development of this site due to its good vehicular access to the Southern Relief Road and major road links and potential for good cycle and pedestrian links. Low existing landscape value and the ability to provide a significant numbers of homes, along with infrastructure including schools, shops, medical provision and recreation were given as reasons of support to develop site 82. One member of the public stated that development of the site would have little environmental or visual impact and could be a significant benefit to the town.

There were suggestions of providing a pub and overnight accommodation, green space, health services, dentists, schools, community centres and town centre parking improvements as part of a development. A park and ride facility to the centre of Beccles was also suggested. One person has commented that the mix of homes should reflect the needs of the community and include smaller starter homes and retirement properties along with larger family homes.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access will have to come from Ellough Road or the Southern Relief Road.

Foul sewerage improvements would be needed to support development. A sewer pipe also crosses the site.

Some areas on the site are at risk of surface water flooding.
The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a low value and a high capacity for new development. Development will extend into the open countryside; however the Southern Relief Road will mitigate this to some degree.

Ponds adjacent to the site may provide biodiversity and habitats.

The site has high archaeological potential.

A development of this scale may impact on local roads and the wider network. A transport assessment will be required to assess this.

Nearby employment uses could generate amenity issues.

This site could accommodate 950 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in respect to the loss of a greenfield site, the effects of climate change and the potential impact on biodiversity.

Minor positive effects were identified in respect of access to services and facilities, improving educational attainment, housing delivery and housing in cycling distance of employment opportunities. This could help promote sustainable movement patterns.

The appraisal suggested that housing should avoid the southeast corner of the site which is close a waste depot. The edge of the development should be sensitively landscaped to avoid an exposed edge. The adjacent ponds should be surveyed and mitigation measures employed as required.

**Conclusion**

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all. The provision of employment uses opposite existing employment uses will limit the conflict between existing industry and new housing.
Site 107 - Land to the East of London Road, Beccles

Suggested Use: Mixed use
Site Area: 2.57

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that substantial off-site infrastructure is required to connect to the foul water which may not be economically viable.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Amber/Green’ impact.

No Parish or Town Council comments were received.

The Beccles Society stated that housing adjacent to the Beccles Relief Road should be of a limited scale and not all sites should be for housing.
**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The road is national speed limit and not very safe for cyclists. There is no footpath to Beccles.

Foul sewerage improvements will be needed to support development, which may not be economically viable. Overhead lines also cross the site.

This site could be made attractive to the market if issues of noise from industrial uses and nearby roads can be overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The southern relief road will change the character of the landscape but hard edges should be avoided. Care will be needed to avoid exposed edges in line with the landscape character assessment.

Development would be sandwiched between an industrial site and the relief road which is likely to generate amenity issues for housing.

The site could accommodate 30 dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to health and well-being of the population, access to services and facilities and loss of greenfield land.

Minor positive effects were identified with respect to reducing deprivation, generating employment and delivering housing.

The appraisal suggested that avoiding town centre uses on the site would reduce competition with the town centre. Improving pedestrian, cycle and public transport links would improve accessibility.

**Conclusion**

This site is considered to be too remote from the town centre, services and facilities to be suitable for housing development. The size and shape of the site would make it difficult to be utilised for employment uses, unless used as an extension to M and H Plastics to the north.
Site 108 - Land to the east of London Road, Beccles (south of John Lawrence Close)

Suggested Use: Housing
Site Area: 1.63

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses through the site.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the southwest of the town. Site 108 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.
A member of the public did not oppose affordable homes and bungalows where they are built in manageable sizes around the periphery of the town. Site 108 is on a main road where there is currently little development and does not feed into busy traffic areas such as Ingate/Lowestoft Rd.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. A sewer pipe also crosses the site.

There are high levels of surface water flooding on parts of this site.

This site could be made attractive to the market if noise issues can be overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. There is good boundary hedging and the site is currently well screened.

A pond on site may provide habitats for local wildlife.

A noise survey would be required with respect to the adjacent railway line and A145.

The site could accommodate 50 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

No significant effects were identified. Minor negative effects were identified in relation to effects of climate change and loss of a green field site. A pond on site would require careful treatment.

Minor positive effects were identified with respect to improving the health and well-being of the population, access to services and facilities, delivering housing and access to employment sites.

**Conclusion**

The site is considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles 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.
Site 124 - London Road, Weston, Beccles

Suggested Use: Housing
Site Area: 8.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that substantial off-site infrastructure is required to connect foul water, which may not be economically viable.

Suffolk County Council welcomed reference to the Southern Relief Road and stated the proposed level of growth around Beccles is generally acceptable subject to further assessments and the exception of sites further from the town centre which would not encourage sustainable travel.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
Beccles Society stated that development of site 124 would result in urban sprawl beyond the Southern Relief Road and that housing on land adjacent to the road should be limited in scale. Members of the public have commented that development of this site would result development creep into the countryside and over reliance on cars. This would generate issues with parking, congestion and pollution.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. There are no footpaths and roads are poor for cyclists.

Foul sewerage improvements are required to support development.

This site can be made attractive to the market if noise and amenity issues are overcome.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The site would protrude into open countryside beyond the proposed relief road. The Landscape Character Assessment states that extensions into the landscape should be closely monitored and exposed edges avoided.

The east and south part of the site are Biodiversity Action Plan priority habitat.

The site has high archaeological potential.

The proposed roundabout adjacent to the site could create amenity issues.

The site could accommodate 137 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was identified due to the impact on Biodiversity Action Plan priority habitat. Minor negative effects were identified with respect to health and well-being, access to services and facilities, impact on the landscape, loss of a greenfield site and encouraging efficient movement patterns.

A minor positive effect is the provision of housing to help meet local needs.

**Conclusion**

This site would extend development south of the planned Southern Relief Road. It will therefore have a greater impact on the landscape than preferred sites. The site is therefore considered less favourable to the preferred allocations which are closer to Beccles and will deliver greater benefits in terms of infrastructure provision. These preferred sites cumulatively deliver more than sufficient housing for Beccles 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.
Site 126 - Marsh Lane, Worlingham

Suggested Use: Housing
Site Area: 0.44

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a high risk to encroachment of the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.

A member of the public objected due to the site being too close to the sewage works and that they have limited capacity. The high density of development would be out of character with the area and there would be an increase in traffic using a narrow lane.
Summary of Draft Strategic Housing and Economic Land Availability Assessment
The site is no accessible to pedestrians and there is no feasible mitigation to see any link back to Worlingham.

The foul sewerage network will require improvements. There is also a high risk of encroachment on the water recycling centre.

The site is visible from the Broads area. The landscape has a high landscape value and has a major contribution in the setting of the Broads and has a very low capacity to accommodate development.

Summary of Draft Sustainability Appraisal
A significant negative effect was identified with respect to the impact on the landscape and the setting of the Broads. Minor negative effects were identified due to loss of a greenfield site and the potential impacts on biodiversity.

Minor positive effects were identified with respect to access to services and facilities and delivering housing. There is a potential positive effect on promoting sustainable movement patterns from this site.

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 in this Local Plan.
Site 133 - Owls Cottage, Marsh Lane, Worlingham, Beccles

Suggested Use: Housing
Site Area: 0.53

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that there is a high risk to encroachment of the Water Recycling Centre.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

No Parish or Town Council comments received.

A member of the public objected due to the site being too close to the sewage works and that they have limited capacity. The high density of development would be out of character with the area and there would be an increase in traffic using a narrow lane.
Summary of Draft Strategic Housing and Economic Land Availability Assessment
The site is not accessible to pedestrians and a link back to Worlingham is not feasible.

There is a high risk of encroachment on the Water Recycling Centre which could also generate amenity issues. The foul sewerage network requires improvements and a sewer pipe crosses the site.

The settlement fringe study indicates this area has a very low capacity to accommodate development and makes a major contribution to the setting of the Broads. The site is screened by the surrounding woodland, however this could be lost to development.

Summary of Draft Sustainability Appraisal
A significant negative effect was identified due to the impact on the high value landscape and the setting of the Broads. A minor negative effect was identified in due to the loss of a greenfield site and the potential impact on biodiversity.

Minor positive effects were identified with respect to access to services and facilities and delivering housing.

The appraisal suggested that the design and scale of new development would need to take account of the existing houses and impacts on existing trees.

Conclusion
Due to the impact on a high value landscape area which makes up the setting of the Broads and the risk of encroachment to the Water Recycling Centre this site is not considered to be suitable for residential development. 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 this Local Plan.
Site 145 - The Bull Field, Ringsfield Road, Beccles

Suggested Use: Housing
Site Area: 3.13

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England has commented that there is a potential impact on the setting of a grade II* Listed Building (Ashman’s Hall around 500m to the north west) and Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Beccles Town Council recognised the need for development but highlighted that care is required due to the strain on infrastructure. They comment that housing development should be located to the southwest.
of Beccles, including site 145, as this would make best use of road infrastructure. New infrastructure would be required including a primary school and convenience store.

Members of the public have objected due to highway safety concerns on Ringsfield Road related to traffic congestion, sharp bends in the road, school traffic, parking problems, the narrow width of the road and impact on the National Cycle Network. There were objections to access from Meadow Gardens although one person has no objection if the access was onto an alternative road. The strain on infrastructure such as the medical centre and schools was highlighted. Objections were raised to the loss of mature trees on the site, harm to biodiversity habitats, and disruption to a quiet area. Concerns are also raised with reference to drainage issues, surface water flooding, water pressure, sewerage capacity and the lack of public transport.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. Vehicular access on to Ringsfield Road could be difficult due to limited visibility. This could be improved by linking to another site for development.

The foul sewerage network would require improvements to support development.

Views of the site from the west across open countryside. Settlement Fringe study indicates the landscape has a moderate capacity to accommodate development. This is a flat site which is visible from open countryside to the west but not from the road network or the public right of way.

Boundary ditches and hedges could be providing habitats for local wildlife and could be lost if the site is developed.

The site has high archaeological potential.

Development could increase traffic on Ringsfield Road which is narrow in places.

The site could accommodate 62 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects included impact in landscape and loss of greenfield land.

Minor positive effects included health and well-being, access to services and facilities and delivering housing.

The appraisal suggested that the design and scale of new development would need to take account of the visual impact of the site when viewed from open western aspect.
Conclusion

Development of this site would only be possible through access from neighbouring sites. Land to the east is allocated in the First Draft Local Plan, but this site together with land allocated by WLP3.1 to the south of Beccles cumulatively deliver more than sufficient housing for Beccles 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.
Site 156 - West of A145 London Road, Beccles

Suggested Use: Housing
Site Area: 9.67

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They also commented that a sewer pipe crosses the site.

The Broads Authority highlighted the need to assess impact in the landscape due to rising ground.

Historic England highlighted the proximity of the site to Beccles Conservation Area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact.

Beccles Town Council identified the need for development in the area but infrastructure in Beccles is at breaking point, especially the health centre. Housing development should be restricted to the area to the
southwest of the town. Site 156 makes good use of existing and planned road infrastructure. This area would require a new primary school, convenience store and other infrastructure.

Members of the public objected due to traffic congestion, pressure on infrastructure and facilities, harm to peace and privacy, impact on property values and encroachment into the countryside. One member of the public supported this site as it will not cause worsen traffic problems at Ingate/Lowestoft Rd.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. The foul sewerage network would require improvements to accommodate development. A sewer pipe also traverses the site as do some overhead lines.

There are some recorded of surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. Development would intrude into the open landscape and would be in conflict with the Landscape Character Assessment. Development would project into the countryside and would require careful treatment.

The site has high archaeological potential.

Traffic from the site could impact on the junctions in the centre of Beccles.

The site could accommodate 240 new dwellings at 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal
A significant negative effect was identified in the loss of grade 2 agricultural land. Minor negative effects included impact in the landscape and the impacts of climate change.

Minor positive effects included health and well being of the population, access to services and facilities, delivering housing and encouraging efficient movement.

The appraisal suggested that sensitive landscaping may mitigate the impact on the edge of the settlement to a limited degree.

Conclusion
Policy WLP3.2 of the First Draft Local Plan allocates this site as part of an allocation for 250 dwellings. The site has good access to existing services, facilities, schools and employment opportunities in Beccles and the surrounding area via footpath, public transport, cycle and road links. The site offers moderate
landscape value but is considered to be reasonably well contained in the landscape, therefore the impact should be minimal. Redevelopment of this site also provides an opportunity to extend the cemetery.
Site 174 - West of Ringsfield Road, Beccles

Suggested Use: Housing
Site Area: 1.96

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Submitted after the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. Access is via Ringsfield Road with twists in the road.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development.

A pond and a hedgerow could have biodiversity potential.

A locally listed building neighbours the site to the south.
The site could accommodate 30 new dwellings at 15 dwellings per hectare.

Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects identified in respect of landscape impact.

Minor positive effects included health and well-being, access to services and facilities and delivering housing.

The appraisal suggested that sensitive landscaping may mitigate the impact on the edge of the settlement to a limited degree.

Conclusion
Development of this site would only be possible through access from neighbouring sites. Land to the east is allocated in the First Draft Local Plan, but this site together with land allocated by WLP3.1 to the south of Beccles cumulatively deliver more than sufficient housing for Beccles 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.
Site 175 - Land to the north of the Evergreens Garden Centre, Weston

Suggested Use: Residential, commercial or light industrial
Site Area: 1.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. There is no footpath or public transport serving the site. The road is not safe for cyclists.

Existing and proposed employment uses could generate amenity issues for residents. There would be some landscape impact.
Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to health and well-being access to services and facilities landscape impact and loss of a greenfield site. There is also a potential impact on biodiversity.

Minor positive effects included creation of employment and delivering housing.

Conclusion
The remote location and its lack of relationship to the existing residential areas of Beccles means that this site is not considered to be suitable for allocation in this Local Plan.
Site 176 - Land to the west of the A145, Weston

Suggested Use: Commercial or light industrial use
Site Area: 0.57

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. There are patches of the site that are at risk of flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development. The site is in open countryside and has a poor relationship to existing residential areas.

This site could provide 0.57 hectares of employment land.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects relate to health and well-being, the loss of greenfield land, the impact on biodiversity and potential impacts on landscape, climate change and sustainable movement patterns.

Minor positive effects refer to increasing skills and reducing deprivation by providing new jobs.

The appraisal suggested that landscaping could mitigate some of the effects of the landscape, and that sustainable transport policies could promote sustainable transport incorporation into the site.

Conclusion

It is considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.
Site 198 - Chenery’s Loke, Cucumber Lane, Weston

Suggested Use: Housing
Site Area: 0.45

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
Access is via a single-width, unmade track with no pedestrian access, making the site unsuitable for development.

Telephone cable traverse the site.

The site is remote from the edge of Beccles and would intrude in to the countryside. No public transport links. The site would project beyond the proposed southern relief road. This site is remote from the nearest settlement and other proposed development allocations. There is the potential for significant landscape impact as a result.
Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and loss of greenfield land. There is also a potential impact on biodiversity.

Minor positive effects included improving health and well-being and delivering housing.

The appraisal suggested that landscaping may provide some mitigation but it is not considered that impact in the landscape could be fully mitigated.

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 in this Local Plan.
Site 205 - Old MJ Hales Scrapyard and Landloc, Cucumber Lane, Weston

Suggested Use: Housing
Site Area: 2.33

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Site submitted after the consultation began.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. Vehicular access is from Cucumber Lane which is single width for stretches with no dedicated footpath.

The site is likely to be contaminated from the previous scrap yard use.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a high sensitivity, a high value and a low capacity for new development. The site is surrounded by open countryside and development would have an intrusive appearance if the site was developed on its own.

Ponds on site will require care to avoid harm to biodiversity.
Development could impact upon the surrounding roads.

The site could accommodate 70 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and the potential impact on biodiversity.

Minor positive effects included health and well-being, delivering housing and encouraging efficient movement patterns.

The appraisal suggested that footpaths should be used to serve the site and that the local ponds should receive protective measures.

**Conclusion**

Policy WLP3.1 allocates this land as part of strategic development allocation of 1250 new homes, 5 hectares of employment land and supporting community infrastructure to the south of Beccles. The wider site presents an opportunity to develop a comprehensive mixed use development. Comprehensive planning of the site will enable delivery of substantial green infrastructure including public open space, a country park and integrated landscaping schemes which will promote contact with nature, healthy lifestyles and wellbeing for all.
Site 207 - Land to the west of Evergreens Garden Centre, Weston

Suggested Use: Employment
Site Area: 0.54

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Submitted during consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. This site is separate from the existing settlement and could impact upon a fairly open area of landscape and has a poor relationship to existing built up area.

Could impact on proposed development on site 175 if development takes place.

The site could accommodate 0.54 hectares of employment land.
Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects include impacts on health and well-being, as well as potential impacts on the landscape, climate change and sustainable movement patterns.

Minor positive effects include improving skills, reducing deprivation and supporting the economy.

The appraisal suggested that planting and screening could mitigate some of the landscape impacts.

Conclusion
It is considered that the employment sites allocated by Policies WLP3.1 and WLP3.3 are in more preferable locations given their proximity to the Enterprise Zone and together will deliver more than enough employment land for Beccles under the strategy outlined under Policy WLP1.1.
**Bungay Area**

**Site 37 - Land at Dukes Bridge, Beccles Road, Bungay**

Suggested Use: Housing  
Site Area: 1.58

*Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation*

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They commented that there is a high encroachment risk to the Water Recycling Centre and a Sewer Pipe crosses the site.

The Environment Agency commented the site as being partly in Flood Zone 3 with a flood plain the area that would naturally be affected by flooding if a river rises above its banks, or high tides and stormy seas cause flooding in coastal areas.

Historic England highlighted Dukes Bridge House, Barn and wall all Grade II to the north. There is potential impact on setting of a Listed Building.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Suffolk Wildlife Trust commented that based on aerial photographs, site 37 may contain habitats and species of conservation value. They therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

Members of the public highlighted issues with the lack of infrastructure, drainage and the site being low-lying land with a water course.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site is floodplain grazing marsh which is a Biodiversity Action Plan (BAP) priority habitat. Loss of this habitat could not be successfully mitigated. Large parts of the site are in flood zone 3 (high risk) and further parts in flood zone 2 (medium risk). There is also a high risk from surface water flooding.

The site is also a valuable natural green area which contributes to biodiversity and holds flood water, amongst other things. These functions could not be easily replicated in the town.

Development of the site would undermine the open character of the site which contributes positively to the townscape. Retention of open space on the site would mitigate this harm to some degree.

Development would remove the open space which contributes to the setting to the nearby listed building to the northwest. Retention of open space near to the listed building would mitigate this harm to some degree.

There is a water recycling centre (WRC) less than 100 metres away to the southeast. This may cause issues with smells and there is a high risk of encroachment on the WRC. There is also a sewer pipe crossing the site and foul sewerage improvements have been identified.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was identified with respect to the loss of a BAP priority habitat. Minor negative effects included harm to the townscape through loss of open space, impacts on the effects of climate change relating to flood risk, loss of natural resources and harm to the setting of a listed building.

Minor positive effects included reasonable good links to services and facilities, improving health and well being (access to meeting places and open spaces), delivering housing and encouraging sustainable movement patterns.

In terms of mitigation, the appraisal suggested building homes that are compatible with flooding and to retain open space near the listed building.
Conclusion

This site is in flood zone 3a. There are alternative sites that are not at risk of flooding and therefore allocation of this site would be contrary to national planning policy. Impacts on biodiversity and open space also undermine the suitability of this site for development.
Site 39 - Land at Grove Farm, Mettingham

Suggested Use: Housing
Site Area: 7.70

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated that housing development at this location has the potential to impact adversely on both the landscape character and the visual amenity. Any scheme at this location would need to be sensitively designed to ensure that potential impacts are assessed and mitigated through a suitable layout and the provision of adequate vegetation buffers both on the northern boundary and within the site as it is located on rising ground. Street lighting and other above ground utilities may be an issue.

The Environment Agency commented that site lies partly within Source Protection Zones 1 and 3.

Suffolk County Council commented that subject to further assessments through the planning process, the proposed level of development is acceptable in principle. However, access constraints are likely to be
identified on site 39. Any proposed access onto Annis Hill would require widening of the road due to its narrow width and this site should provide its main access from B1062.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Members of the public objected due to:
- Annis Hill is not wide enough for two-way traffic. The brow of the hill restricts visibility. Recently built properties have worsened traffic problems. Annis Hill is well used by runners, cyclists and dog walkers. Traffic on Beccles Road is fast and busy and accesses and junctions can be dangerous;
- lack of mains sewerage, gas and electricity supply;
- sandy ground may be unsuitable for building on;
- development may generate surface water flooding issues for properties downhill;
- current infrastructure such as doctors, dentists, schools and car parks could not sustain an increased population;
- development would be harmful to the landscape viewed in the approach from Beccles. The skyline would be too high for this side of Bungay;
- loss of residential amenity through loss of views, tranquillity and privacy;
- harmful to house prices;
- loss of greenfield site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site is within the tributary valley farmland character area. The landscape is very sensitive according to the Settlement Fringe Landscape Sensitivity Study and makes a major contribution to the setting of the Broads. Therefore the landscape impact is a significant constraint which would be difficult to mitigate.

There is a potential impact on biodiversity habitat in the form of a pond adjacent to the site. The site also has archaeological potential.

There would also need to be improvements to the foul sewerage network.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was identified with respect to the landscape impact. The site is very sensitive, very visible, has a strong sense of place and makes a major contribution to the setting of the Broads. Minor negative effects included the loss of a greenfield site and impact on biodiversity.

Minor positive effects included health and well being (within cycling distance of open space), access to services and facilities, delivering housing and encouraging sustainable movement patterns.

The appraisal suggested that an exposed settlement edge should be avoided and the local pond should be protected.
Conclusion

Due to the harmful impact in the landscape and the setting of the Broads this site is not considered suitable for development.
Site 45 - Land at St Johns Road, Bungay

Suggested Use: Housing
Site Area: 4.65

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Red’ impact.

The landowner, St John’s Hall Farms, confirmed the site is available for development, suitable and deliverable. If required, the landowner will discuss the potential for additional land to the southeast of the site (up towards Dukes Farm) to be included as a comprehensive proposal for the area.

Members of the public objected due to:

- lack of local infrastructure such as a railway station;
- strain on existing infrastructure such as schools, doctors surgery and sewerage system;
- risk of flooding;
- loss of greenfield land which forms a natural boundary to Bungay;
- loss of wildlife habitat;
- nearby roads are too narrow;
- increased traffic congestion;
- proximity to a Listed Building;
- lack of local employment;
- harm to property prices;
- loss of views;
- people have walked along the edge of the field for over 20 years and it should be a designated public right of way.

One person supported development of this site for housing and other leisure facilities.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The northeast edge of the site is in flood zones 2 and 3 and there are records of surface water flooding. The eastern corner of the site is proposed for an attenuation pond as part of the BUN1 development for 150 dwellings, employment land and open space. The site has a moderate capacity to accommodate development. Transport assessment of the site is advisable.

The site has a high archaeological potential and would require foul sewerage improvements to support development.

The site could accommodate 85 dwellings when removing areas at risk from flooding and areas of land needed for surface water attenuation.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified with respect to climate change and the potential effects of flooding, impact on the landscape and loss of a greenfield site. Impact on flooding could be mitigated by developing only parts of the site which are not at flood risk and are not required for the attenuation pond.

Minor positive effects included health and well being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

The appraisal suggested that the enhancement of hedgerows and streams could help mitigate the effects on biodiversity.
Conclusion

Policy WLP5.1 of the First Draft Local Plan allocates this site for 85 dwellings. The allocation does not include land at risk of flooding. The site represents a natural extension to the south of the town with good access to the road network and public transport. The high school is within walking distance and a primary school is within 1 km. Local services and facilities are within walking distance. Vehicular access to St Johns Road would be possible. The site will be adjacent new employment premises being built around the swimming pool. Development could help formalise pedestrian and cycle connections between Kings Road and Meadow Road. There is no evidence of any wildlife habitats on the site and the Policy requires provision of landscaping to mitigate the impact on the setting of nearby listed buildings.
Site 55 - Land between Pilgrim's Way and Wingfield Street, Bungay

Suggested Use: Housing
Site Area: 1.04

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. They commented that there is a low risk to encroachment of the Water Recycling Centre and a Sewer Pipe crosses through.

Historic England commented that the site is adjacent to Bungay Conservation Area, 14 Wingfield Street which is a Grade II Listed Building and is close to 5-11 Wingfield Street which is also a Grade II Listed Building. Therefore there is a potential impact on Conservation Area and setting of Listed Buildings.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact. Full details can be found on the Council’s website.
Suffolk Wildlife Trust stated that Based on aerial photographs, site 55 may contain habitats and species of conservation value. They therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

Halsbury Homes Ltd commented that the site is presently allocated under Policy BUN5 for Allotments/Open Space in the Waveney Site Allocations Development Plan Document. They noted from the supporting text that the land "has been protected for allotment use and an important open space in the built up area for many years." The supporting text also notes that "most of the site falls within an area of medium flood risk (flood zone 2), taking into account climate change."

The Local Planning Authority’s has aspirations to provide allotments on this site, however, the site has stood derelict for many years since the site was last used and efforts to realise these ambitions since the Waveney Site Allocations Development Plan Document was adopted in 2011 have been unsuccessful. Halsbury Homes has the controlling interest in the land at St. Johns Road and there is no realistic long-term prospect of the site being returned to allotment use.

The Environment Agency's Flood Map shows clearly that the whole site is in flood zone 1 (less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year). The Local Planning Authority’s concerns about Site 55 are therefore without foundation.

The site is approximately 400m to the south east of town centre, which has a good range of shops and other services and facilities. Site 55 is therefore in a sustainable location within a sustainable settlement and it is considered that there are no sound planning reasons why the site could not come forward during the Local Plan period.

Members of the public have objected due to:
- lack of infrastructure;
- one of the last remaining open spaces in the town and should not be considered for housing. It should be reserved for recreational/amenity use for future generations;
- flooding issues;
- lack of access suggesting Wingfield Street and Pilgrims Way are unsuitable. Dangerous junctions nearby;
- designated as land for allotments and there is unmet local demand for allotments;
- currently provides a green lung and habitat for wildlife.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**
The assessment did not identify any constraints that could not be mitigated. Part of the site is within 400m of a water recycling centre and a sewer pipe crosses the site. Foul sewerage improvements have been identified for the site.

A petrol pump on the site may mean some contamination on the site.
Much of the site is in flood risk zone 2 identified in the Strategic Flood Risk Assessment. Large areas of the site are at risk of surface water flooding.

The northwest corner of the site is in the Conservation Area and there are a number of listed and locally listed buildings nearby to the north and west. The part of the site adjacent to Wingfield Street is currently untidy and sensitive design could enhance the Conservation Area. An ecology survey of the site would be required – there is potential for habitats and species of conservation value.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included the risk of flooding in relation to climate change, the loss of a greenfield site and potential harm to biodiversity.

Minor positive effects included health and well-being; access to services and facilities; delivering housing; and encouraging sustainable movement patterns.

There were uncertain effects on the historic environment and townscape.

The appraisal suggested retaining hedgerows and trees and that housing design should be flooding compatible.

**Conclusion**

Much of the site is at risk of flooding leaving only 0.2 hectares sequentially preferable for development and safe access/egress would need to be addressed whilst safeguarding heritage assets and neighbour amenity. This level of development is considered too small for allocation in the Local Plan. In any case the site is within Settlement Boundary as defined by Policy WLP1.3 of the First Draft Local Plan. This, in principle will allow for development of housing on this site outside of the flood zone.
Site 206 - Land rear of Bungay High School

Suggested Use: Housing
Site Area: 12.00

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
This site was submitted as part of the consultation exercise. The landowners commented that they considered that sustainable modes of transport can be encouraged by making it safe, convenient and affordable. The development of land to the rear of the High School enables a better solution for bus access to the High School. The roads around the school, particularly Kings Road and Queens Road currently suffer from congestion and traffic conflicts during school opening and closing times. The new access will alleviate the problems caused by school coaches and buses.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that could not be mitigated. Access to the site is proposed via the approved development on the BUN1 site to the northeast on to St Johns Rd. St Johns Rd is a main road but traffic modelling would be beneficial.

There are small pockets on surface water flood risk to the south of the site. A drainage strategy will be important due to some sloping on the site.
The site extends into the countryside although it lacks landscape features and the settlement fringe study indicates a high capacity to accommodate development. Boundary hedges have some biodiversity value. There is a grade II listed building around 300 metres to the south of the site and there is potential for archaeology.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and loss of a greenfield site.

Minor positive effects included health and well-being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

Good landscaping could help mitigate the impact on the landscape and setting of the listed building.

**Conclusion**

Policy WLP5.2 of the First Draft Local Plan allocates this site for 220 dwellings. The site adjoins the high school and land with planning permission, forming an extension to the built up area of Bungay. The site lacks distinctive landscape features and its landscape value is not high. There is good access to local services, facilities and employment land. The allocation includes a parking and turning area for school buses which will alleviate school traffic in the roads to the north of the high school. An extension to the school playing field is also included along with public open space.
Site 209 - Land south of Mountbatten Road, Bungay

Suggested Use: Housing
Site Area: 10.28

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

The site was submitted during the consultation.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access to the site is proposed on to St Johns Rd via the development sites to the east. Cycle and pedestrian access and possibly secondary vehicular access may be possible via Mountbatten Rd to the north.

There are records of surface water flooding on the very fringes of the site.

The site projects in to open countryside although there is little in the way of features to make a contribution to the landscape. The settlement fringe study identifies that the site has a high capacity to accommodate development. Boundary trees and hedges and a small pond in the southwest corner have potential biodiversity value.
There is some archaeological potential on the site and grade II listed buildings to the south and west.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects included landscape impact and the loss of a greenfield site.

Minor positive effects included health and well-being, access to services and facilities, delivering housing and encouraging sustainable movement patterns.

Sensitive landscaping will mitigate the impact on the landscape and the setting of the listed building. Surveying and protecting hedges, trees and ponds will mitigate harm to biodiversity.

**Conclusion**

The site is considered less favourably to the sites allocated in the First Draft Local Plan for Bungay. These preferred sites cumulatively deliver more than sufficient housing for Bungay 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.
Halesworth and Holton Area

Site 13 - Fairview Farm, Norwich Road, Halesworth

Suggested Use: Mixed use  
Site Area: 6.78

This site is a thin strip of flat land which stretches between Fair View Road in the south and Sparrowhawk Road in the north. The site is heavily overgrown and there is a county wildlife site located to the north west of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified that this site is located within source protection zone 1.

Historic England cautioned that development on this site could impact upon the setting of Archers Cottage, which is a grade II listed building.

National Grid advised the Council that an intermediate high pressure gas main runs under the site.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Halesworth Town Council stated that this site is important for wildlife habitat.

Halesworth and Blyth Valley Partnership stated that this site is an important habitat for diverse flora and fauna. A previous attempt to convert this land for use as a playing field was resisted by Members of the Public and had the support the then Member of Parliament. Wildlife on this site is still active and must be preserved.

Suffolk Wildlife Trust noted that this site is located next to a county wildlife site and may also contain species and habitats of conservation value. Therefore this site should not be allocated unless it can be demonstrated that species and habitats will not be harmed.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. Surrounding roads are reasonably wide and could accommodate further development. The Sparrowhawk Road roundabout to the north might need to be enlarged if this site is developed. The foul sewer network requires improvement prior to development. However, further work will be needed to provide adequate road access to the site.

This site is part of an area identified in the Settlement Fringe Landscape Sensitivity Study as having high landscape sensitivity and a moderate landscape value. Overall it has a moderate capacity to accommodate new development. The southern edge of this site is close to a sensitive urban edge. This site is not particularly visible because it is fairly flat and overgrown so it makes only a limited contribution to the landscape.

There are electricity lines running along the southern and northern edges of the site.

The northern and western parts of the site are vulnerable to surface water flooding.

Development on this site would likely be highly visible from farmland to the east and Fair View Road to the south.

The site has a high archaeological potential.

The assessment identifies that the site has a potential capacity for 83 dwellings at a density of 30 dwellings per hectare. The assessment also identifies that the site could deliver 4.32 hectare of employment land.
Outline of Draft Sustainability Appraisal
The draft Sustainability Appraisal identified a potential significant negative effect on the setting of grade II listed Archer’s Cottage. However, the exact impact cannot be ascertained until any plans for development are submitted. Minor negative effects included a loss of agricultural land and biodiversity.

Minor positive effects include close proximity to shops, services, health facilities, and employment opportunities, the provision of additional jobs and housing. Development would support economic growth and would help to create sustainable patterns of movement.

There is uncertainty about the impact of development on the local landscape.

Trees and hedges around the edge of the site should be retained to mitigate landscape impact. Sympathetic design should also be enforced to minimise landscape impact.

Conclusion
The character of this part of Halesworth is defined by the industrial estates on the west side of Norwich Road. 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. Development would also have the potential to impact upon the setting of a listed building and impact upon biodiversity. Alternative sites in Halesworth are more accessible to town centre services and facilities. Considering the above, the site is considered less favourable to the other preferred sites in the Halesworth and Holton area for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
Site 14 - Field, Saxon Way, Halesworth

Suggested Use: Housing
Site Area: 0.95

This site is a low-lying patch of land sandwiched between Saxons Way in the west and the New Reach in the east. The site is heavily overgrown and is located in an attractive area situated close to Halesworth conservation area.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Historic England cautioned that development on this site would impact upon the setting of the Gothic House, a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley Partnership was concerned that this site has access issues and that development of a care home would increase the age imbalance in the town.

Suffolk Wildlife Trust stated that this site may contain species and habitats of conservation value. Development should not be permitted unless it can be demonstrated that ecological development will not be harmed.

No comments submitted from developers or landowners in response to this site.

Members of the public stated that the site should not be developed because of flood risk and access issues. The neighbouring site at Dairy Farm was considered more appropriate.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The assessment did not identify any constraints that cannot be mitigated. There is not currently any road access to this site, however road access could be provided onto Saxons Way.

There are electricity lines and a sewer pipe crossing the site. The foul sewer network requires improvement prior to development.

The eastern half of the site lies within flood zone 2 and much of the site is also at a high risk of surface water flooding.

Development on this site could impact upon views of the conservation area and along the Blyth valley. Therefore development on this site would require careful and sensitive design. Construction of a junction close to an existing roundabout could cause road safety issues.

This site has the potential for both early and Anglo Saxon remains. Development should be accompanied by archaeological investigation which identifies impacts on remains and measures to manage those impacts, including preservation in situ.

The assessment identifies that this site has potential capacity for 18 dwellings at a density of 30 dwellings per hectare, which is in keeping with housing in surrounding areas. Most of the site cannot be developed due to flood risk.
Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on views of the conservation area and Blyth valley. Minor negative effects include the location of the site in source protection zone 2, the impact on biodiversity and the site being located in an area at risk from both flooding and surface water flooding.

Minor positive effects are associated with the accessibility from the site to services and employment. The site would also help to meet the housing needs of the local population.

Mitigation measures identified includes protection against flooding and removal of surface water flood risk from the site. Development should also retain trees and hedges on the site to mitigate landscape impact.

Conclusion

At least half of this site is at risk from flooding. There are sequentially preferable sites in the town at a lower risk of flooding. Meaning only half of the site is potentially suitable for development. However, development of this half of the site would have adverse impacts on the landscape and townscape and could harm the setting of the conservation area through loss of vegetation along Saxon’s Way. Therefore the site is not considered suitable for allocation in this Local Plan.
Site 32 - Land adjacent to The Oaks, Beccles Road, Upper Holton, Halesworth

Suggested Use: Housing
Site Area: 0.56

This site is isolated from other settlements and is situated next to the Beccles Road on a gently north facing slope. The site is surrounded by mature trees and hedges and there are houses both to the north and south. Surrounding countryside is flat and interspersed by hedgerows and field boundaries.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Historic England cautioned that development on this site would impact upon the setting of grade II listed Pastures Farm.

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial infrastructure needed to connect to the foul water network, which may not be economically viable. Full details are on the Council’s website.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.
Halesworth Town Council noted that this site is located in Holton.

Halesworth and Blyth Valley Partnership stated that development states that this site is located on a fast, narrow road outside of the village and with no close links to any other settlement.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

There is no pedestrian access to this site which is considered a significant negative effect and this issue could not be mitigated.

There are electricity lines running along the eastern and western edges of the site. Significant offsite infrastructure may be needed to connect this site to the foul sewer network. The foul sewer network requires improvement prior to development.

Parts of the site are at a low risk of surface water flooding.

This is an area of gently rolling countryside but landscape impact could be mitigated through sensitive development. The site is surrounded by trees and hedges on all sides.

The site is located on a busy road with no cycle lanes or pavements. Careful consideration will be needed about how this site can be connected to the road network.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include poor access to shops, services and facilities, the effects of flooding associated with climate change, the impact on the landscape and the loss of natural resources. Development would be isolated in the countryside and would not be related to any local settlement and so would have a negative impact on sustainable movement patterns.

A minor positive effect is that development would help to meet the housing needs of the local community.

The isolated location of this site means that landscape mitigation would be difficult.

**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 in this Local Plan.
Site 65 - Land north and east of Hill Farm Road Halesworth

Suggested Use: Housing

Site Area: 16.47

This is a large site flanking the eastern edge of Halesworth. Much of the site is overgrown and is set on the side of a hill which slopes down towards Holton in the east. The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of the Local Plan.
Site 73 - Land north of Moores Cottages, Upper Holton

Suggested Use: Housing
Site Area: 0.69

This is a flat site set on the eastern edge of a large arable field. There is a dense copse to the west and a row of cottages to the south. The site is accessed via a narrow lane.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Historic England cautioned that development on this site will impact upon Moat Farmhouse, which is a grade II listed building.

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Significant infrastructure needed to connect to the foul water network, which may not be economically viable.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.
Halesworth Town Council noted that this site is located in Holton but that Halesworth Town Council and Holton Parish Council should consider development together.

Halesworth and Blyth Valley Partnership noted that this site is located outside of the village but that there is an established community in the area. An innovative and environmentally friendly scheme could be considered.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

This site is accessed via a narrow lane and there is no pedestrian access, which could not be delivered without significant investment and would render the site unviable.

Significant offsite infrastructure is required to connect to and improve the foul sewer network, which may not be financially viable.

There is a minor risk of surface water flooding in the north and west of the site. Development would be visible from the west but landscape impact could be reduced if it aligned with the existing cottages.

Dense copse to the east could be a rich source of biodiversity. The Settlement Fringe Landscape Sensitivity Assessment identified this site as being of high sensitivity and moderate value, with a moderate capacity for development. This is a small site bordered by a tall hedge on one side and houses to the south. Although open to a large field to the west it is unlikely that this site contributes significantly to the landscape. The surrounding road network is narrow with few passing places and could become congested if there is a lot of new development. The road to the south is part of the National Cycle Network. The foul sewer network requires improvement prior to development.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of agricultural land, the lack of access to services, the impact of biodiversity and the impacts on sustainable movement patterns.

Minor positive effects are that proposed development has the potential to meet local housing needs.

There is uncertainty concerning the impact upon the historic environment. Landscape impact is also uncertain although it is likely that this would be a minor negative effect.

Tree and hedge planting to the west of the site might help to mitigate landscape effects.
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 in this Local Plan.
Site 76 - Land north of Sparrowhawk Road, Halesworth

Suggested Use: Employment
Site Area: 3.04

This is a flat site directly to the north of Sparrowhawk Road, close to the Bernard Matthews factory. The site itself is overgrown with tall hedges and trees along the western and southern edges. There is an aggregates breaking yard in the south east corner of the site, which is shielded by a further ring of hedgerow along its northern and western boundaries.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 1.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
Halesworth Town Council stated that this site is located one the border between Halesworth and Holton. Halesworth Town Council and Holton Parish Council would need to look jointly at the implications of development on infrastructure.

Halesworth and Blyth Valley Partnership stated that this site would be suitable for industrial development because of its close proximity to Sparrowhawk Road. It would be a good location for a household recycling centre and is located close to site 102.

Suffolk Wildlife Trust stated that this site may contain species and habitats of conservation value. Development should not be permitted on this site unless it can be demonstrated that it will not harm ecological value.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that this would be a good site for office or industrial use and that a development of this sort was necessary to the town.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints or impacts that cannot be mitigated. There are points of entry to the site from Sparrowhawk Road and a side road leading off to the north. All of these points of entry would require improvement prior to development. The site is set on a blind bend. There are no pavements but the cycle lane running along the southern edge Sparrowhawk Road, which serves the Spectra factory, could be extended to reach site 76.

Power lines cross the site from the southwest to the northeast and the foul sewerage network would require improvements to support development.

There are possible contamination issues from existing uses on this site.

There are pockets of surface water flood risk in the middle of the site.

The western part of this site is located within an area identified by the Settlement Fringe Landscape Sensitivity Study as being of high landscape sensitivity and moderate landscape value. This area has moderate capacity for development. The site is bordered by mature hedgerows which will be of landscape value and will help to shield development from the surrounding area. The site itself is flat and makes only a limited contribution to the landscape. The eastern half of the site is occupied by an aggregates breaking business. Employment development would have some impact which would need to be mitigated.

These may be a valuable habitat for biodiversity. This site clips the corner of the historic Holton Airfield. The site borders Sparrowhawk Road, which could accommodate significant traffic. However the highway
authority must be consulted about the potential increase in heavy goods traffic resulting from
development on this site. The foul sewer network requires improvement prior to development.

This site is located directly to the north of both Iron Age and Roman settlements. Development proposals
should be accompanied by archaeological investigation identifies the impacts of development and
suggests measures to manage those impacts. This includes measures for preservation in situ.

This site has the potential to deliver 3 hectares of employment land.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects are the loss
of agricultural land, the impact on biodiversity and development occurring in a source 1 protection zone.

Minor positive effects are that this development is located close to Halesworth and so would be close to
shops, services and medical facilities. It would also support economic growth, the rural economy and
sustainable patterns of movement. Creating employment opportunities would help to reduce levels of
depprivation.

There was uncertainty about the impact upon landscapes and townscapes due to the flat land surrounding
the site.

Hedges and trees surrounding the site should be retained in order to mitigate landscape impact.

Conclusion
This site is not considered suitable for allocation for employment use because it has poor accessibility to
the existing residential areas of the town.
Site 86 - Land off Saxons Way, Halesworth

Suggested Use: Housing
Site Area: 2.60

This site is situated on a banked area of higher ground, which overlooks a river valley and the Halesworth conservation area. An area of open space backed by residential development borders the site to the south and west.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a high encroachment risk to a water recycling centre; a sewer pipe crosses the site.

Historic England cautioned that development on this site could impact upon the setting of Gothic House, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
Halesworth Town Council stated that this site is of an unusual shape and so careful and original design would be needed to ensure that development is in keeping with the surrounding areas.

Halesworth and Blyth Valley Partnership noted that this site was part of the proposed route for the phase 2 of Halesworth Relief Road. It borders the London Road estate and Millennium Green and a carefully designed scheme could work very well with access via Bigod Close / Lansbury Road.

Suffolk Wildlife Trust stated that this site may contain species and habitats of ecological value. Development should therefore not be permitted unless it can be demonstrated that it will not impact upon ecological value.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that this site would be an appropriate location for development (provided it is not at risk from flooding) following the completion of development of Dairy Farm and Dairy Hill.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. There is an encroachment risk to the water recycling centre and a sewer pipe traverses the site. Close proximity to the water recycling centre raises concerns about odour. The site is located within the 400 metre buffer of the water recycling centre. Improvements to the foul sewerage network would also be needed to support development.

Part of the site is also at risk from surface water flooding. This site overlooks the River Blyth Flood Plain but landscape impact could be mitigated by only developing part of the site will low rise, well designed development.

Tall grasses and brambles could serve as a habitat for biodiversity. This is a small site and is unlikely to impact upon the surrounding road network.

There is potential for both early remains and remains of an Anglo Saxon settlement on this site. Development proposals should be accompanied by archaeological investigation which identifies the impacts of development and suggests a programme for managing those impacts.

The assessment identifies this site as having potential capacity for approximately 8 dwellings. Close proximity to the sewerage works would limit development to the road frontage.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect upon the landscape and townscape due to impact upon the conservation area and adjacent river valley. A minor negative effect was that development would be located on undeveloped land and would impact upon local biodiversity.
Minor positive effects are that development would be located within walking and cycling distance of shops, services, employment opportunities and medical facilities. It would also help to meet local housing needs and support sustainable patterns of movement because of its location close to employment opportunities.

Development would have to include measures to mitigate landscape impact, which could be difficult. Housing should also be resilient to flood risk and surface water flooding.

Conclusion
This site can only make a very limited contribution to new housing in Halesworth given the proximity to the sewerage treatment works and the awkward shape of the site. Development would do little to enhance the townscape and would detrimentally impact upon a sensitive landscape. Considering the above, the site is considered less favourable to the other preferred sites in the Halesworth and Holton area for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
Site 87 - Land on Bungay Road, Holton, Halesworth

Suggested Use: Housing
Site Area: 1.13

This site is a field sandwiched between Holton to the south east and valley farm to the north-west. The site is surrounded by hedgerows and is located within a picturesque valley, which slopes down towards Holton.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site may impact upon the setting of Gavelcroft, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Halesworth Town Council stated that this site is vulnerable to flooding, which requires thorough investigation.
Halesworth and Blyth Valley Partnership cautioned the scale of development may be too great (together with site 89) given previous issues with flooding.

Wellington Construction discussed scores given to the site in the sustainability appraisal. It stated that negative scores were attributed to:

A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
B) conserving natural resources;
C) reducing contributions to climate change and mitigating the effects.

Meanwhile the following categories were attributed positive scores: health and well-being; Improving access to key services and facilities; Meeting housing requirements for the whole community; Encouraging efficient patterns of movement in support of economic growth.

With regard to A) the site is infill between Valley Farm to the north-west and suburban development to the south east. A large residential property is situated on the opposite side to the north east. With regard to A), B) and C) it is likely that there will be negative scores because of its rural location but this will be the case for most sites submitted. There is the potential for strategic planting to minimise landscape impact and enhance future development. This site has no viability issues and could be delivered fairly quickly and this is important at a time when doubts about the deliverability of sites in Lake Lothing raised questions about the ability of the Council to meet its housing targets.

Members of the Public were concerned about the impact of flooding on the site, particularly after rain or snow.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity and a moderate landscape value, meaning that it has a moderate capacity to accommodate new development. This is a moderately sized site sandwiched between Valley Farm to the north-west and Holton to the south east, which makes a limited contribution to the wider landscape.

Road access from Bungay Road is suitable for farm vehicles only.

The eastern half of the site is at a high risk of surface water flooding and there are strips of land elsewhere on the site that are also at risk from surface water flooding.

This site is opposite to the grade II listed Gavelcroft and development could impact upon its setting.

The foul sewer requires improvement prior to development and electricity lines that cross the site will need to be accounted for.

This site has not been investigated for archaeological remains. Archaeological investigation would be required as part of any planning permission granted on this site.
The assessment has identified this site as having capacity for approximately 22 dwellings at a density of 20 dwellings per hectare. This takes into account its position with countryside on two sides and a rural settlement with low density dwellings to the south east.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development would be located agricultural land. Development on this site would have a minor negative effect on the landscape.

Minor positive effects relating to development on this site are that it would be located close to key services and facilities and employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

Retention of hedgerows bordering the site would help to mitigate landscape impact.

**Conclusion**

This site is located fairly close to shops, services, facilities and employment opportunities but there are competing sites which are better located. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton 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.
Site 89 - Land on Lodge Road, Holton, Halesworth

Suggested Use: Housing
Site Area: 1.42

This site is located on higher ground overlooking Bungay Road and Holton. The site is surrounded by tall hedgerows and trees and there is a plantation running along its north-west edge. The south west and south east edges of the site (next to Lodge Road) are currently being developed for a mixture of market and affordable housing.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England cautioned that development on this site will impact upon Gavelcroft, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact. Full details can be found on the Council’s website.
Halesworth Town Council stated that this site is located on Holton and suffers from flooding problems which will require thorough investigation.

Halesworth and Blyth Valley Partnership stated that the scale of development (together with site 87) may be too great given past problems with flooding in the area.

Suffolk Wildlife Trust states that this site, together with sites 8, 9, 44, 62, 81, and 82 forms a large block of land that may be of some value, especially for farmland species. Careful consideration of residential development on these sites is needed to ensure that it does not impact upon wildlife value on these sites.

Wellington Construction discusses scores given to the site in the sustainability appraisal. It states that negative scores were attributed to:

A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
B) conserving natural resources;
C) reducing contributions to climate change and mitigating the effects.

Meanwhile the following categories were attributed positive scores: health and well-being; improving access to key services and facilities; Meeting housing requirements for the whole community; Encouraging efficient patterns of movement in support of economic growth.

Development in this allocation would complement the 11 dwellings that are currently under construction and access could be gained via a y junction granted as part of the last planning permission. The previous permission underlines the fact that landscape impact will be minimal. Negative issues with regard to sustainability scores A), B) and C) will affect most rural allocations and strategic planting could be used to minimise landscape impact. This site offers the potential for 35 dwellings in a sustainable location. The LPA recognises that greenfield development is inevitable as it tries to meet its housing targets. This is particularly the case given the stalled development of sites in Lowestoft. Site 89 and those like it are important because they are available and deliverable.

Members of the Public were concerned that development on this site would increase creeping suburbanisation and there was concern about the risk of surface water flooding on the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment has not identified any constraints or impacts that cannot be mitigated. The section of the site which fronts on to Lodge Road is being developed for housing, however, access to the remainder of the site has been provided for farm vehicles and this could serve as the point of access for future development.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity and a moderate landscape value, meaning that overall it has a moderate capacity to accommodate new development. The eastern edge is next to a sensitive urban fringe. Site 89 is located in a prominent...
position, although some of it is shielded by trees and a plantation. The impact of further development on this site would be lessened by the development taking place in the south and east of the site.

There is a pumping station to the south of the site. The foul sewerage network will require improvements to support development.

The site slopes gently towards Bungay and is located in an area of picturesque landscape. Sensitive design and landscaping is needed to keep landscape impact to an acceptable level. Hedges and trees surrounding the site, particularly along its eastern edge, could support biodiversity.

The site is located in close proximity to the Holton conservation area.

The assessment identifies this site as having potential capacity for approximately 15 additional dwellings at a density of 20 dwellings per hectare. This density is comparable to that found in the development currently being built in the south east of the site.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land.

Minor positive effects are that development would be located close to shops, key services and employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

Retention of existing hedgerows surrounding the site would help to mitigate landscape impact.

Conclusion
Out of all the sites considered in Holton, this site is the most preferable given that development is already taking place on the site and would therefore have less impact on the landscape and townscape. Any potential impact on the setting of the nearby listed building should be able to be mitigated through design. Any risk of surface water flooding will need to be assessed at the planning application stage and mitigation measure identified. Considering the above site is allocated in the First Draft Local Plan for 15 dwellings.
Site 102 - Land south of Sparrowhawk Road, Halesworth

Suggested Use: Employment
Site Area: 27.27

This is a large site which is located between Sparrowhawk Road in the north and Fair View Road in the south. The site is an area of countryside that slopes downwards towards Holton. Much of the site is made up of pasture, some of which is used to keep horses, but there is a farmhouse in the middle as well as a dense copse of trees.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has undertaken a high level analysis which shows that this site is located within source protection zone 1.

Historic England cautioned that development on site 102 could have an impact on Archers Cottage, which is a grade II listed building to the east of the site.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Halesworth Town Council stated that this site is potentially a good location for industrial development. However its location on the edge of Halesworth and Holton means that Halesworth Town Council and Holton Parish Council must look at the two sites together.

Halesworth and Blyth Valley Partnership stated that employment land is needed in Halesworth but cautions that development included measures to control traffic movement and protect from flood risk.

National Grid has informed the Council that an intermediate high pressure gas main runs under the site.

No comments submitted by developers or landowners in response to this site.

Members of the Public were concerned that without knowing the details of the proposed building works and their duration, the number of people accessing the site during construction and once in use and the hours of operation it would not be possible to form an accurate judgement. One respondent felt that the nearby Holton airfield, which is already used for employment uses, would be a more suitable location for further development. However another thought that the location would be suitable because of its proximity to the main road and the provision of employment opportunities that would reduce the need for people to commute. Careful design (including leaving space near the housing) would be needed to minimise impact on residents and the right of way of the edge of the site must be left intact.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

There assessment did not identify any constraints or impacts that cannot be resolved. There is a narrow track leading from the farmhouse to Fair View Road but this will require improvements, particularly better visibility splays, prior to development.

Electricity lines cross the site from east to west across the site, along the southern edge of the site and connecting the farmhouse. The foul sewer network requires improvement prior to development.

Surface water flooding is possible across the east and southeast of the site. A small stream runs through the site crossing the area of the farmhouse.

The Settlement Fringe Landscape Sensitivity Assessment identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for accommodating new development. This site is large and sloping with a prominent ridgeline in the north east corner of the site and a sensitive urban fringe along its southern edge. The size and sloping character of this site means that it does make a significant contribution towards the local landscape.

The landscape tilts southwards towards Holton. The site is bordered by mature trees which also run across the site. There is a copse of trees towards the northeast of the farmhouse. Development in the centre, north and east of the site would be exposed in the landscape and poorly connected to the existing...
settlement. Development along the southern and western edges of the site would have less of an impact, particularly if developed alongside site 13.

Hedges within the site could support biodiversity as could the copse next to the farmhouse. Site 13 to the west is heavily overgrown and so could be of biodiversity value and there is a county wildlife site to the north west of site 102.

Holton Airfield clips the site and there is a historic farmhouse in the middle of the site. Fair View Road is narrow with no pavements and may be too narrow to accommodate commercial traffic. It contains a national cycle route but there is no designated cycle lane. The junction with Norwich Road may require improvement. Sparrowhawk Road to the north may also require a point of access if the entire site were to be developed. Commercial uses and traffic accessing the site along Fair View Road could disrupt nearby residential development. For this reason entry from the north along Sparrowhawk Road might be better.

There are remains of Iron Age and Roman settlement to the north and a Roman road to the north west. Development proposals should be accompanied by a programme of archaeological investigation which identifies the impacts of development and suggests measures to manage those impacts.

Development on this site could deliver 10 hectares of employment land. One third of the site could be developed along its southern and western edges.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the impact on the landscape and historic environment, the impact on biodiversity the site being located within source protection zone 1 and the loss of agricultural land.

Minor positive effects are that development would be located close to nearby residential areas and services. This site would also encourage sustainable patterns of movement, support the rural economy and help to reduce levels of deprivation.

Retention of trees and hedges would help to mitigate landscape impact.

**Conclusion**

The area of this site exceeds the amount of employment land which is likely to be needed during the life of the Local Plan in Halesworth. The size of this site and its position on a slope means that it would have an effect on the landscape but this could be mitigated if development were located only at the western end of the site. Road access for commercial vehicles could also create issues with noise and odour for nearby residents. Therefore, the site is not considered suitable for an employment allocation in this Local Plan.
Site 103 - Land south of The Street, Holton (adjacent to 36 Holton Road, Halesworth)

Suggested Use: Housing
Site Area: 0.85

This site is an open field located next to a sharp bend in the Holton Road. The site is surrounded by hedges along its north and eastern sides and a garden centre borders the site to the south and west. There is a plantation to the south of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewage pipe crossing the site.

The Environment Agency undertaken a high level review of site 103 and has identified that it is located in source protection zone 2.
Historic England cautions that the location of this site could impact upon both listed buildings and a conservation area. This site could impact upon the Holton Conservation area as well as The Homestead, Myrtle Cottage and Millside Cottage, which are grade II listed buildings.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Halesworth Town Council notes that this site is located in Holton and the town council would need to consider development on this site in tandem with Holton Parish Council.

Halesworth and Blyth Valley Partnership states that housing on this site should only be considered if it is accompanied by improvements to the corner of the B1123 and junction with the B1124.

No comments submitted by developers or landowners in response to this site.

Members of the Public were concerned that the site suffered from surface water flooding and that there was no way of removing excess water from the site. It was also thought that the site was too dangerous for housing (no reason was given but it was probably because of the blind bend and nearby road junction to the east).

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any issues or effects which could not be mitigated by development.

There is a sewer pipe traversing the site and a pumping station to the south of the site. Foul sewerage improvements have also been acknowledged as necessary for development.

The site is directly adjacent to an area of fluvial flooding. The eastern part of the site is at a high risk of surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of a high landscape sensitivity study, a moderate landscape value and having a moderate capacity to accommodate development. A plantation to the south of this site would reduce the impact of development on the landscape. Development would increase the coalescence between Halesworth and Holton. Development would take place in an area on the edge of the settlement and careful design would be needed to minimise landscape impact.

The site is on the edge of the Holton conservation area and careful design is needed to minimise impact on the local historic environment. The site is accessed by the B1123, which links Halesworth to the A12. The foul sewer network will require improvements prior to development.

There is potential for early settlement remains on this site. Planning permission should require a programme of archaeological investigation.
This assessment has identified that this site has the capacity to accommodate approximately 17 dwellings at a density of 20 dwellings per hectare. This takes account of the suburban character of nearby housing and the site’s edge of settlement location.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identified a significance negative effect upon the landscape. Development on this site would be screened by a plantation to the south but development on this site would fill in one of the last gaps between Halesworth and Holton, which would increase the coalescence between the two settlements. Minor negative effects are that development will result in the loss of undeveloped land.

Minor positive effects are that development would be located close to shops, services and employment opportunities and will encourage sustainable patterns of movement. It would also help to meet the housing needs of the local community.

There is uncertainty regarding the impact of development on the historic environment because the site is close to the Holton conservation area and several historic buildings.

Development should retain existing trees and hedges to mitigate landscape impact. There should also be careful attention to design and landscaping.

Conclusion
This site is not considered appropriate for allocation in this Local Plan because development of the site would increase coalescence between Halesworth and Holton.
Site 106 - Land to north of 34-48 Old Station Road, Halesworth

Suggested Use: Housing
Site Area: 1.36

This site faces north and is in a prominent location on the edge of Halesworth. The site now has planning permission for housing therefore the site will not be considered any further for allocation as part of the Local Plan.
Site 115 - Land to the west of Halesworth (Block 1)

Suggested Use: Housing
Site Area: 14.40

This site is a large field on the south west edge of Halesworth. The landscape is open and the site is visible from the south and from Walpole Road.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that the proposed development will impact upon the setting of listed buildings: grade II listed Cookley White House to the south and grade II listed The Grange to the south east.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Halesworth Town Council stated that sites 115 and 116 extend beyond the natural edge of the town. Walpole Road is could not support a development of this size. Together these sites would deliver 980 new...
dwellings and education and healthcare facilities are inadequate to support this. Such a development would be very unpopular with local people and the town council.

Halesworth and Blyth Valley Partnership stated that sites 115 and 116 together will deliver 980 houses, which is too much for existing infrastructure. These two sites are situated outside of the town envelope, which should end at Duke’s Drive.

The landowner referred to the sustainability appraisal noting that the only negative points relate to:
   A) conserving and enhancing the quality and distinctiveness of landscapes and townscapes;
   B) reducing Contributions to Climate change and mitigating the effects;
   C) conserving natural resources.
Point A can be resolved through the provision of a strategic landscaping scheme and the inclusion of attractive open space. With regard to B and C the scale of development on this site and its neighbour (site 116) means that infrastructure can be designed into the scheme to mitigate any impacts. The site is in sole ownership and could be delivered within the next five years. Development on this site would form a natural extension to the town and it is only 14.8 miles from Sizewell, which is expected to see significant employment growth in the near future. It may not be preferable for the whole site to be developed but nonetheless it could accommodate considerable development being both accessible and serviceable.

Members of the Public were opposed to development on this site and raised the following issues:
- major impact upon the landscape to the south west of Halesworth;
- moor of agricultural land;
- increased flood risk;
- sewage network is already at capacity and so cannot support further development
- increased traffic congestion;
- pressure on already stretched healthcare and educational services;
- site is remote from schools, shops, employment and other services and this will increase private car use;
- Halesworth is a 45 minute drive from the nearest hospital in Gorleston;
- town centre shops would be unable to cope with development on this scale;
- the site is a valuable wildlife habitat which could be harmed by the proposed development;
- Halesworth lacks employment opportunities to support an increase in the working age population;
- without jobs to support the additional population many of these houses will be bought by retired people, which will place further strain on local services.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints or impacts which cannot be mitigated. Although there is currently no road access this could be provided onto Walpole Road.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity to accommodate new development. There is a key
ridgeline located to the north west of this site. The area is made up of vast arable fields. The size and visibility of this site means that it does make a significant contribution towards the surrounding landscape.

The foul sewer network will require improvement prior to development.

Parts of the site are at risk from surface water flooding.

The site is located in a highly prominent position but landscape impact could be mitigated through careful design.

Large scale development could potentially impact upon the transport and road network.

The site has a high potential for archaeology.

The assessment identifies this site as having the potential capacity to accommodate 288 dwellings at a density of 20 dwellings per hectare. Lower development density would be necessary to help to mitigate landscape impact and to remain in keeping with existing residential development to the north.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because it would lead to the loss of grade 2 and 3 agricultural. Development would also be in a prominent location that would have a significant negative effect upon the landscape.

Minor positive effects were that development will be in an accessible location for services and will encourage sustainable patterns of movement. The site would also help to meet local housing needs.

This site is in a highly prominent location and adequate mitigation would be difficult.

**Conclusion**

This site is in a prominent location and would have a greater negative effect upon the landscape than some alternative sites. It is also further from the town centre and educational facilities than other sites and is partially located on high grade agricultural land. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
Site 116 - Land to the west of Halesworth (Block 2)

Suggested Use: Housing
Site Area: 18.48

This site is located on the edge of the Blyth valley. This is a large site which slopes downwards towards the river to the south east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

The Environment Agency has carried out a preliminary desktop study and has identified that this site is located within source protection zone 2.

Historic England cautioned that development on this site will impact upon the setting of two grade II listed buildings: Cookley White House to the south west and The Grange to the south east.
Suffolk County Council Archaeology noted that the development of this site would have a ‘Red/Amber’ impact with high potential significance and a large allocation.

Halesworth Town Council stated that sits 115 and 116 extend beyond the natural end of the town. Walpole Road could not support a development of 980 houses and medical and educational facilities cannot support the proposed scale of development. Development of this site would be very unpopular with local residents and the town centre.

Halesworth and Blyth Valley Partnership stated that sites 115 and 116 extend beyond the envelope of the town, which should end at Duke’s Drive. Existing infrastructure will not be able to support development of this scale.

The landowner noted that the sustainability appraisal exercise gave the same results for sites 115 and 116 and so their response to each was the same. Given the scale of the site it was accepted that developing the entire site might not be preferable but its availability and access meant that it would be important to the future growth of south west Halesworth.

Development on this site would form a natural extension to Halesworth. It is noted that the southern edge of the site is prone to flooding but this area need not be developed. Instead it could be used for landscaping or open space.

Members of the Public were concerned that development on this site would place excessive strain on local services:

- an influx of younger families would place pressure on local schools;
- the site is located at some distance from health facilities in the north of the town;
- the town is remote from the nearest major hospital;
- shops would struggle cope to the additional demand;
- there are inadequate job opportunities to support new development;
- lack of facilities for teenagers will lead to antisocial behaviour.

More generally there was concern that development on this site would:

- pose a threat to local wildlife and that it would increase the risk of flooding;
- result in the loss of productive agricultural land;
- have a major impact upon the character and landscape of the area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. At the moment there is no road access but access could be provided onto Walpole Road.

A sewer pipe traverses the site. The foul sewer network will require improvement prior to development.
The Settlement Fringe Landscape Sensitivity Assessment identifies this area as having high landscape sensitivity, a moderate value and a moderate capacity to accommodate new development. The site gives very good views towards the Blyth Valley and development along its urban edge would require careful design and landscaping. The site is also visible from the surrounding area and makes a significant contribution towards the landscape. The site borders the river Blyth to the north east and there is a risk from surface water flooding to the south east. There area strips of land at risk from surface water flooding running across the site. Development would be in a prominent location but landscape impact could be overcome through sensitive design. Large scale development could impact upon the surrounding road and transport network.

This site has the potential for remains of Anglo Saxon remains and possibly a cemetery. Development proposals should include a programme of investigation which should identify remains and the impacts of development. It should also suggest measures to manage those impacts.

The assessment identifies this site as having the potential capacity to deliver 333 new dwellings at a density of 20 dwellings per hectare. Lower density development is needed to help mitigate landscape impact and too be in keeping with existing development to the north east. It also allows for a 10% buffer next to the river.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because it would result in the loss of grade 2 and 3 agricultural land. Development would also be in a prominent location that could have a significant negative effect upon the landscape and townscape. A minor negative effect is that the site may impact on Anglo Saxon remains.

Minor positive effects are that development would be located close to shops, services and facilities, and employment opportunities and will encourage sustainable patterns of movement. The site would also help to meet local housing needs.

The prominent location of this site would mean that it would be difficult to mitigate landscape impact. Development on the eastern edge of this site would also have to be resilient to surface water flood risk.

**Conclusion**

Similar to site 115, this site is in a prominent location and would have a greater negative effect upon the landscape than some alternative sites. It is also further from the town centre and educational facilities than other sites and is partially located on high grade agricultural land. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
Site 121 - Land west of Moores Cottages, Upper Holton

Suggested Use: Housing
Site Area: 0.33

This is a small site in the eastern corner of a large arable field. There is a tall hedge along part of the southern boundary and a row of cottages borders the site to the west.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial infrastructure is needed to connect to the foul water network, which may not be economically viable.

Historic England cautioned that development on this site would potentially impact upon the setting of Moat Farm House, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.
Halesworth Town Council stated that this site is located in Holton and that it would need to consider any future development proposals in conjunction with Holton Parish Council.

Halesworth and Blyth Valley Partnership noted that this site is outside of the settlement limit but that the area contains a local community. A well designed, environmentally friendly development to meet local need could be considered.

No comments were submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
This site is accessed via a narrow lane and there is no pedestrian access, which could not be provided without significant investment which would render the site unviable. There are currently few passing places, as well as no pavements or separate cycle lanes.

Offsite infrastructure would be needed to connect this site to the foul water network, which might not be viable.

High surface water flood risk is located in the middle of the site.

The Settlement Fringe Landscape Sensitivity Assessment identified this site as being of high sensitivity and moderate value, with a moderate capacity for development. This is a small site bordered by a tall hedge on one side and houses to the east. Although open to a large field to the west it is unlikely that this site contributes significantly to the landscape.

Development on this site would be highly visible from the northwest but this could be mitigated through careful design and aligning development with the existing Moores Cottages.

Mature hedgerow bordering the site could act as a habitat for biodiversity.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development on this site would lead to the loss of agricultural land, would impact upon local biodiversity and would lack access to services and would not encourage sustainable movement patterns.

The one minor positive effect is that development will meet the housing needs of the local community.

There was uncertainty about the impact upon the landscape but it is thought that any impact is likely to be a minor negative effect.
Tree and hedge planting to the south and west of the site will help to mitigate landscape impact.

**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 in this Local Plan.
Site 122 - Land west of Norwich Road, north of Old Station Road, Halesworth

Suggested Use: Housing
Site Area: 5.28

This site is a valley that extends westwards between residential development on Old Station Road and Broadway Drive. The eastern half of the site is a large open field and the western half of the site is heavily overgrown. The site is surrounded by hedgerows and is not easily visible from the public road.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development will impact upon the setting of Wissett Place, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Halesworth Town Council was concerned that this site, together with sites 106, 140 and 141 will deliver a
total of 237 houses and that drainage would be inadequate. Wissett Road is already heavily used and could not adequately serve the resulting additional traffic. This would increase safety concerns for the pupils of the Edgar Sewter School. Healthcare, educational and sewerage network would also all need considerable improvement.

Halesworth and Blyth Valley partnership cautioned that development on this site would encroach into the gap between industrial and residential development and there are also major drainage issues on the site.

Hopkins Homes reiterated its claim in the Call for Sites about the suitability of the site for housing and open space. The site is sustainably located, within walking distance of the town centre and railway station and is surrounded by the built environment. The site is 4.9 ha in size and can accommodate 150 dwellings. Access is via the A144 and pedestrian access is possible via the public open space on Old Station Road.

Members of the Public considered this site to be in a reasonably sustainable location that was close to the town centre. Development here would also reduce the need to develop land in the strategic gap or on large sites to the south west of the town. Housing development here would make the town more compact and sustain the town centre.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints which cannot be mitigated. Access to the site can be provided via Broadway Drive or Old Station Road.

Electricity lines cross the site. The foul sewerage network would need improvements to support development.

There are areas of low to medium surface water flood risk on the site.

The Settlement Fringe Landscape Sensitivity Study identifies this site as having high landscape sensitivity and value and a low capacity for development. It is a large site but one that is fairly enclosed in the landscape and not easily visible from the surrounding area. This reduces its contribution to the surrounding landscape. There is low to medium surface water flood risk across the area. This site is heavily overgrown in the western half and a close cropped arable field in the eastern half. The site is surrounded by tall hedges and an area of shrubs and trees divides the eastern and western half of the site.

Hedgerows and trees on the site have the potential to support biodiversity.

The site acts as a buffer between residential development to the south and industrial uses to the north. A small buffer zone should be maintained to separate employment land from new residential development.

The site has a high potential for archaeology.
The assessment identifies this site as having potential capacity to develop approximately 118 new dwellings at a density of 25 dwellings per hectare. This includes a 10% buffer next to the employment area to the north.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects arising from development on this site. Minor negative effects are that development would lead to the loss of agricultural land and harm local biodiversity. Development would also have a minor negative effect on the landscape.

Minor positive effects are that development would be located near services and facilities and will encourage sustainable patterns of movement. It would also help to meet local housing needs.

There is an unknown impact on the historic environment associated with this site, but this is likely to be negative.

Sensitive design and the retention of trees and shrubs on the site would help to mitigate landscape impact.

**Conclusion**

Site 122 is located in an area of high landscape value but is contained in the landscape by existing development on three sides and the railway line to the west. The site is close to shops, services and employment opportunities. However, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan which are either closer to the town centre, have more benign impacts or deliver wider benefits. These 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.
Site 140 - Site to the rear of 51 Old Station Road, Halesworth (1)

Suggested Use: Housing
Site Area: 0.51

This site is set on a north facing slope on the edge of Halesworth. The site is bounded by mature hedgerows and is currently made up of pasture.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of Wissett Hall, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

No comments were submitted by town or parish councils in response to this site.
Halesworth and Blyth Valley Partnership stated that sites 140, 141 and 106 will together place too much pressure on Wissett Road. The junction between Wissett Road and Norwich Road is the narrowest in Halesworth and this will increase traffic dangers for pupils at the Edgar Sewter Primary School.

No comments submitted by developers or landowners in response to this site.

Members of the Public stated that development on this site would remove the need to develop land in the strategic gap or on the large sites on the south west edge of the town. Development in this location would make the town more compact and also support the town centre.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. The foul sewer network will require improvement prior to development.

There is a railway line to the east of the site, which could create issues with noise.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of high landscape sensitivity, a high landscape value and having a low capacity for accommodating new development. The southern edge of the site is bordered by a sensitive urban fringe. This site is located on the southern face of a valley in an area of fields and so is visible in the landscape. Its contribution to the surrounding landscape is therefore significant.

There is a risk of surface water flooding along the north and western edges of the site.

This is a north facing site in a valley surrounded by mature hedges and trees. Landscape impact could be mitigated by sensitive low rise development. Trees and hedges surrounding the site have the potential to support biodiversity.

Entrance to the site is located at the end of Old Station Road, which is a narrow cul-de-sac, which could require improvement prior to development.

There is strong potential for archaeological remains on this site. Proposals for development should be accompanied by a programme of archaeological investigation.

The assessment has identified this site as having the potential capacity to accommodate 10 new dwellings at a density of 20 dwellings per hectare. A lower density is needed to reduce landscape impact.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the loss of agricultural land. Development would be visible in the landscape but it would only have a minor negative effect.
Minor positive effects are that development would be located in close proximity to services and employment, and will encourage sustainable transport patterns. Proposed development would help to meet local housing needs.

A small development with a sensitive design would help to mitigate landscape impact.

**Conclusion**

This is a small site which is well contained within the landscape and, development is unlikely to have any significant negative impacts. The site is therefore allocated for 10 dwellings under Policy WLP4.3 of the First Draft Local Plan.
Site 141 - Site to the rear of 51 Old Station Road, Halesworth (2)

Suggested Use: Housing
Site Area: 1.18

This site is a south facing field that faces site 140 to the south. This site is bounded on all sides by mature trees and hedges and the railway line bounds the site to the east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

No comments were submitted by town or parish councils in response to this site.

No comments were submitted by other organisations in response to this site.

No comments submitted in response to this site.
Members of the Public stated that development on this site would remove the need to develop land in the strategic gap or on the large sites on the south west edge of the town. Development in this location would make the town more compact and also support the town centre.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The assessment did not identify any constraints that cannot be mitigated. Road access would have to be provided via sites 106 or 140.

The foul sewer network requires improvements prior to development.

A railway line runs to the east of the site which could create issues with noise. However the site is compatible with other neighbouring uses.

The Settlement Fringe Landscape Sensitivity Study identifies this area as being of high landscape sensitivity, a high landscape value and having a low capacity for accommodating new development. The southern edge of the site is bordered by a sensitive urban fringe. Development on this site would form an incursion into the countryside but landscape impact could be mitigated through low density development and sensitive design.

There is a moderate to high risk of surface water flooding in the middle of the site. The site is on the northern side of a valley and is not currently connected to the existing settlement.

Development could extend the built area on neighbouring sites 106 and 140 and sensitive design and landscaping could mitigate landscape impact.

Surrounding hedgerows and the railway embankment could serve as wildlife habitat.

There is strong potential for archaeological remains on this site. Proposals for development should be accompanied by a programme of archaeological investigation.

The assessment identifies this site as having potential capacity for 24 new dwellings at a density of 20 dwellings per hectare. This would be consistent with development densities on site 140 to the south and existing residential area along Old Station Road. It would also help to mitigate landscape impact.

*Summary of Draft Sustainability Appraisal*

The draft Sustainability Appraisal identified a significant negative effect upon the landscape because of the site’s prominent location.

Minor negative effects are that development would result in the loss of agricultural land and would impact upon local biodiversity.
Minor positive effects are that development would be located close to shops, services and facilities. It would also be close to employment opportunities, which would support sustainable patterns of movement. Development would also help to meet local housing needs.

There is uncertainty regarding the impact of development upon historic remains on the site.

Low density development and sensitive design would mitigate landscape impact.

**Conclusion**

Development on this site would form an unnatural extension into the countryside in a sensitive landscape. The site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
**Site 148 - The Sawmill, Sandy Lane, Holton, Halesworth**

Suggested Use: Housing  
Site Area: 1.37

This site is the site of a former sawmill which is located close to the historic heart of Holton as well as sites of biodiversity value. The site itself is set in a depression with a wooded embankment to the south.

**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency identified this site as being located within source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of the conservation area and the following grade II listed buildings: Montagu Cottage; K6 telephone kiosk; Holton Mill; Millside and Myrtle Cottage.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.
Halesworth Town Council noted that this site is located in Holton and that Halesworth Town Council and Holton Parish Council should look together at proposals on this site.

Halesworth and Blyth Valley Partnership stated that this site will be difficult to develop because of the restrictions on it. This site is part of an area of natural open space in Holton.

The landowner stated that the number of houses suggested for the site (5) is too low and that 45 – 55 houses would be more appropriate for a house of this size. However the landowner is open to discussion about the final use of the site and would welcome any feedback from the Council.

The landowner’s agent stated that this site is located just outside the settlement boundary of a larger village. Development on this site would be in a sustainable location and would help to support the village and local services. Historically the site has been used as a sawmill, but more recently for storage and distribution with ancillary retail use (ref. DC/10/1572/FUL). Development of this site would therefore be in line with local and national policies, which seek to redevelop previously developed land in preference to greenfield sites. It would also protect more sensitive parts of the landscape from development.

Point 11 of the sustainability appraisal matrix identifies the site as agricultural land but contradicts point 14, which states that development of this site would result in the loss of an employment site. This site has not been in agricultural use for more than 200 years – a point recognised by the Council in the committee report in application DC/15/0871/FUL. Although the site has permission for employment uses these have never been implemented and so its development would not result in the loss of employment land.

This site is well screened and contained in the landscape and so would not impact upon the landscape and it would also not erode the strategic gap. Sites 65 and 87 are both located within the strategic gap, which was identified in the Green Infrastructure Strategy as important to the character of both communities and so should be protected. While this site is located adjacent to the Holton conservation area sensitive development would not harm the conservation area or views into or out of it. Sensitive development would not impact upon either the Holton Pit Site of Special Scientific Interest or the nearby County Wildlife Site.

The site is available immediately and could be developed within 3-5 years. The landowner wishes to release the site without delay. Development of the site for residential uses would be viable taking into account requirements for CIL payments and affordable housing.

In conclusion the site is deliverable, viable and available. Development of the site for approximately 20 dwellings would constitute sustainable development. Environmentally it is the least sensitive site put forward on the fringes of Holton, being located on brownfield land outside of the strategic gap, which is well enclosed in landscape terms. Local services are easily accessible on foot and there are good transport links. Development would bring underused brownfield land back into use and would support local services and facilities. It would deliver much needed housing for local people and a policy-compliant level of affordable housing.

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Members of the Public stated that it should continue to be used for its existing light industrial use. There was also concern that the site and Holton village were vulnerable to flooding.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. Access is currently too narrow and input from the Highway Authority will be needed prior to development. Road access issues will have to be overcome prior to development taking place.

An electricity line runs across part of the site. The foul sewer network will require improvement prior to development.

There is possible contamination from employment uses that took place in the past on this site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity to accommodate new development. This site is situated in a depression in the landscape, which is bordered to the south by a steep and overgrown bank. The site is next to designated wildlife sites but is situated away from public roads and as a result and its contribution to the surrounding landscape is limited.

The site is located in source protection zone 2.

The southeast corner of the site is susceptible to surface water flooding.

The site is adjacent to a site of special scientific interest and a county wildlife site, which contains a pond. A hedge borders part of the site and there are trees on the embankment to the south of the site. This site is adjacent to the conservation area and is part of a historic settlement area.

The assessment identifies this site as having the capacity to deliver 27 dwellings at a density of 20 dwellings per hectare. This takes account of the site’s rural location on the edge of a village near to a conservation area and will help to mitigate landscape impact.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were the loss of employment land and the loss of agricultural land. Development on this site would have a minor negative landscape and biodiversity effect.

Minor positive effects were that development would be located close to services and employment, would reuse vacant land and will encourage sustainable movement patterns.
There uncertainty regarding the impact of development upon the conservation area. The site is enclosed in a depression in the landscape but the site is close to the conservation area so minor negative effect is possible.

Mitigation measures will be needed to protect the neighbouring county wildlife site and site of special scientific interest.

**Conclusion**

This site is enclosed in the landscape and development would have a minimal impact upon the landscape. While the site is located close to shops, services and employment opportunities in nearby Halesworth there are other sites which are located closer to Halesworth and so would be more sustainably located. Other sites in Holton have a lesser impact on the landscape. This site is a former employment site and so may suffer from contamination issues, particularly as it is located within source protection zone 2. The site also suffers from poor road access. Therefore, the site is considered less favourable to the other preferred sites in Halesworth and Holton for residential development allocated in the First Draft Local Plan. These preferred sites cumulatively deliver more than sufficient housing for Halesworth and Holton under the strategy outlined under Policy WLP1.1. As such the site is not considered suitable for allocation in this Local Plan.
Site 151 - Town Farm 1, off Harrisons Lane, Halesworth

Suggested Use: Housing
Site Area: 1.54

This site is a flat field enclosed by the former middle school site to the west and south. Harrisons Lane borders the site to the north and there is a large arable field to the east. Site 151 is surrounded by hedgerows.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of grade II listed Town Farm.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.
Halesworth Town Council stated that this site, along with sites 152, 153 and 161, should be allocated for sports and recreational facilities.

Halesworth and Blyth Valley Partnership stated that this site should be designated for sport and recreational facilities.

No comments were received from developers or landowners in response to this site.

Members of the Public were concerned that development on this site would increase pressure on roads, shops, schools and healthcare facilities. It will also increase the risk of flooding. The site was too far from shops and services in the town centre, which will increase traffic on the roads. Development would lead to the erosion of the strategic gap and the creation of urban sprawl. This site is currently productive farmland and so should not be developed. There were preferable sites for development on the northern and western edges of the town.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that cannot be mitigated. The water recycling centre has capacity but the foul sewer network will require improvement prior to development.

There is a small risk of surface water flooding in the south west corner.

This is a flat site surrounded by trees and hedges. Development on this site would be exposed to the landscape to the east. The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for the landscape to accommodate new development. Site 151 is located next to a sensitive urban edge but is flat in the landscape and surrounded by hedges. It is not visible from the east and its contribution to the landscape is minimal.

Trees and hedges surrounding the site could support biodiversity.

Junctions with Norwich Road may also require improvement if the site is developed.

Operations at Town Farm could create issues with noise and odour.

The site has a high potential for archaeology.

The assessment identifies this site as having potential capacity to accommodate 46 new dwellings at a density of 30 dwellings per hectare.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal did not identify any significant effects arising from development on this site. Development would have a minor negative effect on the landscape and on natural resources.
Minor positive effects were that development would be located close to services and employment which would also encourage sustainable transport methods. The site could also help meet local housing needs.

Use of landscaping and tree planting would be needed to mitigate landscape impact, particularly along the eastern boundary.

**Conclusion**

This site is enclosed by playing fields to the south and west and residential development to the north. It is flat and reasonably enclosed in the landscape. Residential development would be unlikely to harm the landscape and would be located close to services, facilities and employment opportunities. This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.
Site 152 - Town Farm 2, off Harrisons Lane, Halesworth

Suggested Use: Housing
Site Area: 5.45

This site is a large arable field that slopes downwards towards Holton to the east. The site is surrounded by mature hedgerows on all sides.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site will impact upon the setting of grade II listed Town Farm.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Halesworth Town Council believed that too many houses have been proposed on this site and that it would encroach upon the strategic gap.
Halesworth and Blyth Valley Partnership stated that the western part of the site should be developed for sport and recreational uses; the eastern part should be used to retain the strategic gap between Halesworth and Holton, as detailed in the Green Infrastructure Strategy.

No responses were received from developers or landowners in response to this site.

Members of the Public drew attention to drainage problems on the site and were concerned about the increased risk of surface water flooding. There was also concern that the location was remote from the town centre, which would encourage increased car use. Development of the site would reduce the size of the strategic gap and create urban sprawl. This site is part of a network of fields and hedges that separates Halesworth from Holton and is important to the character of the area. The site is bordered by a green lane, or ‘loke’, which is a distinctive landscape feature. In addition the site was identified as productive agricultural land and so should not be developed.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. Road access could be provided directly from Harrisons Lane or via Town Farm.

Electricity lines run across the eastern part of the site. The foul sewer network requires improvement prior to development.

There are areas of surface water flood risk in the middle and northwest of the site.

The Settlement Fringe Landscape Sensitivity Study identifies this area as having high landscape sensitivity, a moderate landscape value and a moderate capacity for the landscape to accommodate new development. This landscape area is a remnant of ancient landscapes and field patterns. This site is situated on a key ridgeline and is quite visible from public roads. Its contribution to the wider landscape is therefore significant.

Development would be in a highly prominent location but this could be mitigated through sensitive design and landscaping.

Hedges and trees surrounding the site have the potential to host biodiversity.

Harrisons Lane is narrow and does not have a designated cycle path, although it is part of a national cycle route. There is also a pavement running along the southern edge of the road. The junction between Norwich Road and Fair View Road may also require improvement.

There is the possibility of noise and odour issues from Town Farm to the south.
This is a large site in an area of high archaeological potential. Development on this site should be accompanied by a programme of archaeological investigation to identify archaeological remains, development impacts and measures to manage impacts and preserve archaeological remains.

The assessment has identified this site as having the potential capacity to accommodate 110 dwellings at a density of 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land and the landscape impact.

Minor positive effects from development on this site are that it would be located close to services and employment and will encourage sustainable patterns of movement. The site would also provide housing to help meet local needs.

Proposed development should include tree planting and landscaping to mitigate landscape impact.

**Conclusion**

This site would form an incursion into the countryside but mature trees and hedges surrounding the site would help to reduce its impact on the landscape. Development on this site would form a natural extension to that on neighbouring site 151 and would have less landscape impact compared to other sites surrounding Halesworth. Residential development would be located close to services, facilities and employment opportunities. This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.
Site 153 - Town Farm 3, off Harrisons Lane, Halesworth

Suggested Use: Housing
Site Area: 2.92

This is a large site located to the east of the existing sports ground. This site is in a prominent location and slopes down towards Holton to the east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency identifies this site as being located in source protection zone 2.

Historic England cautioned that development on this site would impact upon the setting of Town Farmhouse, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact. Full details can be found on the Council’s website.
Halesworth Town Council believes that sites 151, 152, 153 and 161 should be used for new sports facilities.

Halesworth and Blyth Valley Partnership believed that sites 153 and 155 could both be linked to developments on site 161.

An owner of part of this site expressed concern that the road network could not support further development. This site is currently only accessible via the neighbouring chicken farm and the nearest roads serving the area are quite narrow. Development on this site would be quite prominent and would harm the appearance of the town. The sloping countryside is an important part of the approach to the town and the site is part of an area of fields and ancient hedgerows which are an important part of the landscape character. Development would impact upon the setting of a listed building. This site is productive agricultural land which is not suitable for development.

Members of the public supported the redevelopment of these sites with new health facilities. However there was concern that development on this site would lead to erosion of the strategic gap. There was a feeling that not enough had been done to inform local residents about the consultation and that this should invalidate any land use allocations on the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access can be provided through nearby sites. This site can be made attractive to the market if road access is installed.

The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for accommodating new development. Site 153 is a sloping site which would be visible from the surrounding area and also borders a sensitive urban fringe to the south and is a remnant of ancient field patterns. However the site is less prominent than neighbouring sites to the north and south and so makes a smaller contribution to the surrounding landscape. Development would be in a prominent location and careful design would be needed to mitigate landscape impact.

There is a hedgerow along the boundary together with mature trees.

The surrounding road network is quite narrow and the junction between Fair View Road and Norwich Road may require improvement.

This is a large site in a prominent location with potential for archaeological remains. Development proposals should be accompanied by a programme of archaeological investigation. This should identify remains and the impact of development. It should also suggest a programme for managing that impact, including preservation in situ.
This site could accommodate 88 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

There draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development on this site could impact on the landscape in terms of views between Halesworth and Holton. Another negative effects was that development would result in a loss of agricultural land.

Minor positive effects are that development would be located close to services and facilities and would encourage sustainable transport methods. Development would help meet local housing needs.

Retention of existing trees and hedges will mitigate landscape impact. Consideration should also be given to design and landscaping in order to mitigate landscape impact.

**Conclusion**

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.
Site 154 - Town Farm 4, off Harrisons Lane, Halesworth

Suggested Use: Housing
Site Area: 0.69

This site is a small flat field located to the east of Town Farm. The site is isolated from the road and surrounded by tall trees and hedges. The site is in a prominent location with good views to the south and east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of grade II listed buildings: Town Farmhouse to the west and Hill Farmhouse to the south.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.
Halesworth Town Council stated that this is an isolated site but could be considered for development as part of proposed sports facilities on a neighbouring site.

Halesworth and Blyth Valley Partnership states that site 154 will suffer from access problems unless part of site 65 is developed as well.

No comments were submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would lead to the creation of urban sprawl between Halesworth and Holton. This site is part of a network of fields and hedges that forms an important part of the local landscape. A nearby 'loke', or green lane, is also an important landscape feature which must be preserved. This site also suffers from inadequate drainage and is prone to surface water flooding. The site is poorly linked to the existing road network and is distant from the town centre, which will increase car use and cause congestion. Sites to the north and west of the town were identified as preferable locations for development. Development of this site will result in the loss of productive agricultural land.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment has not identified any constraints that cannot be mitigated. Access to this site can be achieved through neighbouring site 152, which is in the same ownership.

Electricity lines cross the site from north to south. The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located in an area of high landscape sensitivity, moderate landscape value and with moderate capacity for new development. The surrounding landscape is an ancient remnant of earlier farming patterns. Although located in a prominent location the site is bordered by tall trees and thick hedgerows which obscure it from the surrounding area.

The trees and hedges surrounding the site make a positive contribution to the landscape and biodiversity and should be retained.

The site is visible from the south and east.

Location of this site means that there is potential for archaeological remains. There is no objection in principle to development on this site but proposals should be accompanied by a programme of archaeological investigation.

Town Farm to the west could create issues with noise and odour.
The assessment has identified this site as having potential capacity for 14 dwellings at a density of 20 dwellings per hectare. This is in accordance with the density on site 152 and would mitigate landscape impact.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Loss of agricultural land would have minor negative effects on the site. Development would have a minor negative effect on the landscape and on biodiversity.

A minor positive effect is that the site located close to services and employment and could encourage sustainable movement patterns. Development would help to meet local housing needs.

Development should retain trees and hedges surrounding the site to mitigate landscape impact. Consideration should also be made in regards to design and landscaping.

**Conclusion**

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.
Site 155 - Town Farm 5, off Harrisons Lane, Halesworth, Suffolk

Suggested Use: Housing
Site Area: 0.53

This is a small site located between the cemetery to the south and Town Farm to the north. The site slopes gently towards the south but is fairly flat and is surrounded by mature trees and hedges.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of grade II listed buildings: Town Farmhouse to the north and Hill Farmhouse to the south.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.
No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley partnership states that development on this site could be linked to development on site 161.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would erode the strategic gap and lead to coalescence between Halesworth and Holton. This site is a rare example of an enclosed paddock and so is considerable landscape value. The site is part of the peaceful setting of Halesworth cemetery. It should also be conserved because of its wildlife value. Access to the site would be via Loam Pit Lane which is narrow and already experiences congestion. Sites to the north and west of the town were identified as being preferable for development. Not enough was done to inform members of the public about the consultation and this should invalidate any allocation on the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access to this site is via a narrow track which is too narrow to support development and improvement is not possible.

The foul sewer network will require improvement prior to development.

The Settlement Fringe Landscape Sensitivity Assessment identifies this site as being located in an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The site is set in an ancient remnant landscape and is surrounded by tall trees. The site is small and sandwiched between the cemetery and farm buildings.

Trees surrounding the site make a positive contribution to the landscape and biodiversity although the site itself is not visible from a distance.

New housing on the site would be visible from the south but landscape impact could be mitigated with low rise, careful design.

Development could impact upon the setting of the cemetery and farmhouse to the north-west. Road access would require significant improvement and there is the risk of congestion along Loam Pit Lane.

Location of this site means that there is potential for archaeological remains. There is no objection in principle to development on this site but proposals should be accompanied by a programme of archaeological investigation.

There is the risk of noise and odour caused by Town Farm to the north.

This site could accommodate 10 new dwellings at 20 dwellings per hectare.
Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects include the loss of agricultural land and a negative impact on the landscape. Development would also have a minor negative effect upon Halesworth Cemetery and local biodiversity.

Minor positive effects are that development would be located close to services and employment and could help promote sustainable transport. Development would help to meet local housing needs.

Development should retain trees and hedges surrounding the site to mitigate landscape impact.

Conclusion

This site has been allocated within the First Draft Local Plan (Policy WLP4.1) together with surrounding sites to help deliver housing and support the delivery of new sports and health facilities on the Halesworth Campus and Dairy Hill Playing fields.
Site 159 - West of A144 opposite Triple Plea, Halesworth / Spexhall

Suggested Use: Not specified
Site Area: 0.99

This is a flat site surrounded by mature hedgerows and trees. The A144 bounds the site to the west and a narrow lane to the east with the Triple Plea pub facing the southern corner of the site. The surrounding landscape is flat and made up of arable fields. Farm buildings bound the site to the east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Halesworth Town Council stated that this is a very small site on the boundary with Spexhall. Halesworth Town Council and Spexhall Parish Council therefore need to look at development on this site together.
Halesworth and Blyth Valley Partnership stated that this site could be allocated for a small housing development, possibly in conjunction with any industrial development to the north of Halesworth.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. Both the water recycling centre and foul sewer network will require improvement prior to development.

There is a minor risk of surface water flooding in the north east corner.

Development on this site would be located in a landscape comprising of flat farmland and would be poorly connected to the existing settlement.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located in an area of high landscape sensitivity, moderate landscape value and moderate capacity for new development. This site set in an ancient remnant landscape and trees and hedges surrounding this site make a significant contribution to the landscape. Low density development and appropriate landscaping could help to mitigate landscape impact.

Hedges and ditches surround the site on all sides.

The public house and farm buildings to the east of the building are of historic value.

The site is bordered by a narrow lane to the east (which is also a national cycle route) and the A144 to the west. The two meet at a small junction, which is considered too small for the volume of traffic it handles and is probably unsafe for cyclists. The nearby A144 could create issues with noise for residential development because part of the road bordering the site has a speed limit of 60 miles per hour.

A Roman road runs along the western side of the site. Development proposals should be accompanied by a programme of archaeological investigation.

This site is no longer available for development.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that development would lead to the loss of agricultural land and a negative impact on biodiversity.
Minor positive effects are that development would be located close to services and facilities within Halesworth. Proposed development would help to meet local housing need and encourage sustainable patterns of movement.

The landscape impact was uncertain although the flat nature of the surrounding area and visibility of the site may mean that development would have a minor negative effect.

Development should be low rise and retain trees and hedges to mitigate landscape impact.

*Conclusion*

At present there is no evidence that this site is available for development. Furthermore, the site is poorly connected to the existing settlement and would be highly visible from the surrounding area. Development would also threaten existing trees and hedgerows, which are an important part of the local landscape. As such the site is not considered suitable for allocation in this Local Plan.
Site 160 - Basley Ground, Bramfield Road, Halesworth

Suggested Use: Not specified
Site Area: 0.87

This site is a playing field with a children’s play area and exercise equipment for adults in its north-west and north east corner. The site is surrounded by hedgerows and slopes gently down towards the south east. There is a copse of trees next to the south eastern edge of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and an ‘Amber’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a medium encroachment risk to a water recycling centre and a sewer pipe runs across the site.

Historic England cautioned that development on this site could impact of the setting of grade II listed South Lodge.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.
No comments submitted by town or parish councils in response to this site.

Halesworth and Blyth Valley Partnership drew attention to successful recent development on a neighbouring site. Limited development on site 160 might be possible, which would provide funding for new sports facilities on the site of the former middle school.

Suffolk wildlife Trust noted that there is the potential for species and habitats of conservation value. No development should be permitted unless it can be proven that these species and habitats will not be harmed.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this site would result in the loss of a sports field, children’s play area and sports equipment and it is not clear where a replacement could be located. The site is also poorly related to the existing development and is in a prominent location in an area of open countryside and as such landscape impact would be considerable and could not be mitigated. There is a medium encroachment risk to a water recycling centre and a sewer pipe traverses the site.

The foul sewer network would require improvement prior to development.

Much of the site is located within the flood risk zone and is also at a high risk from surface water flooding.

Mature trees and hedges surround the site and there is a patch of trees to the south of the site.

There is high potential for organic environmental and structural remains on this site and possibly remains on a bridge. Development proposals should be accompanied by a programme of archaeological investigation to identify remains and the impacts of development, as well as to suggest a programme of impact management. This should include preservation in situ where appropriate.

This site is no longer available for development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal has identified a significant negative effect on the landscape. Minor negative effects are that development would result in the loss of agricultural land.

Minor positive effects include development being close to services and employment and would help promote sustainable movement patterns. Development would help to meet local housing needs.
Uncertainty surrounds the impact upon the historic environment.

Development should retain trees and hedges to mitigate landscape impact and flood protection measures to mitigate flood risk.

**Conclusion**

This site is not suitable for allocation in the Local Plan because it would also lead to the loss of a playing field and it is not clear if this would be replaced. Development is also located within the flood zone and there are sequentially more preferable sites in terms of flood risk available for development within Halesworth. As such the site is not considered suitable for allocation in this Local Plan.
Site 161 - Dairy Hill, Halesworth

Suggested Use: Housing
Site Area: 3.12

This site is the existing playing field for Halesworth and the surrounding area. To the south there is a marshal arts school, tennis courts, a bowling green and children’s play area. The hospital borders the site to the east, the former middle school is located to the north and there are open fields to the east. Residential areas border the site to the south.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency has identified this site as being located in source protection zone 2.

Historic England cautioned that development on this site could impact upon the setting of grade II listed Town Farm House to the east.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Halesworth Town Council strongly supported development of this site and the neighbouring site for sport and health facilities. New sports facilities are greatly needed by Halesworth and surrounding parishes, particularly those to the south of the town.

Halesworth and Blyth Valley Partnership strongly supported the allocation of this site for health, welfare and independent living.

No comments submitted by developers or landowners in response to this site.

Members of the public were supportive of development of a health centre to replace the existing facilities at Patrick Stead.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The assessment did not identify any constraints that could not be mitigated. Access to the site is via narrow residential roads on steep slopes, including a small roundabout. Work would be needed to ensure that the road network could cope with increased traffic.

The foul sewer network will require improvement prior to development.

There is a small risk of surface water flooding on the site.

The site is in a prominent location and careful design is needed to mitigate landscape impact.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The eastern and southern boundaries of this site are set against a sensitive urban boundary and the land itself is part of an ancient remnant landscape. The prominent location of this site overlooking both the town and the countryside means that it makes an important contribution to the surrounding landscape.

The site is bordered by bushes and trees, which are of some landscape value.

Development on this site will result in the loss of playing fields but this will be compensated for by the provision of new facilities at the former middle school site.

The size of this site means that development should be accompanied by a programme of archaeological investigation.

This site is no longer available for development.
Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identified a significant negative landscape effect because of the site’s prominent location. A minor negative effect was the impact on natural resources.

Minor positive effects include that development would be located close to services and employment and may encourage sustainable movements patterns.

The impact on the effect on housing need is unknown.

Development should be carefully designed and retain vegetation on the site to mitigate landscape impact.

Conclusion
The site is no longer available for redevelopment. Therefore it should not be allocated for residential development as part of this Local Plan. Instead the site has been allocated within the First Draft Local Plan (Policy WLP4.1) as part of wider proposals for housing development and improvement to sports facilities. The indicative masterplan indicates that this site is to continue to be used for sports.
Site 162 - South of Wissett Road, Halesworth

Suggested Use: Not specified
Site Area: 0.20

This is a small overgrown site in a residential area. The site contains the remains of the former guide hut and there is residential development on all sides. Historic buildings and the conservation area border the site to the south.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of numbers 15, 16, 17 and 18 Rectory Street, all of which are grade II listed.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.

Halesworth Town Council stated that development on this site would provide a few extra houses and
improve the area with minimal impact upon Wissett Road.

Halesworth and Blyth Valley Partnership stated that development would tidy up this site with minimal impact upon the surrounding area.

No comments submitted by developers or landowners in response to this site.

No comments submitted by members of the public in response to this site.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The assessment did not identify any constraints that cannot be mitigated. The site could be accessed from Wissett Road to the north. Access is currently blocked via a locked gate and would require improvement for development to take place. Wissett Road to the north is narrow and undulating, although it is paved along each side.

There is surface water flood risk in the middle and west of the site.

The site is fairly flat but is located in an area of rolling countryside to the north west of the town centre.

The site is overgrown and so could be of biodiversity value.

There are some older residential buildings to the south and east of the site.

This site has high potential for archaeological remains because of its location on spur of land overlooking the river Blyth. The site is located on the edge of Anglo Saxon and medieval Halesworth. There is no objection to development on this site but proposals should be accompanied by a programme of archaeological investigation.

Landownership is uncertain and so the site cannot be considered available for development.

*Summary of Draft Sustainability Appraisal*

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on natural resources, biodiversity and the historic environment.

Minor positive effects are that development would be located close to services and employment and could encourage sustainable movement patterns. Development would help to meet local housing needs.

Careful attention to design will be needed to minimise impact on the nearby conservation area. Retention of trees and hedges on the site will help to mitigate townscape impact.
Conclusion
There is no evidence that this site is available for development. As such the site is not considered suitable for allocation in this Local Plan.
Site 163 - West of Roman Way, Halesworth

Suggested Use: Not specified
Site Area: 1.91

This site is the eastern edge of a much larger field that extends westwards along Chediston Street. Halesworth borders the site to the south and east and open countryside to the north and west. The site slopes downwards into a river valley with a line of trees to the north of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.
Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Red’ impact. There is a possible Roman structure that may require preservation in situ.

Halesworth Town Council stated that development on this site would have good access to the major road network and the town centre and would enhance the area as it is not too big.
Halesworth and Blyth Valley Partnership stated that development on this site has access to good infrastructure along Roman Way and would form a natural extension to the well planned development to the east of the town.

No comments submitted by developers or landowners in response to this site.

One member of the public commented on this site, drawing attention to a large piece of land directly to the west and arguing that it would be a good location for future housing development. This is because it would be inconspicuous in the landscape and would enjoy good access to the town centre and Market Place via Chediston Street.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment has not identified any constraints that cannot be mitigated. Access is currently via a track onto Roman Way.

A sewer pipe traverses this site. The foul sewer network will require improvement prior to development.

The site is adjacent to the flood risk zone and the southern and western parts of the site are at risk from surface water flooding.

The Settlement Fringe Landscape Sensitivity Study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The southern edge of this site is also bordered by a sensitive urban fringe. This is a very open landscape with long sight lines, which contributes to its sensitivity. Site 163 is small and makes only a limited contribution to the landscape but would be visible from a significant distance to the east.

This site is located on the edge of a sensitive area of countryside. Small scale development of an appropriate design may be acceptable.

Development may impact upon the road network. A national cycle route runs along the northern edge of this site.

Roman remains on the site indicate the presence of a significant structure. Pre-historic, Roman and Anglo Saxon remains discovered to the west of the site. Development proposals on this site should be accompanied by a programme of investigation which identifies archaeological remains, the impacts of development and possible mitigation measures.

This site is not available for development in isolation.
Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified a significant negative effect on natural resources because it would result in the loss of grade 2 agricultural land. Minor negative effects include the impact on the landscape and biodiversity. There is also potential for archaeological remains on this site.

Minor positive effects are that development would be located close to services and employment and would support sustainable patterns of movement. Development on this site would help to meet local housing needs and would support the local town centre.

Proposed development would form a visible incursion into the countryside but sensitive design and landscaping could mitigate impact.

Conclusion

The wider field in which this site sits has been separately submitted for consideration. This small part of the field is not considered available in absence of the larger site. The conclusions for the larger site are found under Site 203 which is allocated as WLP4.2
Site 177 - Southwold Road / Blyford (B1123), Holton

Suggested Use: Housing
Site Area: 1.56

This is a small site to the east of Holton bordering the B1123 to the north. The site slopes away to the picturesque Blyth valley to the south. The site is overgrown and is surrounded by tall trees and mature hedgerows on all sides.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
This site did not form part of the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraint that could not be mitigated. Electricity lines run along the northern edge of the site.

Flood zone 2 borders the site to the south and parts of the site are at high and low risk of surface water flooding.

The Settlement Fringe Landscape Sensitivity Assessment identifies this site as part of an area with moderate landscape sensitivity, value and capacity for new development. This site is part of an ancient...
remnant landscape, although one which has seen some more recent changes. The value of this site to the landscape is in the tall trees and hedges that surround it and which must be protected in the event of development. This site is not connected to any existing settlement and would encroach into an area of attractive countryside, particularly to the south and landscape impact could not easily be mitigated.

Access is via a gate onto the B1123 which is a fast road with a pavement but no cycle lanes.

The site is overgrown and surrounded by tall hedges and trees.

There is capacity for 23 dwellings on this site at a density of 15 dwellings per hectare to minimise landscape impact in a remote rural location.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in terms of access to services, the impact on the landscape, the loss of agricultural land and the potential impact on biodiversity.

Minor positive effects are that development would be located close to employment and could encourage sustainable patterns of movement. It would also deliver new housing for the local area.

Mitigation measures could include the retention of trees and hedges to mitigate the effect on biodiversity.

**Conclusion**

This site is not considered suitable for allocation in this Local Plan. Development on this site would be isolated from existing settlements with poor access to services and facilities compared to other sites in Halesworth and Holton.
Site 203 - Land adjacent to Chediston Street, Halesworth

Suggested Use: Housing
Site Area: 9.17

This site is a large field that extends along the southern edge of Chediston Street. It is bordered by site 163 to the east. The site slopes downwards towards a river valley with a line of trees running parallel to the north of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
This site did not form part of the consultation although comments have been received on site 163, which forms part of this site.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that cannot be mitigated. Access is via a track that leads through neighbouring site 163 onto Roman Way.

There are areas of low and medium surface water flood risk on this site.

The Settlement Fringe Landscape Sensitivity study identifies this site as being located within an area with high landscape sensitivity, a moderate landscape value and a moderate capacity for new development. The
southern edge of this site is also bordered by a sensitive urban fringe. This 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. However sensitive development that provided a high quality urban edge would be acceptable. Although development would be prominent in the landscape this could be mitigated through landscaping and sensitive design.

There is a hedge along the western edge of this site. The northern edge is overgrown and may be of biodiversity value.

Chediston Street is a fast, busy road. It is part of a national cycle route but there is no dedicated cycle lane.

Archaeological potential on site 163 could also apply to site 203 as well.

The assessment identifies this site as having capacity for 200 dwellings at a density of 25 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified a significant negative effect upon natural resources because development would result in the loss of grade 2 agricultural land. Development would have a minor negative effect on the landscape and biodiversity.

Minor positive effects are that development would be located close to services and employment and could support sustainable patterns of movement. Development would help to meet local housing need.

Archaeological effects are not known but Roman artefacts have been found on the site and there is potential for further archaeological content to be found.

Proposed development would form a visible incursion into the countryside but sensitive design and landscaping could mitigate impact.

**Conclusion**

The site is one of closet sites to Halesworth Town Centre and therefore has good access to services and facilities. It is adjacent to development on two sides and any impact on the landscape could be effectively mitigated. As such the site has been allocated in First Draft Local Plan for 200 dwellings.
Southwold and Reydon Area

Site 5 - Brambles Drift, Green Lane, Reydon, Southwold

Suggested Use: Housing
Site Area: 2.53

This is a large flat site used for arable farming that sits on the north-west corner of Reydon, on the corner between the B1126 Wangford Road and Green Lane.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

The Environment Agency identified this site as being located in source protection zone 3.

Historic England cautioned that development on this site would potentially impact upon the setting of the Church of St. Margaret, which is a grade II* listed building.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Reydon Parish Council stated that this site is not needed and should not be included in the Local Plan. Residents opposed the expansion of the village envelope in responses to the Village Plan consultation (2014) and the planning application at St. Felix School. There is no need for a major housing or business allocation given the housing needs analysis provided or the availability of space at Reydon Business Park.

Southwold and Reydon Society stated that this site is unsuitable for development. It is located outside of Reydon in the open countryside and in the Area of Outstanding Natural Beauty. This site is not needed if growth is concentrated in Lowestoft. Local infrastructure, particularly the sewerage network, will not be able to cope with this scale of development.

Suffolk Wildlife Trust stated that this site is located in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated unless it can be demonstrated that it will not impact upon either the Special Protection Area or the Site of Special Scientific Interest.

Members of the public were concerned about landscape impact and felt that development should be directed to sites outside areas of high landscape value. Residents feared the loss of the rural character of Reydon, which had first attracted them to the area. There was a fear that any houses would be used as second homes. The sewage network and road network were considered inadequate to support new development. It was feared that new development would place too much strain on healthcare, shops and educational services. The road network is inadequate for supporting further development. In particular the site is close to the junction between Wangford Road and Green Lane, which is dangerous because traffic cannot see round the tight corners. Adding 75 houses would only exacerbate this problem. It was felt that development should be located outside of this area with its high landscape value. A new settlement was suggested in an area outside of the Area of Outstanding Natural Beauty.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that cannot be mitigated. The main issue confronting development on this site would be to ensure that it does not have an impact upon the surrounding landscape. This has been identified by the Settlement Fringe Landscape Sensitivity Study as an area with low capacity for development because of its low landscape sensitivity and very high value, with a sensitive urban edge to the south. This site makes an important contribution to this landscape area because it is visible in an area of flat open landscape and next to the settlement fringe. Development would form an encroachment into the AONB and would be highly visible from the surrounding countryside.

Other issues to resolve are the possible improvements needed to the road network, particularly to Green Lane, which is narrow and may require widening to serve additional housing. In addition there is a sewer pipe crossing the site. This infrastructure will need to be redirected or development will need to be designed and built to take account of it. Foul sewerage network improvements would be needed to accommodate development.
The site has a high archaeological potential.

The assessment has identified that this site has capacity for 75 dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was identified in the appraisal relating to the impact on the landscape. There is concern that the proposal would significantly encroach upon into the AONB as outlined above. Other negative effects included the loss of undeveloped land.

Minor positive effects included that the development would be located close to health facilities, open space, shops and employment opportunities. It would also help to meet the housing needs of the whole community and could encourage sustainable movement patterns.

In terms of mitigation proposed development should retain existing hedgerows and use low rise, high quality design in order to reduce landscape impact. Development could be used to protect and enhance hedgerows on the edge of the site and to enhance the urban edge to the north of Reydon.

**Conclusion**

Development on this site is considered to have a greater material impact on the Area of Outstanding Natural Beauty than the preferred site allocated to the west of Copperwheat Avenue in the First Draft Local Plan (Policy WLP6.1). It also has poorer access to services and facilities in Reydon and Southwold. The preferred site can deliver sufficient housing for the Southwold and Reydon area under the strategy outlined under Policy WLP1.1. As such this site is not considered suitable for allocation in this Local Plan.
Site 6 - Broadside Park Farm, Reydon, Southwold

Suggested Use: Housing
Site Area: 2.95

This site is a rectangular strip of land that runs in parallel to the coast. It is located to the west of Broadside Park Farm and overlooks Buss Creek to the south. Scattered dwellings border the site to the east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Reydon Parish Council stated that development on this site is not necessary and should not be included in the Local Plan. Residents oppose the expansion of the village envelope as evidenced in responses to the Village Plan consultation (2014) and the planning application at St. Felix School. There is no need for major...
housing or business allocations given the housing need assessment provided and the availability of unused employment land at Reydon Business Park.

Southwold Town Council stated that this site is not suitable for development because it lacks infrastructure, is in a prominent location in the Area of Outstanding Natural Beauty and Suffolk Heritage Coast, and is at risk from coastal erosion. Coastal erosion is progressing more quickly than expected and new surveys should be undertaken to revise estimates of the rate of erosion for Easton Bavents.

Southwold and Reydon Society stated that this site is wholly unsuitable for development because it is remote from the existing settlement and is located in the open countryside within the Area of Outstanding Natural Beauty and close to a site of reed beds which are of national significance. Access of traffic from this site onto Lowestoft Road would be dangerous. If this site was allocated for development then traffic would increase still further. The society believes that Lowestoft is the best location for development and that means that development on this site would be unnecessary.

Suffolk Wildlife Trust stated that this site partly includes the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated for development unless it can be demonstrated that it will not harm the site of special scientific interest.

No comments submitted by developers or landowners in response to this site.

Members of the public were mostly opposed to development on this site because of its location in an area of high landscape value, which is also vulnerable to coastal erosion. Development of this land as a traveller or holiday site would harm the appearance of the landscape and would create issues with noise. The site is remote from Reydon, the road network only has limited capacity to support future development and access onto Lowestoft Road would be dangerous. The sewage network only has limited capacity to support future development.

However there was some support for development on the site. Some Members of the public thought that a temporary use might be appropriate and the site could also be developed for a nursing home or holiday homes.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this location would have a significant adverse impact on the landscape and this could not be mitigated. This site is situated in a highly prominent location with views towards Southwold to the south. The Settlement Fringe Landscape Sensitivity Study identifies this as an area with low capacity for future development because of its low sensitivity and very high landscape value. This site is an important part of the landscape because of its prominent and exposed location. There are also views from Southwold facing northwards towards the site.

There is also no suitable road access to this site. The closest public access is an unmade track leading to Euston Lane, which would require significant improvements.
Part of this site is located within 30 metres of a coastal change management area and a coastal erosion vulnerability assessment will be required.

The foul sewer network would require improvement. Electricity lines run across the site from north east to south west. Phone lines cross on the northern and eastern boundaries.

Hedgerows surrounding the site could be supporting biodiversity as could the heathland to the east. This could be lost or significantly harmed if development did occur.

There is archaeological content on this site, which was part of a World War 2 military strong point, with a pill box, trenches and gun emplacement. Proposals on this site should be accompanied by a programme of investigation, including an assessment of the impact caused by development and mitigation measures, including for preservation in situ where appropriate.

There is also potential risk of smells and noise coming from the nearby pig farm.

There is no capacity for development on this site.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identified a significant negative effect upon the landscape. Development would be situated in an exposed and prominent position in the landscape with views towards Southwold. Impact of development on this site could not be mitigated. Minor negative effects were that development would be poorly connected to services and shops, there would be a loss of natural resources and a loss of biodiversity.

A minor positive effect was that housing development would help to meet the housing needs of the local community.

A potential significant negative effect is that some properties would become vulnerable to coastal erosion in the future.

Mitigation measures for landscape impact are not considered possible.

Conclusion
This site is not suitable for development because of its significant negative effect upon the Area of Outstanding Natural Beauty and Heritage Coast, which could not be mitigated. In addition providing road access would not be viably possible and the site is potentially at risk from coastal erosion.
Site 26 - Jubilee, Green Lane, Reydon

Suggested Use: Housing
Site Area: 1.22

This is a small site to the north of Green Lane, opposite the recreation ground. The site is surrounded by mature trees and is used as a caravan park.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England cautioned that development on this site has limited potential for impact upon the Church of St. Margaret to the west, which is a grade II* listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber/Green’ impact.
Reydon Parish Council believes this site is suitable for a mixed development of affordable and low cost housing.

Southwold and Reydon Society notes that this site is located next to the existing settlement and adjacent to the site agreed for housing under the exceptions policy in DM22. There are also three houses on the corner of Green Lane / Rissemere Lane, which this site surrounds. The site is in the countryside and the Area of Outstanding Natural Beauty. Despite this there is the possibility that the site could accommodate small scale development of affordable housing or small low cost commercial development. If growth is concentrated in Lowestoft then small scale developments such as on this site will be adequate to meet housing targets in Southwold and Reydon. Development here must be carefully planned to minimise landscape impact on visual amenity and the environment of the Area of Outstanding Natural Beauty. Infrastructure will need to be improved, in particularly the sewerage network, which is already operating at or above capacity. A footpath will need to be provided along the part of Rissemere Lane which will be developed under this proposal.

Suffolk Wildlife Trust notes that this site is situated in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should therefore not be allocated for development unless it can be demonstrated that it will not harm the Special Protection Area of the Site of Special Scientific Interest.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that development on this site would form a prominent incursion into countryside to the north of Reydon. It could set a precedent for further development elsewhere. This would also threaten local areas of conservation value and would change the character of the village. Residents feared that the character of Reydon would change and become more urban. There was concern that the road network would not be able to cope with additional housing and that Green Lane and Rissemere Lane East were too narrow. In addition the sewerage network would struggle to cope with additional development. Local services, in particular schools and healthcare, will not have the capacity to cope with new housing and there are not enough jobs for new residents. If new development was allocated on this site then it should be reserved for local people.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment did not identify any constraints that cannot be mitigated. This site is accessed via a narrow track from Rissemere Lane East, which is itself quite narrow. One of the main issues surrounding development would be the need to provide adequate road access.

In addition development on this site would form a small incursion into the open countryside, which is part of the Area of Outstanding Natural Beauty. The Settlement Fringe Landscape Sensitivity Study identifies this site as part of an area of historic farmland, with low landscape sensitivity but very high landscape value and a low capacity for future development. This site is surrounded by trees and hedges which contribute towards the appearance of the landscape but would help to shield future development, provided it is fairly low density and low rise.
The foul sewer network would require improvement.

There is high potential for archaeology on the site.

The assessment identifies this site as having potential capacity for 12 dwellings on this site.

**Summary of Draft Sustainability Appraisal**

A significant impact on the landscape was identified in relation to the impact on the AONB. Minor negative effects include the loss of grade 3 agricultural land and the loss of tourist accommodation.

Minor positive effects are that development would have good access to shops, services and health facilities, meeting the housing needs of the local community and the promotion of sustainable movement patterns.

Mitigation measures include the retention of trees and shrubs on the site and the use of low rise, well designed buildings. Development on this site should include measures to protect trees and hedges on the site and to improve and strengthen the urban frontage along the northern boundary with Reydon.

**Conclusion**

Development of this site would form an unnatural incursion into the Area of Outstanding Natural Beauty. Additionally it would result in a loss of tourist accommodation. As such this site is not considered suitable for allocation in this Local Plan.
**Site 38 - Land at Green Lane, Reydon**

Suggested Use: Mixed use  
Site Area: 6.11

This site is the largest of the sites located to the north of Green Lane. It is a large, flat site that extends to the north of Reydon and is bounded by mature hedgerows on all sides.

*Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation*

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Environment Agency states that this site is located on a former landfill site.

Historic England cautions that development on this site would potentially impact upon the Church of St. Margaret to the west, which is a grade II* listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
Reydon Parish Council believed that this site and the others around Reydon are not needed for development and should not be included in the Local Plan. Local residents were strongly opposed to large scale development, as evidenced in the responses made to the Village Plan Consultation (2014) and the planning application at St. Felix School. Given the analysis of housing market need provided and the vacancies at Reydon Business park there is no justification for further large scale housing or industrial allocations.

The Southwold and Reydon Society stated that this site is not suitable for development. It is situated outside of the development limits in the Area of Outstanding Natural Beauty. The local road network would not be able to cope with additional traffic created by business uses and the sewerage network is already operating at or above capacity. This site is not needed if development is to be focused in Lowestoft, which the society considers to be the preferable option. Other smaller sites could accommodate additional development without impacting upon the countryside or infrastructure. There is unused land at Reydon Business Park which could be used for light industrial development.

Suffolk Wildlife Trust states that this site is in close proximity to the Benacre to Easton Bavents Special Protection Area and the Pakefield to Easton Bavents Site of Special Scientific Interest. This site should not be allocated unless it can be demonstrated that neither the Special Protection Area nor the Site of Special Scientific Interest will be affected.

No comments submitted by developers or landowners in response to this site.

Members of the public were concerned that allocating this site for development would harm valuable protected landscapes and wildlife habitats. Respondents were concerned that the character of Reydon would change. The road network would not be able to cope, in particular because there are a number of junctions nearby which have poor visibility: Green Lane / Wangford Road; Green Lane / Rissemere Lane East / Cox’s Lane / Covert Road. This is a particular problem because Cox’s Lane is used as a rat run during rush hour times. Allocated development on this site would potentially place considerable strain on local healthcare services. The sewage network would also be unable to cope with the proposed allocation. Reydon also does not have adequate schools or shops to support the proposed development allocation. It was also felt that development would be better located Lowestoft or in a purpose built settlement located outside areas of landscape value, which would make allocated sites in Reydon surplus to requirements.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that cannot be mitigated. The main concern about development on this site is providing road access for employment related traffic. Green Lane is narrow and may need to be widened. There is also the risk that employment related uses could cause a nuisance to nearby residential areas.

Development on this site has the potential to form a major incursion into the open countryside, which could harm the appearance of the AONB. The Landscape Sensitivity Study identifies this site as being part of an area of historic farmland. The Settlement Fringe Landscape Sensitivity Study identifies this area as
having a low sensitivity to new development and a very high value. Capacity to accommodate new
development is therefore low. The northern edge of Reydon is a sensitive urban fringe in a landscape area
that is considered to have a low capacity for development. This is a large site in an area of fairly flat
farmland and its size means that it forms an important part of the landscape. Development would be quite
visible on this site and the hedgerows also make an important contribution to the landscape. Careful
design and landscaping are therefore needed to mitigate landscape impact. This would probably be best
achieved by developing this site along with others on the northern edge of Reydon. There were no
significant positive effects from development on this site.

The foul sewer network would require improvement.

This site is situated in an area of archaeological importance, recorded in the County Historic Environment
Record. This is a multi era complex with strong potential for archaeological content. Proposals for
development should include a programme of archaeological development that demonstrates the impact
of development and suggest proposals to manage those impacts.

The Environment Agency has also identified this as a former landfill site, which may require mitigation
work.

The assessment has identified this site as having potential capacity for 100 dwellings.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified that development on this site would have a significant negative
effect upon the landscape. Development would form a major incursion into the open countryside and
would be highly visible form the surrounding area. Minor negative effects included the loss of grade 3
agricultural land and the impact on biodiversity.

Minor positive effects included providing housing in an area with accessible services and facilities.
Proposed employment development would also help to reduce levels of deprivation and support the
economy. This site could also encourage sustainable movement patterns.

Mitigation measures include the use of low rise, high quality designs and the retention of existing
hedgerows on the site to reduce landscape impact. Development should preserve and enhance the
network of hedgerows which surrounds and bisects this site. It should also improve the urban fringe along
the northern edge of Reydon. Residential development of Reydon should include adequate provision of
play space and should help to ensure that residents have access to surrounding footpaths and countryside.

**Conclusion**

Development on this site is considered to have a greater material impact on the Area of Outstanding
Natural Beauty than the preferred site allocated to the west of Copperwheat Avenue in the First Draft
Local Plan (Policy WLP6.1). It also has poorer access to services and facilities in Reydon and Southwold. The
preferred site can deliver sufficient housing for the Southwold and Reydon area under the strategy outlined under Policy WLP1.1. As such this site is not considered suitable for allocation in this Local Plan.
Site 117 - Land to the west of Laurel Farm Reydon, Reydon

Suggested Use: Housing
Site Area: 19.80

This is a large site flanking Reydon to the west. The site is flat and is bounded by mature hedgerows on all sides. There is a small depression in the southeast corner of the site which gives the southern portion of the site an undulating appearance.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

The Environment Agency has identified this site as being located in source protection zone 1. Historic England cautioned that development on this site will impact upon Gorse Lodge Farmhouse, which is a grade II listed building.

Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.
Reydon Parish Council stated that none of the sites proposed in the village will be needed and so should not be designated in the local plan. Public responses to the Village Plan consultation in 2014 and to the planning application at St. Felix School indicated strong opposition to expansion of the village envelope. There is no case for major housing or industrial allocations in Reydon given the spare capacity at Reydon Business Park and analysis of housing needs.

Southwold and Reydon Society stated that this site is remote from the settlement and forms an incursion into the Area of Outstanding Natural Beauty. Development would only make sense if the neighbouring site to the east was also developed. This would create a development of 700 houses which is extremely large for a settlement of this size. Road and sewerage infrastructure are inadequate to support development on this scale. There is no need for development on anything like this scale if most development is to be focused in Lowestoft. The needs for housing can be met by small scale development within the settlement boundaries or along the edge of the settlement in line with the exceptions policy detailed in DM22.

The landowner (AR Hall) noted that the same sustainability appraisal issues have been identified for this site as the neighbouring site 118. Site 117 is 19.80 hectares in size and could accommodate 600 houses at a density of 30 dwellings per hectare. The landowner accepts that it would not be appropriate to develop a site of this size in its entirety. However the availability of this site is important in facilitating future development to the north of the Halesworth Road. The site is in the landowner’s sole ownership and is considered available, suitable and deliverable in the next five years.

Members of the public were opposed to development on this site for the following reasons:

- development of the whole site would form a major incursion into the open countryside;
- scale of development is inappropriate for a village of this size and would make it feel like a town;
- there is a range of wildlife in the area which would be threatened by development;
- impact upon local infrastructure and services;
- the sewerage system is already at capacity and frequently backs up, which causes flooding;
- drains will also not be able to cope;
- the junction between Keen’s Lane and Halesworth Road is dangerous, being close to a blind bend and a dip in the road. This is a safety issue that would be exacerbated by further development;
- health services and schools would not be able to cope with the extra demands placed on them;
- new houses would be used be second homeowners or rented out to tourists, rather than providing accommodation to local people;
- Southwold already accommodates a lot of tourists, particularly during the summer months, which leads to congestion and parking problems.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The impact of development on the landscape is considered to be a significant constraint. Development of the entire site would have a major impact upon the Area of Outstanding Natural Beauty and the urban fringe of Reydon, which is considered to be sensitive. The Settlement Fringe Landscape Sensitivity Study identifies this as an area of historic farmland with a low sensitivity and a very high landscape value,
meaning that there is low capacity for development on this site. This site makes an important contribution to the landscape partly because of its size, but also because of the open and slightly undulating character of the landscape. It is also close to the edge of Reydon, which the study identifies as a sensitive urban edge. It is consider that the significant impacts would be difficult to adequately mitigate.

The foul sewer network would require improvement prior to development on this site.

The site has high archaeological potential.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal identified that development would have a significant negative effect upon the landscape. Development on this site would form a major incursion into the open countryside of the Area of Outstanding Natural Beauty. Minor negative effects are that it would lead to the loss of an area of grade 3 agricultural land.

Minor positive effects are that development would be well located for health services, shops, employment opportunities and open space. Development would also encourage sustainable movement patterns and help to meet the housing needs of the local community.

It is important that development conserves the trees and hedgerows surrounding this site and that it improves the urban fringe along the western edge of Reydon. Development should also include adequate provision of play space and improve access to local footpaths and countryside.

**Conclusion**

This site is not considered suitable for development because it of its significant impact on the Area of Outstanding Natural Beauty which would be difficult to adequately mitigate.
Site 118 - Land to the west of Laurel Farm, Reydon (primary area)

Suggested Use: Housing
Site Area: 2.95

This is a small site sandwiched between the much larger site 117 and Keen’s Lane. St. George’s Square and Halesworth Road flank the site to the south and residential development to the east. The historic Gorse Lodge is located to the north and the site is surrounded by open agricultural land to the west. Trees and hedges border the site on all sides. A small depression in the southwest corner lends the landscaping an undulating character.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.

Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England cautioned that development on this site could impact upon the setting of Gorse Lodge Farmhouse, which is a grade II listed building.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ impact.

Reydon Parish Council believed that none of the sites submitted for Reydon are necessary and should not be included in the local plan. Responses to the 2014 Village Plan consultation and the planning application at St. Felix School indicated strong opposition to expansion of the village envelope. There is no case for housing or business development given the existing capacity at Reydon Business Park and the housing needs analysis.

Southwold and Reydon Society noted that this site is located on one side of an unmade road which forms part of the Area of Outstanding Natural Beauty. For this reason, together with safety concerns about traffic access, this site is not suitable for development. It is also noted that the sewerage capacity is already operating at or above capacity. Moreover no development on this scale is needed if the option of concentrating most growth in Lowestoft is pursued, which the Southwold and Reydon Society considers the most suitable option.

The Landowner (AR Hall) discussed the sustainability appraisal for site, noting that the only negative points related to:

A) “conserving and enhancing the distinctiveness and quality of landscapes and townscapes”;
B) “reducing contributions to climate change and mitigating effects”;
C) “conserving natural resources”.

It was thought that A) could be overcome through landscaping and the provision of open space; development could also be designed so as to overcome the negative points in B) and C). This site could deliver up to 90 dwellings and is available and deliverable. The site is bordered by development to the east, public highway to the south and would form a natural extension to the existing settlement. Site access and services could be easily provided and the site’s location on the western edge of the village would minimise congestion. In addition the site is close to local employment opportunities, notably at Sizewell.

Members of the public were opposed to development on this site for the following reasons:

- it would form a significant incursion into the countryside and would harm the appearance of the local landscape;
- development of sites 117 and 118 would be out of proportion with the scale of Reydon and would change the character of the village;
- the water supply and sewerage networks are already overstretched;
- the junction between Keen’s Lane and Halesworth Road is close to a blind bend and a dip in the road;
- congestion is an issue, particularly during the summer months;
- healthcare services and schools would not have the capacity to deal with population growth;
- there is a lack of employment opportunities to support new housing, in particular, there are not enough jobs for young people;
- housing development would be best focused in Lowestoft, which would mean that development on this site is surplus to requirements.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

This site is adjacent to the grade II listed Gorse Lodge. The site is considered to be important to the setting of the building, therefore development would cause substantial harm that would not easily be mitigated.

The site has high archaeological potential.

Development on this site would result in encroachment into the open countryside, which could harm the AONB as well as the urban frontage of Reydon. The Settlement Fringe Landscape Sensitivity Study identifies this site as part of an area of historic farmland. Although this landscape has a low sensitivity to development its very high value means that the landscape has a low capacity for new development. This site contributes to the landscape because of trees and hedges that surround it and its location next to a sensitive stretch of urban fringe of Reydon means that it is in an important location. As a result any future development would have to give careful consideration to design and landscaping.

Improvements to the foul sewer network would be needed prior to development.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified that development would have a significant negative effect upon the historic environment with development taking place within the setting of a grade II listed building. There would also be a significant negative impact on the landscape. Development on this site would encroach into the open countryside and would impact upon the landscape to the west. A minor negative effect is that the northern part of the site is situated within source protection zones 1 and 3.

Minor positive effects are that development is well located for local health services, open space and employment opportunities and that it will help to meet the housing needs of the local population. This site could also encourage sustainable movement patterns.

Mitigation measures include the retention of existing trees and hedges surrounding the site to reduce landscape impact and the use of low rise, high quality design. Development should provide quality play space.

Conclusion

This site is not considered suitable for development as it would likely cause substantial harm to the setting of Gorse Lodge which would be very difficult to adequately mitigate.
Site 138 - Saint Felix School (Land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon

Suggested Use: Housing
Site Area: 3.21

This site is currently in use as playing fields at St. Felix School and forms a large area of open space to the south of Reydon. The site is located within the AONB but is screened by a thick bank of trees to the north and west of the site, as well as hedges and trees to the south. The site is bounded by existing residential development to the east and west.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets.
Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Historic England cautioned that development on this site could impact upon the setting of Gorse Lodge Farm, which is a grade II listed building.
Suffolk County Council Archaeology noted that the development of this site would have an ‘Amber’ /Green’ impact.

Reydon Parish Council stated that members of the public are strongly opposed to large scale development, as evidenced in response to the 2014 Village Plan consultation and the planning application at St. Felix School. There is no need for a major housing or employment allocation given housing needs analysis and the available capacity at Reydon Business Park.

The Southwold and Reydon Society believed that this site is unsuitable for development. The site is a playing field in a prominent location in the Area of Outstanding Natural Beauty. Road access would be problematic, the sewerage network is already operating at or beyond capacity and there is no replacement for the lost sports facilities. No development on this scale is required in Southwold and Reydon if most development is to be located in Lowestoft, which the society regards as the preferable option.

Suffolk Wildlife Trust noted that this site is adjacent to the St. Felix School County Wildlife Site and may also contain species and habitats of conservation value of its own. This site should not be allocated for development unless it can be demonstrated that it will not harm any existing ecological value the site has.

No comments submitted by developers or landowners in response to this site.

Members of the public were opposed to development for the following reasons:
- incursion into the Area of Outstanding Natural Beauty and urban sprawl;
- development would set a precedent enabling the development of other sites in the area;
- potential harm to the appearance of the entrance into Southwold and Reydon, which could impact upon the tourist trade, which is supported by the setting of Southwold;
- there was opposition to the loss of a school sports field;
- there was concern about the threat to local wildlife habitats;
- site is designated as open space and so any development would be inappropriate;
- increased light pollution would also result;
- pressure on sewerage infrastructure, which is already at capacity;
- increased pressure on road infrastructure;
- site entrance is a dangerous junction with the Halesworth Road;
- local schools and healthcare facilities would be unable to cope with the additional demands placed upon them;
- new houses will be used as second homes and it is unclear how many will be starter homes;
- it is not clear where the jobs to support new residents would come from;
- given recent affordable housing developments it is not clear that any more are needed;
- the planning application on this site was made by St. Felix School for financial reasons and the School’s proceeds from the sale will not be spent on this site;
- brownfield alternatives are available in Southwold.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The main issue is that development on this site would result in the loss of playing fields. It is unclear whether these are surplus to requirements and whether any replacement provision has been found.

Development on this site would encroach upon the AONB, however, it is bounded by existing development to the east and west and the site is surrounded to north and south by mature trees and hedges. This means that development would be shielded from the surrounding countryside to a certain extent. Work would be needed to ensure the safe entry and exit to the site from Halesworth Road. The Settlement Fringe Landscape Sensitivity Study identifies this site as having low landscape sensitivity and a very high value, which means that its capacity for new development is low. Existing development borders the site on two sides, which reduces the chances of significant landscape impact but nonetheless there development on the site could still harm the appearance of the landscape.

Bordering trees and hedges have the potential to support biodiversity.

Development on this site would require improvements to the foul sewer network and a sewer pipe crosses the site which would need to be accommodated.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified that development upon this site would have a significant negative effect upon the landscape. Development on the site would form a large incursion into the AONB but the site is shielded by a thick line of trees to the north and mature trees and hedges to the east and south. Minor negative effects include the potential harm to biodiversity in surrounding trees and hedges.

Minor positive effects are that development on the site would be close to services and facilities, employment opportunities, health facilities and open space. It would also help to meet the housing needs of the whole community and could encourage sustainable movement patterns.

Mitigation measures include the retention of trees and hedges and the use of high quality design a landscaping to reduce landscape impact. It will also be necessary to replace the playing fields lost to development in an equally accessible location.

Conclusion

This site is not suitable for development due to the loss of playing field provision.
Site 142 - Southwold Police Station and former Fire Station site, Blyth Road, Southwold

Suggested Use: Housing  
Site Area: 0.29

The northern half of this site used to accommodate the fire station; the southern half accommodates the police station, although this is due to close in the future. The site is an important part of the entry to Southwold and is highly visible from the north and east.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that the development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Green’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a sewer pipe crossing the site.

Historic England cautioned that development could impact upon view into and out of the conservation area.

Suffolk County Council Archaeology noted that the development of this site would have a ‘Green’ impact.
Oulton Parish Council identifies this site as being suitable for development.

Reydon Parish Council stated that housing requirements for Southwold and Reydon could be met on site 142, together with some infill developments in Reydon and modest expansion of the village envelope as specified by the rural exceptions policy (DM22).

Southwold Town Council stated that the number of dwellings on this site is a gross over estimation and will not be included in the Southwold Neighbourhood Plan. This would result in a density of 137.9 dwellings per hectare, not the 77.7 dwellings per hectare which is the current average density of new build in Southwold. Housing without gardens is attractive to second home owners and buy to let. Southwold is seeking to limit these purchasers and to rebuild its population. This involves creating houses for families and older retired people who prefer houses with gardens. The town wants to provide a range of houses for a more varied demographic, in line with the NPPF.

Southwold and Reydon Society stated that this is a key site on the entrance to Southwold, which should be developed for housing. Development will need to be of a high quality given its prominent location and address the following issues: mitigating flood risk on the lower part of the site; providing off street parking; sewerage infrastructure (the whole sewerage network is at or beyond capacity).

No comments submitted by developers or landowners in response to this site.

Members of the public were supportive of development on this site because it is located on brownfield land within the development limits. Two respondents sought to draw attention to other brownfield sites within the town. However there was concern that development on the site should include high standards of design because of its prominent location on the edge of Southwold. Development should also include an off road parking scheme. There was concern that this site would be at risk of flooding because of its low lying location and so housing on the site will require flood protection. It was also stated that the capacity of the sewage network has already been exceeded.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints or impacts that cannot be mitigated. Development on this site would be in a highly prominent location facing the AONB to the north. The site is located close to the Southwold conservation area and sits at the entrance to the town. New buildings would therefore impact upon the settlement fringe and built historic environment of the town. The Settlement Fringe Landscape Sensitivity Study maps show that this site is next to a sensitive urban fringe. It also borders a landscape area to the west with a low capacity for development because of its low sensitivity and very high value. This means that development on this site will require careful attention to design, so that it is sensitive to the landscape and nearby historic buildings. Traffic from the new development would exit onto the busy Station Road and means that road access will require careful attention. The northern part of the site is located in flood zone 2, which will require mitigation if the site is to be redeveloped.

The adjacent site contains a garage which could cause disturbance for future residents on this site.
Development on this site would require improvements to the foul sewer network. A sewer pipe and electricity lines also cross the site.

This site has capacity for 15 new dwellings, however this is based on the fact that the new dwellings located in the flood zone would pass the exceptions test. If they do not, the site would not be able to accommodate any new dwellings.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that it could impact upon the nearby conservation area and historic buildings.

Minor positive effects include that development would help to meet the housing needs of the local population. It would also be well located for access to shops, services, health facilities and local employment opportunities. This site could also encourage sustainable movement patterns.

Development of this site would lead to the closure of Southwold Police Station unless an alternative venue can be found within the town.

Mitigation measures require the use of good design, which is sensitive to the historic environment of Southwold and the AONB to the north.

**Conclusion**

This site is not suitable for allocation in the Local Plan. There are alternative sites that are not at risk of flooding and therefore allocation of this site would be contrary to national planning policy. Allocation of this site may be better considered as part of the Southwold Neighbourhood Plan.
Site 189 - Land south of Wangford Road, Reydon

Suggested Use: Housing
Site Area: 10.87

This site is a long, thin strip of land that borders the eastern side of the old Reydon High School and its football pitches. It is set in an area of large open fields bordered by hedges and a mature hedge runs down the western flank of the site.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
This site was not included in the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment has not identified any constraints or impacts that cannot be mitigated. Access is possible via Copperwheat Avenue. Development of the entire site would have a negative impact on the AONB landscape, which would be difficult to mitigate. The Settlement Fringe Landscape Sensitivity Study identifies this site as being part of an area of historic farmland, which has low landscape sensitivity but is also of a very high value, meaning that capacity for new development is low. This site is a large open site surrounded by hedges which contributes to the urban fringe and the surrounding landscape.
However it is possible that the south east of the site, which is bounded by existing development and playing fields on two sides, could be developed. Development could also occur on the northern end of the site, to the north of the playing field extension. Land directly to the west of the playing field would not be suitable for development. This could be extended along the Wangford Road towards the hedge on the western edge of the site. A mature hedge borders the hedge to the west and there are tree preservation orders on the north east edge of the site. There is a pond on the western edge of the site. The northern and south eastern parts of the site contain areas of surface water flood risk.

The assessment has identified that this site could be delivered in conjunction with site 202 to the south and has the capacity to deliver 250 dwellings at a density of 20 dwellings per hectare. 5.76 hectares on the southern portion of the site can be developed. The middle section which flanks the western edge of the playing field and the northern section which borders Wangford Road are not suitable for development because they would have a greater impact upon the surrounding landscape. Developing the northern section of the site may also impact upon the setting of Reydon church.

This site could accommodate 132 new dwellings.

Summary of Draft Sustainability Appraisal

The draft Sustainability Appraisal identified that development on this site would have a significant negative effect upon the landscape. New housing would have a major impact upon the open countryside in the AONB, however, this would be significantly reduced if only the southeast corner of the site were developed. The site would also have minor negative effects on natural resources through the loss of undeveloped land.

Minor positive effects are that development would help to meet the housing needs of the local community and that it would be well situated for access to shops, services, employment opportunities, open space and health facilities. This site could also encourage sustainable movement patterns.

There is potentially a negative impact on the historic environment.

Mitigation measures include restricting development to the southeast corner of the site in order to reduce landscape impact. Development should conserve and enhance trees and hedgerows that surround this site; it should also enhance the urban fringe along the western edge of Southwold.

Conclusion

Development in the south of the site would have a more limited impact on the landscape provided a landscaping scheme is implemented, existing trees and hedgerows are retained and the density of development is kept low. Development should also be limited to the southern part of the site, south of the playing fields. As such, the southern part of the site has been allocated by Policy WLP6.1 together with site 202 to the south for 250 dwellings in the First Draft Local Plan.
Site 202 - Land north of Keens Lane, Reydon

Suggested Use: Housing
Site Area: 6.27

This site is located to the south of site 189 and is enclosed in the landscape by existing residential areas to the south and east. Residential uses and football pitches help to enclose the site to the north. Mature hedgerow and trees flank the site to the south.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
This site was not included in the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
The assessment has not identified any constraints that cannot be mitigated.

Development on this site would form an incursion into the countryside and the Area of Outstanding Natural Beauty. However it is well contained in the landscape, being bordered on two sides by existing development. Therefore limited development on this site would be acceptable. The Settlement Fringe Landscape Sensitivity Study identifies this site as being part of an area of historic farmland. This landscape has a low sensitivity but is also of a very high value, meaning that it has a low capacity to accommodate
new development. This site is next to the edge of Reydon, which is a sensitive urban fringe. However the enclosed nature of this site means that it does not make the same contribution to the landscape that other sites in more exposed locations would. It is therefore likely that landscape impact issues could be overcome.

There is an area at risk of surface water flooding in the south east of the site.

Road access from The Crescents is possible but this is via narrow estate roads. Input from Suffolk Highway Authority is needed.

Thick hedges and mature trees border the site to the south and east and there is a tree preservation order to the south east of the site. A buffer would have to be provided to west of the site to protect the setting of a listed building (Gorse Lodge).

The assessment identifies that this site has a capacity for 112 dwellings at a density of 22 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The draft Sustainability Appraisal did not identify any significant effects. Minor negative effects were that the site is classified as grade 3 agricultural land.

Minor positive effects include that this site would help meet the housing needs of the local population and the site is well located for access to shops, services, health facilities, playing fields and employment opportunities. This site could also encourage sustainable movement patterns.

Landscape impact is uncertain because although the site forms an extension into the countryside it is bounded by existing development on two sides and is well enclosed in the landscape. Therefore it is not clear what, if any, effect on the landscape the proposed development will have. There is also uncertainty about the effect upon biodiversity and the historic environment arising from development on this site.

Mitigation measures include the use of low rise, well designed houses that will have a minimal impact on the landscape. Development should preserve and protect the trees and hedges that surround this site. It should also enhance the urban fringe along the western edge of Reydon. New housing should be accompanied by the provision of play space to help meet local needs and it should also provide access to local footpaths and the surrounding countryside.

**Conclusion**

Development of the site would have a more limited impact on the landscape provided a landscaping scheme is implemented, existing trees and hedgerows are retained and the density of development is kept low. As such, the site has been allocated by Policy WLP6.1 together with site 189 to the north for 250 dwellings in the First Draft Local Plan.
Site 208 - Broadside Park Farm, Reydon

Suggested Use: Housing  
Site Area: 33.57

This is a large site that slopes down towards Buss Creek to the south. The northern part of the site is very exposed but the southern part of the site is used to grow crops and the southern boundary contains a mature hedge with trees.

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site was not included in the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Significant issues which could not be overcome are the impact on the landscape and areas of biodiversity value. The main problem with development on this site is large scale impact upon the surrounding landscape (which is part of the AONB and the Heritage Coast), which could not be mitigated. This site is situated in a highly prominent location with excellent views towards Southwold to the south. The Settlement Fringe Landscape Sensitivity Study identifies this as an area with low capacity for future development. The site has low landscape sensitivity but is of very high landscape value. This site is an
important part of the landscape because of its prominent and exposed location. This is a large site which covers most of the land to the east of Reydon and overlooking Southwold and it would be highly visible in the landscape. Impact of development on this site could not be mitigated.

Development would also impact upon a statutory wildlife site and is close to the Coastal Change Management Area. It is possible that development on this site would be vulnerable to coastal erosion in the future.

Electricity lines cross the site form north to south and east to west.

The southern part of the site is also at risk from flooding.

The nearby pig farm has the potential to cause issues with noise and odour.

The Historic Environment Record indicates remains dating from WWII.

Summary of Draft Sustainability Appraisal
The draft Sustainability Appraisal identified that development on this site would have a significant negative effect upon the landscape. The site is highly exposed from all directions and is an important part of the landscape to the north of Southwold. Mitigation measures would not be possible and development would harm the appearance of the AONB. Minor negative effects include the impact upon biodiversity and the loss of a large area of greenfield land.

Minor positive effects include that development would help to meet the housing needs of the local community, the site is located close to services, facilities and employment.

Development would also be located within 30 metres of the Coastal Change Management Area and it is possible that properties could be affected by coastal erosion in the future.

Mitigation of landscape impact is not possible for development on this site.

Conclusion
This site is not suitable for development because of its significant negative effect upon the Area of Outstanding Natural Beauty and Heritage Coast, which could not be mitigated.
Rural Area

All Saints South Elmham

Site 66 - Land north of 1-4 East View, All Saints South Elmham

Suggested Use: Housing
Site Area: 0.17

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on listed buildings:

- The Willows and barn to the north are Grade II listed;
- Moat Farmhouse to the east is Grade II listed;
- All Saints cottage to the south is Grade II listed;
- Whaleys to west is Grade II* listed;
- The Elms to the west is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access to the site is off The Street which may be too narrow for some traffic.

A sewer pipe crosses the site.

There is a risk of surface water flooding to the south and west of the site.

The land is greenfield. Woodland borders the site to the north and a tall hedgerow to the west, south and east. Development would be highly visible from the south east and may change the character of the area.

A woodland and a stream to the north may provide habitats as could hedges to the west.

There is a scattering of older buildings along the edge of All Saints Common.

The site has capacity for approximately five dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were identified in relation to access to services and facilities, the loss of Grade 3 agricultural land, the impact on the historic environment and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing and the impact on the landscape.

Mitigation would be difficult on this site due to it being a greenfield site.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. This site is not considered suitable for allocation in the Local Plan.
Site 100 - Land south of 1-4 North End, All Saints South Elmham

Suggested Use: Housing
Site Area: 0.11

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact upon setting of high Grade and other listed buildings:

- The Willows and Barn to the north is Grade II listed;
- Moat Farmhouse to the east is Grade II listed;
- All Saints cottage to the south is Grade II listed;
- Whaleys to west is Grade II* listed;
- The Elms to the west is Grade II* listed.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Red’ impact (historic buildings and landscape). Full details can be found on the Council’s website.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site is off St James Road.

A sewer pipe crosses the site.

The land is greenfield and is surrounded by trees to the south. Hedges and trees block views of housing next to the common. However development on this site would be highly visible form the east and west.

There is potential for archaeological finds near the Grade II listed cottage opposite the site.

The site has capacity for approximately five dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land, lack of services, the impact on the historic environment and the impacts on sustainable movement patterns. There is a potential impact on the landscape relating to the visibility of any development.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. This site is not considered suitable for allocation as part of this Local Plan.

Ashby

Site 79 - Land off Blocka Road, Ashby Dell

Suggested Use: Housing
**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Historic England stated there could be potential impact upon the setting of listed buildings:
- numbers 6, 7, 8 and 9 The Dell to the south west are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (very high potential significance).

Ashby, Herringfleet and Somerleyton Parish Council stated the site was not suitable for development because it is in an unsustainable location with no facilities or infrastructure. It would overwhelm the existing settlement.
Somerleyton Estate said the site is suitable, available, achievable and viable. The site benefits from being located near villages that have facilities and services. The site could deliver a mix of housing types and tenures. The NPPF recognises the importance rural housing can have to the wider provision of new housing and the Waveney Plan should reflect this.

One member of the public responded suggesting a small number of dwellings could be suitable but the infrastructure and access to the site is poor.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. This would require substantial off-site infrastructure which may not be economically viable.

The site has a number of mature trees and could affect the setting of listed buildings.

There are some potential habitats located on site.

The most significant issue identified is the potential for archaeological remains on site and the potential impact on the setting of Grade II listed buildings located adjacent the site. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site has capacity for approximately five dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any constraints that could not be mitigated. Minor negative effects were associated with the impact on the landscape, listed building loss of Grade 3 agricultural land, lack of services and facilities and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the surrounding wooded landscape protect the setting of listed buildings.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. This site is not considered suitable for allocation as part of this Local Plan.
Barnby and North Cove

Site 46 - Land at Swan Lane, Barnby

Suggested Use: Housing
Site Area: 4.68

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the number of development sites considered in the village could increase recreational pressure on the Broads and have adverse effects on the landscape character and visual amenity of the area.

Historic England stated there could be potential impact on the setting of the Church of John the Baptist which is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Barnby Parish Council stated the site has been refused planning permission in the past as development would overwhelm the village.

North Cove Parish Council suggested a small number of starter homes could be appropriate on the western end of the site.

Badger Building stated the site could be brought forward for development in the early part of the plan period. The site is well located in relation to existing built development and can proceed without relying on other sites coming forward.

Nine members of the public objected to the site with six of these having objected to the principle of large-scale development in the village as a whole. Issues raised included:

- The site is located in the open countryside, outside the village envelope and there would be a loss of greenfield and agricultural land;
- Concerns were raised about the increase of traffic and the poor road network will not be able to cope. The lane is narrow and access to the A146 is difficult. Conflict will be created between pedestrians, cyclists, horse riders and vehicles;
- There is limited infrastructure in the area including no connection to the gas or sewerage network, poor drainage and flooding and the school is over subscribed;
- There is no local employment available;
- Over development will adversely affect the rural character and the dynamics of the village with executive dwellings attracting people that have no connection with the settlement;
- The site is located close to the Barnby Nature Reserve and a Site of Special Scientific Interest. Development will adversely affect the environment and wildlife with increased noise and light pollution;
- Development would set an unacceptable precedent.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to accommodate development.

Small area on the west of the site with high surface flood water risk, as well as some low risk areas.

The land is greenfield. There is a small area of high surface water flood risk and there is a Tree Preservation Order on site. At a strategic level the Settlement Fringe Study suggests this site is in an area that has low landscape sensitivity and high capacity to support development.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.
Access from a small country lane with no footway or cycle access. A bus stop is located nearby, however development could have an impact on local junctions.

Reflecting local character and housing density in the local area the site has capacity for 84 dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land, the loss of hedgerows and the risk of flooding associated with climate change. This site could also have a negative impact on sustainable movement patterns. There is a potential negative impact on the historic environment due to the proximity of important local buildings.

Minor positive effects were identified in relation to the proximity of services and facilities and the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

Development of this site would have a negative effect on the quality of the townscape by reducing the rural character of the area, however, quality design of low density could contribute towards mitigating this impact. The site has potential for archaeology to be found. The nearest listed building is located on the eastern side of the A146 and development should mitigate any impact. Potential development is likely to have an adverse impact on Swan Lane unless widened and this makes the site less preferable than other sites being considered in the village. This site is not considered suitable for allocation as part of this Local Plan.

**Site 48 - Land at The Green, Barnby**

Suggested Use: Housing
Site Area: 4.07
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the number of development sites considered in the village could increase recreational pressure on the Broads and have adverse effects on the landscape character and visual amenity of the area.

Historic England stated there could be potential impact on the setting of the Church of John the Baptist which is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

Barnby Parish Council state the proposed development is too large for the size of the village, Swan Lane is too narrow for additional traffic and the site is currently used for agriculture.

North Cove Parish Council stated the site is visually intrusive, extends into the open countryside and has poor access.
Badger Building stated the site can be brought forward for development in the early part of the plan period. The site is well located in relation to existing built development and can proceed without relying on other sites coming forward.

One member of the public supported the site suggesting site would be improved by removing the old agricultural building and provide land for housing and public open space that could be designed as a village green to create a focal point in the village. New development would support businesses in the village and increase the viability of the school.

There were five members of the public who objected to the proposed site citing the following issues:

- located in the open countryside, outside the village envelope and there would be a loss of greenfield and agricultural land;
- concerns were raised about the increase of traffic and the poor road network will not be able to cope. The lane is narrow and access to the A146 is difficult. Conflict will be created between pedestrians, cyclists, horse riders and vehicles;
- there is limited infrastructure in the area including no connection to the gas or sewerage network, poor drainage and flooding and the school is over subscribed;
- there is no local employment available;
- the scale of proposed development will adversely affect the rural character of the village;
- the site is located close to the Barnby Nature Reserve and a Site of Special Scientific Interest. Development will adversely affect the environment and wildlife with increased noise and light pollution;
- such development would set an unacceptable precedent.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Siding Road but roads are narrow and there are no footways connecting the site to the village facilities.

Improvements to the foul sewer network would be needed to support development. Telephone cables run across the edge of the site.

The land is greenfield with parts of the site located within flood zones 2 and 3. There are areas of high surface water flood risk.

The site is located within a Tributary Valley Farmland landscape character area and forms part of a remnant ancient landscape. At a strategic level the Settlement Fringe Study suggests this site is in an area of high landscape sensitivity and has low capacity to support development.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site has potential capacity for 61 new dwellings.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the setting of the Broads, loss of Grade 3 agricultural land, flooding associated with climate change, the loss of hedgerows and a ditch, the impact on the views of a local church and the impact on sustainable movement patterns. There is a potential negative impact on water quality as the local wastewater recycling centre requires improvements.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible. Provision of footways would connect the site to the village but these would in all likelihood need to be delivered in conjunction with site 46 to enable widening of Swan Lane.

Conclusion

The site has a number of constraints and development could adversely affect the settlement. Parts of the site are at risk from surface water flooding and would need to be mitigated through sustainable drainage systems. The site has potential for archaeology to be found and a development to have an adverse impact on a Grade II listed building. Development of this site would have a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside. The area contributes towards the setting of the Broads and this could be adversely affected. For these reasons the site is not considered preferable for development compared to other sites being considered in the village. This site is not considered suitable for allocation as part of this Local Plan.

Site 57 - Land between The Street and A146, Barnby

Suggested Use: Housing
Site Area: 2.80
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the number of development sites being considered in the village could increase recreational pressure on the Broads and have adverse effects on the landscape character and visual amenity of the area.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Barnby Parish Council stated the proposed site is the best of the sites put forward but is too large and if considered further should only be developed in part. Traffic will not be required to travel through the village to access the site. Site is currently used for agriculture. This would address housing need and be suffice to demonstrate Barnby’s contribution towards the housing needs of the District.

North Cove Parish Council stated the site provides visual amenity and the development would dominate the landscape. Sewerage facilities in the area are inadequate.
One member of the public commented that a limited amount of development on the site may be appropriate if it was small in scale.

There were two objections by members of the public to the proposed site citing the following issues:

- located in the open countryside, outside the village envelope and there would be a loss of greenfield and agricultural land;
- concerns were raised about the increase of traffic and the poor road network will not be able to cope. The lane is narrow and access to the A146 is difficult. Conflict will be created between pedestrians, cyclists, horse riders and vehicles;
- there is limited infrastructure in the area including no connection to the gas or sewerage network, poor drainage and flooding and the school is over subscribed;
- the scale of proposed development will adversely affect the rural character of the village;
- the site is located close to the Barnby Nature Reserve and a Site of Special Scientific Interest. Development will adversely affect the environment and wildlife with increased noise and light pollution;
- such development would set an unacceptable precedent.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. Power lines also cross the site.

The land is greenfield, Grade 2 agricultural land, and is located in a Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has very low capacity to support development because of its contribution towards the Broads. However, while it shares the same fundamental character features as the area north of the village with which it has been grouped the site is separated by the built up area and the protected area. Therefore, it is not considered that it contributes towards the setting of the Broads.

The site has potential capacity for approximately 45 new dwellings at 20 dwellings per hectare. This includes the provision of 0.28 hectares of open space.

Summary of Draft Sustainability Appraisal

A significant negative impact was associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the landscape, the loss of hedgerows and the impacts on sustainable movement patterns. There is a potential impact on water quality as the local wastewater recycling centre requires improvements.
Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities. Additional tourism in the area could have benefits for the rural economy.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. The use of screening is required to mitigate impact of the A146 traffic. Hedgerows should be protected and reinforced. The provision of an equipped play space equivalent to a LEAP (local equipped area for play) with a frontage onto The Street would address the existing deficiency.

Conclusion

The site is well related to the existing village and located opposite the primary school. Footways are available to provide accessibility to the village and the site is located along a signed cycle route, however, there is no infrastructure in place to support this.

While the site has been identified as having very low capacity for development in the Settlement Fringe Assessment this particular area is contained within the landscape and does not contribute towards the setting of the Broads. Development of this site is likely to have a limited impact on the quality of the landscape and rural character of the area as it is contained by existing development and the A146.

The site consists of higher quality agricultural land compared to most other sites, however, its relationship with the existing built up area outweighs this negative attribute. For these reasons the site is considered to be suitable for development. To mitigate concerns of visual amenity a scheme should be designed to have a low density street frontage and provide an equipped play area to serve the development and meet the need in the area.

This site has been allocated under Policy WLP7.2 of the First Draft Local Plan for 45 dwellings and an equipped play space equivalent to a LEAP (local equipped area for play).
Site 83 - Land off Mill Lane, Barnby

Suggested Use: Housing
Site Area: 0.92

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the number of development sites being considered in the village could increase recreational pressure on the Broads and have adverse effects on the landscape character and visual amenity of the area.

Historic England stated there was potential impact upon the setting of a Listed Building and Scheduled Monument:

- Wade Hall to the north is Grade II listed;
- Wade Hall Moated Site is a Scheduled Monument.
Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.

Barnby Parish Council stated that the site is located at the end of a single track lane and is difficult to access. Currently used for agriculture.

North Cove Parish Council stated the access was poor and there is a risk of increasing flooding around The Drain.

The Suffolk Wildlife Trust stated the site might support habitats and species of conservation value. The site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

Five members of the public commented and objected to the site raising the following issues:

- located in the open countryside, outside the village envelope;
- concerns were raised about the increase of traffic and the poor road network will not be able to cope and access to the A146 is difficult;
- there are few services and facilities in the village and new development over stretch these;
- the scale of proposed development will adversely affect the rural character of the village;
- the site is located close to the Barnby Nature Reserve and a Site of Special Scientific Interest. Development will adversely affect the environment and wildlife with increased noise and light pollution;
- such development would set an unacceptable precedent.

The landowner has withdrawn this site from further consideration.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site is accessed off a private drive from Mill Lane.

Foul sewerage improvements would be needed to support development.

The site is located in the Tributary Valley Farmland character area. The Settlement Fringe Study identified the areas as having a moderate sensitivity, moderate value and low capacity due to its contribution to the setting of the Broads. The site is contained in the landscape however it would create an exposed settlement edge. The slope of the site limits the capacity for development.

Hedgerows and mature trees found on site could provide habitats for local wildlife. There is also a waterway to the north east of the site.

The size of the site means it is likely to have an impact on the local road network.
This site is no longer available for development.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, the loss of Grade 3 agricultural land, the loss of habitats that could support biodiversity and the effects on sustainable movement patterns.

Minor positive effects were associated with the proximity of local services and facilities. A potential impact could be the provision of housing to meet local need, however the size of the site limits this potential.

Mitigation measures identified in the appraisal included planting along the northern boundary to promote integration.

Conclusion

The landowner has withdrawn this site from further consideration.
Site 90 - Land on The Hill, Barnby

Suggested Use: Housing
Site Area: 1.40

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the number of development sites being considered in the village could increase recreational pressure on the Broads and have adverse effects on the landscape character and visual amenity of the area.

Historic England stated there was potential impact on the setting of the Garden House to the west which is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Barnby Parish Council stated that part of the site is already subject to a proposal for affordable housing. The Parish Council has supported this application.

North Cove Parish Council stated the site proposes development in the open countryside. Development of the site will cause flooding. Site contributes towards green infrastructure in the area.

Wellington Construction Limited has stated the site could support a development of 25-45 dwellings, is viable and could be brought forward in the early part of the plan period. The site could consolidate the current proposal for affordable dwellings on the northern part of the site and potentially be considered as a scheme in conjunction with proposed site 57 to the east. The precedent of the previous application indicates development of this site should not significantly impact on the rural setting of the village. The site is categorised as Grade 2 agricultural land but is currently fallow and used for grazing. The need to consider greenfield sites is essential given the slow progress to date of the Lake Lothing area in Lowestoft. The site can contribute towards the Council’s five year housing supply and housing strategy.

Four members of the public commented on the site. Two people suggested the site was proportionate to the size of the village, however, an environmental impact assessment should be carried out. Two people objected to the site based on the following issues:

- there is no mains drainage and flooding will occur;
- a Site of Special Scientific Interest is locate nearby;
- the site is poorly located, the road network is limited and access to the A146 is difficult.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. Power lines also cross the site.

There are significant areas of surface water flooding risk to the north of the site.

The land is greenfield and located within a Tributary Valley Farmland landscape character area. There are TPOs on the site. There is a pond near the site boundary. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has very low capacity to support development because of its contribution towards the Broads. However, it is separated from the Broads by the built up area and is therefore not considered to have an adverse impact on its setting.

Hedgerows and trees on the eastern boundary as well as a pond could help support local biodiversity.

The site has potential capacity for approximately 25 dwellings at 18 dwellings per hectare.

Summary of Draft Sustainability Appraisal
A significant negative impact was associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the effects of climate change and the impacts on sustainable movement patterns. There are potential impacts on local water quality and biodiversity associated with the waterway.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities. There is a potential impact on the landscape due to the area being contained with the current urban area.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. An ecology study is required to investigate biodiversity associated with the waterway. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site lies within the existing built up area and lies in the gap between Barnby and North Cove, however, will contribute towards the merging of the two settlements along the south side of The Street. There is an extant planning permission on the northern part of this site. The site is located within the catchment of the open space and play area located at Pinewood Gardens and the primary school is not far away. Access to these facilities is available along footways. The site is located along a signed cycle route, however, there is no infrastructure in place to support this.

There is potential for archaeology to be found but this is relatively low and there is unlikely to be any impact on heritage assets with the nearest listed building being located west of the existing built up area.

Development of this site is likely to have a limited impact on the quality of the landscape and rural character of the area as it is contained by existing development and the A146. The site consists of higher quality agricultural land compared to most other sites, however, its relationship with the existing built up area outweighs this negative attribute.

The site is traversed by a small water way and is prone to surface water flooding. The volume of development could have an adverse impact on the site access and for these reasons the site is not considered to be a ‘preferred option’ to be taken forward in this Local Plan.

**Site 132 - Orchard Farm, New Road, Barnby**

Suggested Use: Housing
Site Area: 2.02
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building:

- Ash Farmhouse to the east is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Barnby Parish Council stated the site has been subject to failed planning applications and holiday lets and currently has a farm shed on site which is disproportionately large for the scale of the farm.

Two members of the public objected to the proposed site citing the following reasons:

- the site is greenfield, is located outside of the village envelope and extends into the open countryside;
- the development is too large and would adversely affect the rural character of the village including increased noise and sound pollution;
- there are few services and facilities available;
● the lane is narrow and there is difficulty joining the A146;
● it would set an unacceptable precedent.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site can be accessed from New Road which is a small country road that would not be suitable to accommodate development. There are no footways providing access to the village. The site is located along a signed cycle route but this is not supported by any infrastructure.

Foul sewerage improvements would be needed to support development. Power lines traverse the site.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is flat and exposed to the wider landscape and is poorly related to the existing settlement.

**Summary of Draft Sustainability Appraisal**

A significant negative impact was associated with the loss of Grade 2 agricultural land. Minor negative effects are associated with the impact on the landscape, the loss of hedgerows and the effects on sustainable movement patterns. There could be an impact on local water quality as the local wastewater recycling centre requires improvement.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows should be protected and enhanced where possible.

**Conclusion**

The site is not well related to the existing village and is isolated in the open countryside. Development of this site would have a negative effect on the quality of the landscape by reducing the rural character and increase the sense of development in the area by creating a built up area with prominent settlement edges in the open countryside. Development on this site would result in the loss of Grade 2 agricultural land when other sites are available categorised as Grade 3. There is limited access to services and facilities in the area and access to the village is not supported with any infrastructure such as pavements. Overall, the location of the site and its availability do not outweigh the negative aspects of the site in comparison for others. This site is not considered suitable for allocation as part of this Local Plan.
Blundeston

Site 20 - Hall Road, Blundeston

Suggested Use: Housing
Site Area: 0.34

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a Listed Building:

- Blundeston House to the north west is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
One member of the public commented the site could have advantages should development take place on the land between the former prison site and Church Road if the road network could be addressed but as submitted the site is unrelated to the village envelope.

One member of the public objected to the site and large-scale development in Blundeston as a whole based on the following issues:

- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- poor parking provision and overdevelopment has created a maze of on-road parked vehicles
- adverse impact on the character of the village;
- the site could be planted as woodland to improve the environment for wildlife.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is a very small amount of low and medium surface water flood risk land on the west of the site.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. This site is exposed to the wider rural landscape.

The site has capacity for approximately 7 dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

Significant negative effects are associated with the loss of Grade 1 agricultural land. Minor negative effects were related to the impact on the landscape and the effects on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and there is access to services and facilities.

Mitigation measures to improve access to services and facilities could include the improvement of pedestrian and cycling connections to North Lowestoft. Existing hedgerows should be protected and enhanced where possible.

Conclusion

This site is isolated from the main part of the village by agricultural fields all of which is classified as agricultural land. Listed buildings are located to the east and north and while there may be an adverse impact on the setting of these buildings the impact is unlikely to be significant. The former prison site to be redeveloped is adjacent to the south, however, the site is also poorly related to this area. Overall, the site
will have an adverse impact on the landscape and character of the village compared to other sites being considered. This site is not considered suitable for allocation in this Local Plan.

**Site 27 - Land off The Loke, Blundeston**

Suggested Use: Housing
Site Area: 0.43

*Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation*

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, a ‘Green’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Five members of the public objected to the proposed site with three of these having objected to the principle of large-scale development in the village as a whole citing the following reasons:
- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
• road network in the area is poor and will not be able to cope with additional traffic particularly with existing issues related to on-road parking and school traffic;
• Market Lane is narrow with on-street parking and visibility being an issue;
• there is a lack of infrastructure to support new development (shop, doctors surgery, schools);
• development of the site will have an adverse impact on the rural character of the village;
• the site is greenfield land, development will extend into the open countryside and would have an adverse impact on wildlife. It was suggested the site could be planted as woodland to improve the environment for wildlife.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is potential access to the site from The Loke.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is set between two residential buildings but is exposed to the wider landscape.

There is potential for archaeological finds on the site and a programme of archaeological work will be required through a planning condition.

The site has capacity for approximately 5 new dwellings.

Summary of Draft Sustainability Appraisal

A significant negative effect was associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the impact on the landscape and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and there is access to services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape using screen. Existing hedgerows and trees should be protected and enhanced where possible. Improvements are needed to pedestrian and cycling connections to North Lowestoft.

Conclusion

The site is located on the northern edge of the village and is accessed by an unadopted lane. On its own the site is unsuitable for development as this would increase the prominence of the settlement in the open countryside and is not well related to the existing built up area. The site is isolated and the scale of
development would not provide significant benefit for the community compared to other sites being considered. In isolation, the benefits of bringing this site forward are not sufficient to counter the potential impacts on the landscape. This site is not considered suitable for allocation as part of this Local Plan.
Site 29 - Land adjacent Millennium Green, Church Road, Blundeston

Suggested Use: Housing
Site Area: 1.67

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Mary is Grade I listed;
- The Pound is Grade II listed;
- The Rookery is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Thirteen members of the public have objected to the proposed site with nine of these having objected to the principle of large-scale development in the village as a whole. The following issues were raised:

- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- adverse impact on heritage assets;
- the development is on greenfield land, extends into the open countryside and will have an adverse impact on the environment and wildlife. It was suggested the site should be planted as woodland to improve the environment for wildlife;
- the road network in the area is poor and will not be able to cope with additional traffic with on-road parking and school traffic being particular issues along with additional conflict being created between pedestrians, cyclists and vehicles. The site has issues related to safe and easy access;
- there is a lack of infrastructure (sewerage, gas, doctor surgeries, shop, schools, public transport, broadband; drainage and flooding);
- most of the employment in the area is located in South Lowestoft and development should be located in that area;
- Waveney District Council’s comments provided as part of the Site Specific Allocations stated the site was unsuitable and nothing has changed;
- two people commented that smaller developments (less than 10 dwellings) may be acceptable but not developments of this scale which will adversely affect the character of the village.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development.

There are small areas on site that are at risk of surface water flooding.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is flat and contained but is exposed to the church along the west corner.

There is potential impact on the Grade II listed Rookery and Grade I listed St Mary’s Church is located to the west. The Pound located at the Pound Lane junction is also listed.

The site has capacity for approximately 25 new dwellings at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the loss of Grade 1 agricultural land and potential impact on listed buildings. Minor negative effects were associated with the impact on biodiversity, the effects of climate change and the impacts on sustainable movement patterns.
Minor positive effects were identified in relation to the provision of housing that could meet a local need, access to services and facilities and the impact on the landscape.

Mitigation measures could include the design of the scheme to be set within the townscape and reflect the importance of the listed buildings. Properties facing onto Millennium Green would increase natural surveillance of the open space. Existing hedgerows and trees should be protected and enhanced where possible. Improving pedestrian and cycling connections to North Lowestoft would increase access to services and facilities.

Conclusion

The site is well located with respect to the existing built up area and of an appropriate scale compared to other sites. Development of the site would result in the loss of high quality agricultural land. There are three listed buildings adjacent the site and any scheme would need to be of a high quality design that could mitigate any potential significant impacts that could arise. Additionally, the character of the Millennium Green would need to be protected. The site is accessible from Church Lane and Pound Lane. Existing footways along the former provide access to services and facilities in the village. The redevelopment of the former Blundeston Prison site will provide new housing during the early part of the plan period.

The potential effect on listed buildings nearby could have an adverse impact on the character of the settlement and therefore the site is considered to be less preferable than other sites in the area. This site is not considered suitable for allocation as part of this Local Plan.
Site 42 - Land at Market Lane, Blundeston

Suggested Use: Housing
Site Area: 7.02

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of The Plough which is Grade II listed.

Suffolk County Council stated the site was not desirable because of the limited facilities and services with reasonable distance and the limited capacity of the road network. If significant development was to take place along with the prison site a comprehensive review of transport issues will need to be undertaken which could include enhancement of transport infrastructure and services.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Red’ impact (very high potential significance).

Badger Building stated the site can be brought forward for development in the early part of the plan period. The site is well located in relation to existing built development and can proceed without relying on other sites coming forward.

Twenty three members of the public objected to the proposed site with eleven of these having objected to the principle of large-scale development in the village as a whole. The following issues were raised:

- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- the development is on greenfield land, extends into the open countryside and will have an adverse impact on the environment and wildlife. It was added the site should be planted as woodland to improve the environment for wildlife;
- the road network in the area is poor and will not be able to cope with additional traffic. On-road parking and school traffic are particular issues along with additional conflict being created between pedestrians, cyclists and vehicles. The site has issues related to safe and easy access;
- there is a lack of infrastructure (sewerage, gas, doctor surgeries, shop, schools, public transport, broadband; drainage and flooding);
- most of the employment in the area is located in South Lowestoft and development should be located in that area;
- concerns were raised about the impact on existing properties including loss off views, privacy and negative impact on house values;
- small sites could fit in with the village to meet the needs of the village but the scale of this development is too large and will adversely affect the rural and built character of the area including heritage assets and the dynamics of the village.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. A sewer pipe also crosses the site.

There is a small area at risk of surface water flooding in the north west of the site.

The land is greenfield. The site is located within a Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. Development is contained on all sides except the east where it has the potential to create an exposed settlement edge.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.
The site could accommodate approximately 140 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the impact on the historic environment and the effects of climate change.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services and facilities. There is a potential impact on the landscape due to the contained nature of the site.

Mitigation measures could include the design of the scheme to be set within the landscape using screening. Existing hedgerows and trees should be protected and enhanced where possible. Improve pedestrian and cycling connections to North Lowestoft.

**Conclusion**

The site is well located with respect to the village hall, playing fields and the public house, however, the scale of development could have an adverse impact on the townscape, character of the village and existing infrastructure. The scale of development is inappropriate and could adversely affect the village, particularly in conjunction with the redevelopment of the former Blundeston Prison site in the early part of the plan period. Development of the site would result in the loss of a significant amount of Grade 1 agricultural land compared to other sites considered. There is high potential to find archaeology on site. Footways exist along Market Lane which could serve a development, however, the roads are narrow and there is poor connectivity to Lowestoft for cyclists reducing the potential for sustainable forms of travel used. For a large-scale development this is compounded by the lack of a bus service.

Development of the site could result in adverse impacts on the character of the village compared to other sites being considered. This site is not considered suitable for allocation as part of this Local Plan.

**Site 49 - Land at The Homestead, Lound Road, Blundeston**

Suggested Use: Housing
Site Area: 0.88
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact upon the Park and its setting:
- Somerleyton Park is listed as a Historic Park and Garden.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Badger Building stated the site could be brought forward for development in the early part of the plan period. The site is well located in relation to existing built development and can proceed without relying on other sites coming forward.

Seven members of the public have objected to the proposed site with three of these having objected to the principle of large-scale development in the village as a whole. Issues raised included:
- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- the development is on greenfield land, extends into the open countryside and will have an adverse impact on the environment and wildlife. It was suggested the site could be planted as woodland to improve the environment for wildlife;
- the road network in the area is poor and will not be able to cope with additional traffic. On-road parking and school traffic are particular issues along with additional conflict being created between pedestrians, cyclists and vehicles. The site has issues related to safe and easy access;
- there is a lack of infrastructure (sewerage, gas, doctor surgeries, shop, schools, public transport, broadband; drainage and flooding);
- most of the employment in the area is located in South Lowestoft and development should be located in that area;
- small sites that could fit in with the village could have potential but the scale of this development is too large and will adversely affect the rural and built character of the area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There are potential issues with the foul water network.

There are areas of low, medium and high surface water flood risk on site.

The land is greenfield and lies within settled farmland. The site is contained and flat.

Hedgerows run along the southern boundary and some parts of the east and west. A small pond is located in the south west corner.

The site could accommodate approximately 16 new dwellings at 18 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect was associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the impact on climate change and the impacts on sustainable movement patterns. There is a potential impact on the landscape.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to local services.

Mitigation measures could include the improvement of pedestrian and cycling connections to North Lowestoft to increase access to services and facilities. An ecology study may be required to identify biodiversity associated with the pond. Existing hedgerows and trees should be protected and enhanced where possible. A proposal should provide a pedestrian connection to the Public Right of Way south of the site.
Conclusion

The site is well related to the built up area and is contained by existing development. There is likely to only be a small impact on the landscape and the least compared to other potential sites. The site is accessible from Lound Road but there are no footways available to connect people to the village centre. To help mitigate this, a well overlooked connection to the public right of way which lies adjacent the south boundary should be provided as part of any proposal. Compared to other sites being considered this site has likely to have the smallest impact on the village.

This site has been allocated under Policy WLP7.3 of the First Draft Local Plan for a development of 16 dwellings.
Site 63 - Land East of Flixton Road, Blundeston

Suggested Use: Housing
Site Area: 12.10

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Suffolk County Council stated the site was not desirable because of the limited facilities and services with reasonable distance and the limited capacity of the road network. If significant development was to take place along with the prison site a comprehensive review of transport issues would need to be undertaken which could include enhancement of transport infrastructure and services.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (high potential significance and large allocation).
Oulton Broad Parish Council does not support the proposed site citing poor access and road infrastructure.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

The landowner, Somerleyton Estate, said the site was suitable, available, achievable and viable. There a number of facilities within the village or can be accessed in Lowestoft that contribute towards the village being a sustainable location. The site could deliver affordable dwellings needed in the area.

Fifteen members of the public have objected to the proposed site with eleven of these having objected to the principle of large-scale development in the village as a whole. Issues raised included:

- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- the development is on greenfield land, extends into the open countryside and will have an adverse impact on the environment and wildlife. It was suggested the site should be planted as woodland to improve the environment for wildlife;
- the road network in the area is poor and will not be able to cope with additional traffic. On-road parking and school traffic are particular issues along with additional conflict being created between pedestrians, cyclists and vehicles. The site has issues related to safe and easy access;
- there is a lack of infrastructure (sewerage, gas, doctor surgeries, shop, schools, public transport, broadband; drainage and flooding);
- most of the employment in the area is located in South Lowestoft and development should be located in that area;
- small sites that could fit in with the village could have potential but the scale of this development is too large and will adversely affect the rural and built character of the area including additional noise pollution and potential merging with North Lowestoft.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewer improvements would be needed to support development. A sewer pipe also traverses the site.

Small pockets of high, medium and low surface water flood risk found on site.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The western half is contained within existing development; however the eastern half is exposed to the wider landscape.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.
Access to Church Lane is blocked during school periods. A footpath is provided however there is no cycle infrastructure.

The site could potentially support approximately 181 new dwellings at 15 dwellings per hectare.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of Grade 1 agricultural land and potential impact on the Grade I listed church. Minor negative effects were associated with the impact on the landscape, the effects of climate change and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape using screening. Existing hedgerows and trees should be protected and enhanced where possible. Improvements to pedestrian and cycling connections to North Lowestoft are required.

Conclusion

The site is not well located with respect to the existing village and is likely to create an isolated residential area that encroaches into the open countryside and has prominent settlement edges. This could have an adverse impact on the character of the village and the landscape. The site is accessible from Flixton Road, however, there are no footways reducing accessibility to the village centre. There is a lack of cycle and walking facilities and public transport reduces the potential for this site to support new development. The scale of development is inappropriate and could adversely affect the village, particularly in conjunction with the redevelopment of the former Blundeston Prison site in the early part of the plan period. The scale of the site would also result in the loss of a significant amount of Grade 1 agricultural land compared to other sites being considered. There is high potential to find archaeology on site. This site is not considered suitable for allocation as part of this Local Plan.
Site 129 - Old horticultural nursery to the north of Oakleigh, Market Lane, Blundeston

Suggested Use: Housing
Site Area: 2.29

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Suffolk County Council stated the site was not desirable because of the limited facilities and services within reasonable distance and the limited capacity of the road network. If significant development was to take place along with the former Blundeston prison site a comprehensive review of transport issues would need to be undertaken which could include enhancement of transport infrastructure and services.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

Twelve members of the public objected to the site with eight of these having objected to the principle of large-scale development in the village as a whole. Issues raised included:

- redevelopment of the former Blundeston prison site should be suffice to meet the housing needs of the village;
- the development is on greenfield land, extends into the open countryside and will have an adverse impact on the environment and wildlife. It was suggested the site should be planted as woodland to improve the environment for wildlife;
- the road network in the area is poor and will not be able to cope with additional traffic. On-road parking is a particular issue and additional conflict will be created between pedestrians, cyclists and vehicles;
- the site has issues related to safe and easy access;
- there is a lack of infrastructure (sewerage, gas, doctor surgeries, shop, schools, public transport, broadband; drainage and flooding);
- most of the employment in the area is located in South Lowestoft and development should be located in that area;
- small sites that could fit in with the village character have potential but the scale of this development is too large and will adversely affect the rural and built character of the area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Pickwick Drive and The Pippins but footways along the former have not been completed.

Foul sewerage improvements would be needed and a sewer pipe crosses the site.

There could be contamination from the former stable building and brick storage facilitate located on the site.

Small pockets of high, medium and low surface flood risk.

The land is greenfield and there are areas of high surface water flood risk. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is contained to the south and west but exposed to the north, however this is well related to the existing settlement.

Hedgerows and scrub can be found on site that may provide habitats for wildlife.
There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site has potential capacity for approximately 45 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the effects of climate change, biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, access to services and facilities and the impact on the landscape.

Mitigation measures could include the design of a low density scheme to be set within the landscape using screening. Existing hedgerows and trees should be protected and enhanced where possible. Improvements are needed to pedestrian and cycling connections to North Lowestoft.

**Conclusion**

The site is located on the north boundary of the village and will result in an extension of the built up area into the. Like all sites in the Blundeston area this would result in the loss of high quality agricultural land, however, the scale of development is consistent with the character of the village.

The landscape is gently undulating and historical hedgerows and trees help to integrate the site into the wider countryside.

The location of the site is outside of the catchment for the equipped play area near the village hall, therefore, an equipped play space equivalent to a LEAP (local equipped area for play) should be provided on site. To improve accessibility any scheme should be designed to provide an access that is overlooked by neighbouring properties to the Public Right of Way located to the north west of the site. The site has qualities that lend itself to be allocated for development, however, when considered in conjunction with the redevelopment of the former Blundeston Prison site for housing is unlikely to be required in the short-term.

This site has been allocated under Policy WLP7.4 of the First Draft Local Plan for 45 dwellings (20 dwellings per hectare) with a condition the site is not to come forward until the former Blundeston Prison site has been completed.
Site 190 - Land off Hall Road, Blundeston

Suggested Use: Housing
Site Area: 6.08

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Pound Lane where traffic issues could arise as well as on Market Lane.

The land is greenfield and made up of Grade 1 agricultural land. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. Adjacent to prison but partial development could create an exposed edge.

Site covered by historic environment record.
The site has potential capacity for approximately 90 new dwellings at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the impact on the landscape, a Grade I listed building, the effects of climate change and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services and facilities.

Mitigation measures could include the design of a scheme to reflect the character of the settlement and the setting of the church and to improve pedestrian and cycling connections to North Lowestoft. Existing hedgerows should be protected and enhanced where possible.

**Conclusion**

The site is not well related to the existing built up area and its scale would result in the loss of a significant amount of high quality agricultural land. The site is accessible from Hall Road and Pound Lane but there are limited footways to connect the site to the facilities in the village and cycle connections to the employment areas in Lowestoft are poor. Adjacent the site are several listed buildings and there could be an adverse impact on the setting of and the character of the village by extending into the open countryside and creating a prominent settlement edge facing the existing built up area. For these reasons the site is not considered suitable for development. This site is not considered suitable for allocation as part of this Local Plan.
Brampton and Stoven

Site 52 - Land at Toodley Farm, Station Road, Brampton

Suggested Use: Housing
Site Area: 0.55

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Historic England stated there could be potential impact on the setting of listed buildings:

- Shingle Hall is Grade II listed;
- Brampton Old Hall is Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Substantial foul sewerage improvements and off site infrastructure would be needed to support development.

The land is Grade 3 agricultural land and is part of a field. The wider field is well screened, meaning a low density development would have a limited impact on the environment.

The site has capacity to support approximately 8 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land.

Minor positive effects were identified in relation to the provision of housing that could meet local needs. There is a potential effect on sustainable movement patterns in relation to local public transport.

Mitigation measures could include the design of the scheme to be set within the landscape using screening and reflecting local character. Existing hedgerows should be protected and enhanced where possible.

**Conclusion**

The site provides an opportunity for a limited amount of housing located along the street frontage in keeping with the character of the existing properties without significantly extending into the open countryside. Located next to the railway station and along the bus route between Southwold and Beccles this enables a choice of transport modes which can partly offset the lack of services and facilities in the vicinity.

This site has been allocated under Policy WLP7.12 of the First Draft Local Plan for 8 dwellings and open space.
Site 92 - Land on the South Side of Southwold Road, Brampton

Suggested Use: Housing
Site Area: 1.23

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity, an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Peter to the south is Grade I listed;
- Brampton Hall to the south is Grade II listed;
- The Old Rectory to the south west is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Site access can be gained off Southwold Road.

Foul sewerage improvements would be needed to support development and telephone cables traverse the site.

The land is greenfield. The site is exposed to the countryside to the south and east. Mature trees already integrate the existing buildings.

The site has potential capacity for 31 new dwellings at 25 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land and the effects on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet local needs and access to services.

Mitigation measures could include the design of the scheme to be set within the landscape using screening and reflecting local character. Existing hedgerows and trees should be protected and enhanced where possible. There is no equipped play space or open space in the village and the village hall is poorly located and this site could help facilitate such provision. Improved shared use path between the site (and the primary school) to the community centre on the western side of the A144.

Conclusion

The site is adjacent the existing built up area and will extend the settlement into the countryside. The existing built up area already affects the character of the landscape. There is good access to the road network and a limited bus service is available. In terms of community facilities the site is located opposite a primary school, however, the village hall is only accessed by crossing a busy road reducing its value to the community. Development provides an opportunity to facilitate improvements that could be required.

In isolation development of this site could create an exposed settlement edge that does not relate to the built up area, however, in conjunction with site 93 there s an opportunity to provide a limited amount of development in the village. The site has been further considered with site 93 and land to the east which together provide an opportunity to improve local facilities as site 227 which is to be taken forward as an allocated site under Policy WLP7.11 as part of the First Draft Local Plan.
Site 93 - Land on the South Side of Southwold Road, Brampton

Suggested Use: Housing
Site Area: 0.96

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Peter to the south is Grade I listed;
- Brampton Hall to the south is Grade II listed;
- The Old Rectory to the south west is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site comes from Southwold Road.

Foul sewerage improvements would be needed to support development and a sewer pipe crosses the site. Telephone cables traverse the site.

The land is greenfield. Site is flat but exposed to the south and east. Mature trees already integrate the existing buildings in the area.

The site has potential capacity for 24 new dwellings at 25 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land and the impact on the landscape.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and there is access to services. Potential effects include the promotion of sustainable movement patterns.

Mitigation measures could include the design of the scheme to be set within the landscape using screening and reflecting local character. Existing hedgerows and trees should be protected and enhanced where possible. Improved shared use path between the site (and the primary school) to the community centre on the western side of the A144. There is no equipped play space or open space in the village and the village hall is poorly located.

Conclusion

The site is adjacent the existing built up area and will extend the settlement into the open countryside, however, this influence is already created by the existing built up area. This could be mitigated through landscaping and screening. There is good access to the road network and a limited bus service is available. The site is near a primary school, however, the village hall is only accessed by crossing a busy road which limits its value to the community. On its own the site could provide a mix of housing and an equipped play space with a good street frontage. However, because of the scale of development overall benefit for the community would not be significant.

In conjunction with site 92 there is an opportunity to provide a limited amount of development in the village that will have increased benefits to the community. The site has been further considered with site 92 and land to the east which together provide an opportunity to improve local facilities as site 227 which is to be taken forward as an allocated site under Policy WLP7.11 as part of the First Draft Local Plan.
Site 95 - Land opposite 1-8 Wood End Cottages, Southwold Road, Stoven

Suggested Use: Not specified
Site Area: 0.44

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green’ impact.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Site access can be gained off Southwold Road.

Telephone cables traverse part of the site.
Site frontage has a high, medium and low surface water flood risk.

The land is greenfield and is within a shallow valley relative to the surrounding area.

Reflecting the surroundings the site has potential capacity for approximately 8 dwellings at 18 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the lack of access to services and facilities, the loss of Grade 4 agricultural land and the effects on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need. There is a potential effect on the landscape relating to the site being contained the related to the existing built environment.

Mitigation measures could include the use of screening to set a development into the landscape. Existing hedgerows should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 97 - Land opposite Stoven Row, Southwold Road, Stoven

Suggested Use: Not specified
Site Area: 0.60

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre and a sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Margaret is Grade II* listed and on the Heritage Register;
- Church Farmhouse to the east is Grade II listed;
- Cherry Tree Public House to the east is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Red’ impact (historic building and landscape).
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Site access can be gained off Southwold Road.

Foul sewerage improvements would be needed to accommodate development. A sewer pipe also traverses the site and there is a low risk of encroachment to the water recycling centre.

The land is greenfield. The site is set within an undulating rural landscape but is exposed to the south and west.

The site has potential capacity for approximately 5 new dwellings.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the landscape, lack of access to services and facilities and the effects on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the use of screening to set a development into the landscape. Existing hedgerows should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 144 – Junction of Station Road and Moll’s Lane, Brampton

Suggested Use: Housing
Site Area: 2.04

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling works and a pipe traverses the site.

Historic England stated there could be potential impact on the setting of a listed building:
• Manor Farmhouse to the east is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Nine members of the public objected to the proposed site citing the following reasons:
• being a dispersed settlement this type of development will have an adverse impact on the character of the area;
• the site is greenfield and would lead to the loss of agricultural land;
• development will be executive style housing which is inappropriate;
• poor provision of services and facilities in the area with no shop, no pub, a doctor’s surgery is difficult to access, public transport is poor and the train station is two miles away;
• the road network is poor with particular issues at the junction where visibility is particularly poor. Access to the school is dangerous for school children with no footway along narrow roads to access the bus stop and new development will add to this issue. It was suggested that a crossing should be provided over the A145 to improve access to the school;
• existing infrastructure requires improvement (sewerage, gas, water, telephone, drainage, broadband);
• subsidence is an issue in the area for existing buildings;
• there is no employment available in the local area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Site can be accessed off Moll’s Lane.

Foul sewerage improvements would be needed to support development. There is a low risk of encroachment on the water recycling centre and a sewer pipe crosses the site.

The land is greenfield. The site is exposed to the south and west however scattered dwellings are likely to reduce the impact of development.

The site has capacity for approximately 14 new dwellings at 7 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of access to services and facilities, the loss of Grade 3 agricultural land and the effects on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the use of screening to set a development into the landscape. Existing hedgerows and trees should be protected and enhanced where possible.
Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 157 - West of Redisham Road, Brampton

Suggested Use: Housing
Site Area: 3.12

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that 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 ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling works.

Historic England stated there could be potential impact on the setting of a listed building:
- Shingle Hall to the south west is Grade II listed.

The Environment Agency stated the site is classified as Source Protection Zone 3 (at risk of contamination from activities that may cause pollution in the area).

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Redisham Parish Meeting stated the increased traffic through Redisham could be considerable. The routes to local schools (Halesworth Road and Beccles Road) would need significant improvement. The site should only come forward if infrastructure is provided simultaneously. Currently there are issues with the sewerage system.

One member of the public objected to the proposed site citing the following reasons:
- the site is greenfield lane and would lead to the loss of agricultural land;
- poor provision of services and facilities in the area with no shop, no pub, a doctor’s surgery is difficult to access, public transport is poor and the train is two miles away;
- the road network is poor with particular issues at the junction where visibility is particularly poor. Access to the school is dangerous for school children as there is no footway along narrow roads to access the bus stop and new development will add to this issue. It was suggested that a crossing should be provided over the A145 to improve access to the school;
- existing infrastructure (sewerage, gas, water, telephone, drainage, broadband) requires improvement;
- there is no employment available in the local area.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated with the countryside with poor road access and no pedestrian access making the site unsuitable for development.

Foul sewerage improvements would be needed to support development and there is a low risk of encroachment on the water recycling centre. Electricity lines cross the site to the south.

The site is set within a farmed plateau surrounded by undulating farmland with fields enclosed by hedgerows. Development on this site would be separate form the nearby settlement.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

There is a risk of odour from the nearby water recycling centre.

The site is not considered suitable for development.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of access to services and facilities, loss of Grade 3 agricultural land and the effects on sustainable movement patterns.
Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the use of screening to set a development into the landscape. Existing hedgerows and trees should be protected and enhanced where possible. This site could be considered with site 19 to create a coordinated frontage.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 158 - Wood Cottage, London Road, Brampton

Suggested Use: Housing
Site Area: 0.29

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on a listed building:
- Manor Farmhouse to the south west is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green’ impact.

Suffolk Wildlife Trust stated the site is adjacent to Stoven Wood CWS and should not be allocated for development unless it can be demonstrated that it would not result in an adverse impact on the CWS.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Potential site access is from the A145.

There could be contamination from the former property found on site.

The land is greenfield and there is a pond on site. It is contained within the landscape and located adjacent to existing dwellings, however it does not reflect the settlement form.

There is biodiversity potential from both the pond and the adjacent woodland.

The site has a capacity for 4 new dwellings at 14 dwellings per hectare.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land and the impacts on sustainable movement patterns. There is a potential impact on biodiversity if the pond on site is lost to development.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to local services. There is a potential impact on the landscape.

Mitigation measures could include the design of the scheme to be set within the landscape and pedestrian access to connect the site with the built up area adjacent to the south.

Conclusion

The site has a capacity for less than five dwellings and has not been considered suitable for allocation as part of this allocation as part of this Local Plan.
Site 227 - Land on the south side of Southwold Road, Brampton

Suggested use: Housing  
Site Area: 3.0 hectares

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site comes from Southwold Road.

Foul sewerage improvements would be needed to support development and a sewer pipe crosses the site. Telephone cables traverse the site.
The land is greenfield. Site is flat but exposed to the south and east. Mature trees already integrate the existing buildings in the area.

The residential part of the site has potential capacity for 50 new dwellings at 25 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, the loss of Grade 3 agricultural land and the impact on sustainable movement patterns.

Minor positive effects were related to access to services and the provision of housing to meet a local need.

Mitigation measures could include sympathetic design to incorporate the area into the surrounding landscape and planting to counter some of the effects on biodiversity.

**Conclusion**

Site 227 could facilitate the delivery of a replacement village hall, equipped play area equivalent to a LEAP and a small playing field (which can also support amenity use). There is good access to the road network and a limited bus service. The allocation relates to the existing built up area but extends into the countryside. Landscaping would be required to mitigate this impact.

Suffolk County Council has expressed concerns related to car parking when parents drive their children to the primary school. There is potential for the site to provide parking spaces that could be shared between the school, village hall and the adjacent recreation facilities proposed as part of this allocation.

Site 227 has been allocated under Policy WLP7.11 of the First Draft Local Plan for further consultation to deliver open space and an equipped play area (with a minimum area of 0.80ha), a replacement village hall and associated parking spaces (to be shared with the school, no larger than 0.25ha) and housing (2ha). The residential part of the allocation has capacity for 50 dwellings (25 dwellings per hectare on the residential land or 17 dwellings per hectare across the entire site).
Corton

Site 114 - Land to the south of Church Lane, Corton

Suggested Use: Housing
Site Area: 4.45

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling works.

Historic England stated there could be potential impact on a listed building:
- Church of St Bartholomew to the north is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (high potential significance).
Suffolk County Council has said there are not enough primary school places available to support new development in the village.

Corton Parish Council stated the land is within 100m of the erosion area identified in the SMP. Improvements to utilities such as water mains are required.

The landowner, MJ Edwards & Partners stated that Corton has a good range of facilities including a shop, primary school, pubs and restaurants and the village and is well related to larger centres of Lowestoft, Gorleston and Great Yarmouth. There is good public transport to these areas. This indicates Corton to be a sustainable location. The site represents a logical extension of the existing built up area and is accessible off Church Lane. The site is not considered a significant encroachment on the Strategic Gap, could address the issue of ‘roll back’ for properties located in the erosion zone. The site is located in Flood Zone 1. The site is capable of accommodating 120 dwellings with additional open space with approximately 40 affordable dwellings (subject to viability).

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Site access can be gained off Church Road. There are no footpaths however the site is on a bus route.

Foul sewerage improvements would be needed to support development. There is also a high encroachment risk to the water recycling centre.

Small areas of surface water flooding to the south east. The site is also close to the coastal erosion risk zone.

The land is greenfield and located within the Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is enclosed on two sides however the northern and eastern edges are exposed.

A pond is located in the north east corner.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

Safety work may be needed along with provision of footpath and cycle paths. However the site is easily accessible.

The site has capacity for approximately 75 new dwellings at 19 dwellings per hectare.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land and climate change. A water recycling centre is located a short distance to the north west.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services, facilities and employment.

Mitigation measures could include the design of the scheme to be set within the landscape using screening and reflecting local character. Existing hedgerows should be protected and enhanced where possible.

Conclusion

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.
Gisleham

Site 110 - Land to the north of Black Street, Gisleham

Suggested Use: Housing
Site Area: 2.33

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network and a ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on a listed building:
- Rookery farm farmhouse to the west is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact.
Gisleham Parish Council objected to the allocation of the site for 70 dwellings. The Parish Council stated a development of this size would double the population adversely affecting the character of the village. Concerns were raised about the ability for existing infrastructure to cope with new development citing the narrow roads, no footways, surface water drainage issues, limit sewerage capacity and light pollution in an area that is of rural character. Additionally, there are no facilities in the village. The nearest school is located in Carlton Colville (and another in Kessingland) but there is no public transport (or footways to the nearest bus stop) therefore parents will drive their children to school creating more traffic problems.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated this would not result in an adverse impact on any existing ecological value it may have.

There were thirty five members of the public who commented on the site and all objected. The following issues were raised:

- over development will adversely affect the rural character and dynamics of the village and its location near the AONB. A few dwellings may be acceptable if in keeping with the existing settlement. Concerns were raised the development would be executive style dwellings that is not affordable for people with no connections with the community;
- the site is greenfield and would be a loss of agricultural land;
- development will adversely the environment and wildlife with the oak trees and sand pit providing important habitats;
- concerns were raised about the increase of traffic, the poor road network and access to the site, particularly if there is on-road parking. The lane is narrow and there are no footways or street lighting. This will increase school traffic to Carlton Colville Primary School which already has traffic problems;
- there are no services or facilities, public transport is poor and there is limited internet.
- the area experiences flooding and the site being located on a higher level relative to existing dwellings will make this worse;
- limited infrastructure and there are already existing issues with sewerage, power outages are a common occurrence and there are no gas mains;
- existing residents suffer from shadow flicker associated with the Kessingland wind turbines;
- concerns were raised regarding the adverse impact on visual amenity, loss of privacy and views over the countryside and the lowering of property values.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed along Black Street, however there are no footpaths.

Foul sewerage improvements would be needed to support development and a sewer pipe crosses the site. Power cables also traverse the site.
The land is greenfield and is located within a Tributary Valley Farmland a landscape character area. Front of the site is contained but the rear backs out onto open farmland. There will be some impacts on views from the north and west but these will not be significant.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site has potential capacity for approximately 19 new dwellings at 8 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative effect was associated with the loss of Grade 2 agricultural land. Minor negative effects were associated the lack of access to services and facilities, the impact on the landscape, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape using screening and reflecting local character. Existing hedgerows and trees should be protected and enhanced where possible. Access to Kessingland should also be improved.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Herringfleet

Site 91 - Land on the junction of St Olaves Road / Sluggs Lane, Herringfleet

Suggested Use: Housing
Site Area: 0.80

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority stated the site lies within their administrative area.

Historic England stated there could be potential impact on the setting of a listed building:
- Manor House Farmhouse, barn and garden walls are Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Red’ impact (historic building and landscape).

Ashby, Herringfleet and Somerleyton Parish Council stated the site was located within the Broads Authority administrative area. Some development could be considered here in the future but not at the density indicated.

Wellington Construction Limited stated the site is currently used as paddocks and is close to services and facilities in Somerleyton. To meet the housing need to 2036 some greenfield development will be required. The site is viable and can contribute towards the five year supply and the housing strategy.

Members of the public objected to the site raising concerns about access, the site being too isolated from the village and it is an inappropriate location for development.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access to the site comes from Slugs Lane.

The foul sewer network would require improvements to accommodate development. Telephone cables also traverse the site.

The site is made up of settled farmland and is contained by several residential dwellings to the north. It is however exposed to the south.

The site lies opposite a listed building.

The site was withdrawn.

**Summary of Draft Sustainability Appraisal**

A significant effect was noted in relation to the use of Grade 2 agricultural land. Minor negative effects include the effects on health and well-being, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects include access to local services and the provision of housing to meet local needs. A potential effect could be on the landscape.

Mitigation measures include improving connectivity to Lowestoft and planting and screening.
Conclusion

The site is located within the Broads Executive area and has not been considered as an allocation.
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Hulver with Henstead Parish Council stated the number of dwellings proposed on the site was unsuitable.
Two members of the public objected to the site. It was commented the proposal would lead to significant over development of the settlement which has no services, facilities, issues with drainage and no public transport. The development would have an adverse impact on the rural character of the settlement. It was added that the site was located in the AONB and development would result in the loss of agricultural land.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Hulver Road.

The water recycling centre requires improvements as does the foul sewer network. This would require substantial off-site infrastructure which may not be economically viable.

There are areas of high surface water flood risk.

The site is located within the Area of Outstanding Natural Beauty and is greenfield land. The site is mostly enclosed with some obscured views to the north.

The site has capacity for approximately 10 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects are associated with the impact on the landscape, lack of services and facilities, flood risk, the loss of undeveloped land, the impact on biodiversity and the impacts on sustainable movement patterns. There is a potential impact on water quality relating to the improvements needed at the local water recycling centre.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 71 - Land north of Hulver Street, Henstead

Suggested Use: Housing
Site Area: 3.86

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council stated the site was some distance from services and facilities and would encourage unsustainable travel choices.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact (possibly ‘Red’ on topographic sensitivity).

Hulver with Henstead Parish Council stated the number of dwellings proposed on the site was unsuitable.
The Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

Two members of the public objected to the site. It was commented the proposal would lead to significant over development of the settlement which has no services, facilities, issues with drainage and no public transport. The development would have an adverse impact on the rural character of the settlement. It was added that the site was located in the AONB and development would result in the loss of agricultural land.

It was suggested the site could be used for community use to support the village.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site is located within the AONB. The site is open and extends into open countryside. Any development on this site is likely to have an impact on the character of the AONB which would be difficult to mitigate. Therefore this site is considered to be unsuitable for development.

Foul sewerage improvements would be needed to support development. This would require substantial off-site infrastructure which may not be economically viable.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects are associated with the impact on the landscape, lack of services and facilities, the impact on biodiversity and the impact on sustainable movement patterns. There is a potential effect on water quality associated with the improvements needed at the local water recycling centre.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 130 - Old Rectory Poultry Unit, Benacre Road, Hulver Street, Henstead

Suggested Use: Housing
Site Area: 1.87

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Historic England stated there could be potential impact on the setting of a listed building:
- The Old Rectory to the east is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Hulver Street with Henstead Parish Council stated the number of dwellings proposed on the site was unsuitable.
Members of the public commented that the site is well located with respect to other features in the village including good access. It was also stated the proposal would lead to significant over development of the settlement which has no services, facilities or public transport and that the development would have an adverse impact on the rural character of the settlement.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is located on the edge of the AONB and sits in undulating farmland. Hedges and trees are located on site. The area is enclosed farmland and development would be a major encroachment into the sensitive landscape. There this site is considered to be unsuitable for development.

The site can be access from Hulver Road but access is poor for cars and is only accessible to farm vehicles.

The foul sewerage network would require improvements to accommodate development. This would require substantial off-site infrastructure that may not be economically viable. Electricity lines also cross the site.

There is potential for biodiversity in the hedges and trees bordering the site. The northern edge is also overgrown, potentially adding to the site biodiversity value.

The site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of services and facilities, the loss of greenfield land and the impacts on sustainable movement patterns. There are potential impacts on water quality and the historic environment.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 191 - The Geranium Pot, Mariawood, Hulver Street, Hulver

Suggested Use: Housing
Site Area: 0.88

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Hulver Road, however, the road access is up a steep bank and visibility could be an issue.

There are power lines adjacent to the site.

There is potential contamination from the various outbuildings located on site.
The land is greenfield and is located with a Tributary Valley Farmland landscape area. It is exposed to the countryside but consistent with the current settlement pattern.

There are potential impacts on local listed buildings.

The site has potential capacity for approximately 7 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of services and facilities, the loss of greenfield land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Ilketshall St Lawrence

Site 192 - Opposite Osborne House Barn, Ilketshall St Lawrence

Suggested Use: Housing
Site Area: 0.38

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from the A144. There is no paved footway however there is a wide grass verge.

The land is greenfield made up of fallow land. Dwellings are adjacent to the north and west and at a distance to the south.
The site has capacity for approximately 6 new dwelling at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was noted in relation to the impact on the landscape due to the sites isolated nature. Minor negative effects were associated with the access to services, loss of Grade 3 agricultural land, impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located along the A144 and has good access to the transport network between Halesworth and Bungay. A limited bus service is available several hundred metres to the south. A primary school is located at Stone Street to the south, however, no formal footways connect the settlement with the facilities in the vicinity. The site within 400m of a water recycling works. There are no significant issues related to infrastructure or landscape, however, the site does not relate well to other villages in the area and development would be out of keeping with the character of the rural landscape. The site is considered to be less preferable in terms of a sustainable location compared to other sites closer the settlement of Stone Street. The site is not considered suitable for allocation as part of this Local Plan.
Site 193 - School Farm, Ilketshall St Lawrence

Suggested Use: Housing
Site Area: 2.39

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site is gained from the A144.

The land is greenfield. It is a long tract between two parts of the settlement and is connected to the main part of the settlement to the south.

New residents could support local school and pub.
The site has capacity for approximately 36 new dwellings at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was noted in relation the impact on the landscape due to the sites isolated nature. Minor negative effects were associated with poor access to services, the loss of Grade 3 agricultural land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located along the A144 and has good access to the transport network between Halesworth and Bungay. A limited bus service is available several hundred metres to the south. A primary school is located at Stone Street to the south, however, no formal footways connect the settlement with the facilities in the vicinity making it a less than sustainable location. The site is within 400m of a water recycling works. There are no significant issues related to infrastructure or landscape, however, the site does not relate well to other villages in the area and development would be out of keeping with the character of the rural landscape. The site is considered to be less preferable in terms of a sustainable location compared to other sites closer to the settlement of Stone Street. The site is not considered suitable for allocation as part of this Local Plan.
Site 216 – Land south of Hogg Lane, Ilketshall St Lawrence

Suggested Use: Housing
Site Area: 2.56

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site has been explored in addition to the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site can be accessed from School View and the A144.

The land is greenfield, located within an area designated as Source Protection Zone 3 and is located in an area of low landscape sensitivity. The site is located close to the primary school and a public house is located to the south.

Access to the A144 allows facilities to be accessed by private vehicle with Halesworth and Bungay being the primary service centres. A limited bus service is available. Footways will need to be extended to the site to provide safe access to the school.
The site has capacity for approximately 25 dwellings (10 dwellings per hectare reflecting the housing density and character of the nearby residential area).

**Summary of Draft Sustainability Appraisal**

Minor positive effects were identified in relation to the provision of housing that can provide a mix of types and tenures. The site is located in an area with low landscape sensitivity and which suggests a high capacity to support new development, however, there is potential to create an exposed settlement edge.

There is limited potential for archaeology on site but a planning condition should be part of any planning permission for development on this site.

The land is greenfield and classified as Grade 3 agricultural land. The site is small therefore this is considered to be a minor negative effect.

Mitigation measures could include a scheme design and the use of hedgerow and trees to integrate the development into the countryside where it is exposed to the south and east. There are no play facilities in the village and an equipped play space equivalent to a LEAP would improve facilities for children in the settlement.

**Conclusion**

The site forms an extension to the built up area and is located near the main part of the settlement where facilities are located. There is a bus stop nearby to provide access to larger service centres and there is good access to the strategic road network. The area has a low landscape sensitivity, however, there is potential to create an exposed settlement edge on the south and east boundary of the site and landscaping and planting should be used to mitigate this. There are no equipped play facilities in the village and this development could facilitate this to support new residents and enhance the provision of facilities for the village overall. The land is adjacent areas that are used for agriculture and access to the farm buildings to the south will need to be retained.

This site has been allocated under Policy WLP7.13 of the First Draft Local Plan.
Ilketshall St Margaret

Site 139 - Shoe Devil Lane, Ilketshall St Margaret

Suggested Use: Housing
Site Area: 1.82

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Margaret to the south west is Grade I listed;
- Church Farmhouse, Ropers Farmhouse, Shoe Dell Farmhouse (and barn) and School Farmhouse all located in the village are Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Ilketshall St Margaret Parish Meeting objected to the site because there is a lack of infrastructure including electricity, water and broadband. The narrow lane required to access the site would require improvements to support additional traffic.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed off Shoe Devil Lane, however, this is a narrow lane with the width of a single vehicle with no cycle lanes or pavements.

There is a pumping station opposite Shoe Devil Lane.

Parts of the site are at risk of surface water flooding.

The land is greenfield. The site is located within the AONB and in a Tributary Valley Farmland landscape character area. Hedgerows and ditches are located on site.

The site has capacity for approximately 5 new dwellings.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of services and facilities, the loss of Grade 3 agricultural land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Kessingland

Site 41 - Land at London Road, Kessingland (former Ashley Nurseries site)

Suggested Use: Housing
Site Area: 1.42

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.
Badger Building stated the site could be brought forward in the early part of the plan period and is not reliant on other sites coming forward. The site is well located in relation to existing development. It was suggested that site 41 is allocated in the Neighbourhood Plan for mixed use but the site is not large enough to accommodate the scale of development proposed.

Two members of the public cited the following issues:
- the site is greenfield and located in the Strategic Gap;
- existing drainage issues on site;
- issues such as traffic, parking, traffic speed would need to be addressed to support existing and new development.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts that could not be mitigated. Foul sewerage improvements would be needed to support development.

The land is brownfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is located in the Coastal Cliffs character area.

The site has been allocated for 54 dwellings at 38 dwellings per hectare in the Kessingland Neighbourhood Plan.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. A potential negative effect was identified in relation to the impact on a listed building.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, good access to services and facilities and use of brownfield land.

Mitigation measures identified in the appraisal included sympathetic design to accommodate the location of the listed building and landscaping. Connectivity should also be improved to Lowestoft.

Conclusion

The site has access to a variety of community facilities and has good access to the road network. This is supplemented by a good bus service to Lowestoft. A Grade II listed building is located opposite and there is limited potential for archaeology to be found on site which should be addressed through a planning condition requiring an archaeological assessment. The site is brownfield, is well related to the built up area
and is a natural extension to the village, however, it is located within the Strategic Gap. Impact on the landscape is low, however, consideration will need to be given to how this contributes towards the coalescence with Lowestoft. The site is brownfield land. This site has not been carried forward as an allocation as it has already been allocated in the adopted Kessingland Neighbourhood Plan for residential development.
Site 85 - Land off Rider Haggard Lane, Kessingland

Suggested Use: Housing
Site Area: 2.66

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

Kessingland Parish Council stated that none of the landowners came forward when the Kessingland Parish Plan was being prepared. The Neighbourhood Plan has allocated land for 100 homes and this site should be considered surplus to requirements.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.
Wellington Construction Limited stated the site is close to services and facilities in the village and reiterated that approximately 60 dwellings could be provided on the site as stated in the consultation document. A lower density development could be considered with some affordable dwellings and starter homes. The site is in a sustainable location near services and facilities in the village. To mitigate impact on the surrounding area and Strategic Gap there is sufficient space to support strategic planting. Impact on the Strategic Gap would be less than the Laurel Farm site proposed in the Kessingland Neighbourhood Plan. The loss of woodland considered as part of the Sustainability Appraisal could be offset by landscaping and planting. It was noted that some greenfield sites such as this will be needed to accommodate the development needed during the plan period and the site could contribute towards the five year housing supply and housing strategy.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site is accessed either through amenity land or via a private car parking court.

Foul sewer improvements would be needed to support development. A sewer pipe also traverse the site.

The site is 75 metres from the coastal change management area.

The land is greenfield and there are Tree Preservation Orders on the site. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is enclosed in the landscape, however development would encroach on the undeveloped coast between Pakefield and Kessingland.

Access to the site would result in the loss of many mature trees unless Kipling Close can be used.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site could accommodate approximately 80 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, the use of greenfield land and habitats.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and good access to services and facilities. There is a potential impact on sustainable movement patterns.
Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible. Improvements are required for pedestrian and cycling connectivity to Lowestoft.

Conclusion

The adopted Kessingland Neighbourhood Plan contains housing allocations to be delivered during the plan period. Therefore, this site has not been carried forward as an allocation in this Local Plan.
Site 109 - Land to the North of 109 London Road, Kessingland

Suggested Use: Housing
Site Area: 0.36

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of a listed building:

- Pond Farmhouse to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green’ impact.

Kessingland Parish Council stated that none of the landowners came forward when the Kessingland Parish Pan was being prepared. The Neighbourhood Plan has allocated land for 100 homes and therefore this site should be considered surplus to requirements.
Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

Two members of the public responded and raised concerns the site was put forward for development. Issues raised included:

- adverse impact on Pond Cottage, a listed building;
- the land is greenfield, forms part of the Strategic Gap and there would be an adverse impact on wildlife;
- there would be a loss of views and privacy;
- no affordable dwellings would be provided in the development which are required in the village;
- the site is not part of the Neighbourhood Plan that has been prepared.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. A sewer pipe also traverses the site. The local wastewater recycling centre does require improvement.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is enclosed within the field boundaries.

The site is adjacent to a Grade II listed building.

The site has potential capacity for 14 new dwellings at 40 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Minor negative effects were associated with the loss of Grade 2 agricultural land and the impact on a listed building. There are potential impacts on the landscape and biodiversity.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and good access to services and facilities. There is a potential effect on sustainable movement patterns as well.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible. Improved pedestrian and cycling connectivity to Lowestoft is required.
Conclusion

The adopted Kessingland Neighbourhood Plan contains housing allocations to be delivered during the plan period. Therefore, this site has not been carried forward as an allocation in this Local Plan.
Site 119 - Land to the west of St Edmunds Church, Kessingland

Suggested Use: Housing
Site Area: 0.28

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site could impact on the setting of a listed building:
  • Church of St Edmund adjacent is Grade I listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (historic building and landscape).

Kessingland Parish Council stated the landowner did not wish their land to be considered as part of the Neighbourhood Plan area when the Neighbourhood Plan was being prepared. The site is within the AONB.
bordering the Kessingland Levels and in part is used as allotments. The Neighbourhood Plan has allocated land for 100 homes and this site should be considered surplus to requirements.

Suffolk Wildlife Trust stated the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

One member of the public objected and raised concern this would result in the unnecessary loss of greenfield land when the Ashley nursery site was available.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints or impacts that could not be mitigated. The site can be accessed from Church Road, however there are no footpaths.

Telephone cables cross north west corner of site.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the valley to the south. Development could impact on the setting of St Edmunds Church but is otherwise enclosed.

The site is overgrown and could provide habitats for local wildlife.

There is potential for archaeological finds on the site and a programme of archaeological work will be required through a planning condition. The site is adjacent to St Edmunds Church which is Grade 1 listed.

The site has capacity for approximately 8 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the impact on a listed building. Minor negative impacts were associated with the loss of Grade 3 agricultural land and biodiversity.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, good access to services and facilities and promoting sustainable movement patterns. There is a potential effect on the landscape relating to development improving the appearance of this overgrown site.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible. Improved pedestrian and cycling connectivity to Lowestoft is required.
Conclusion

The adopted Kessingland Neighbourhood Plan contains housing allocations to be delivered during the plan period. Therefore, this site has not been carried forward as an allocation in this Local Plan.
Site 125 - Manor Farm Barns, Church Road, Kessingland

Suggested Use: Housing
Site Area: 0.66

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site could impact on the setting of a listed building:
- Church of St Edmund adjacent is Grade I listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact.

Kessingland Parish Council stated the landowner did not wish their land to be considered as part of the Neighbourhood Plan area when the Neighbourhood Plan was being prepared. The site is within the AONB bordering the Kessingland Levels and in part is used as allotments. The Neighbourhood Plan has allocated land for 100 homes and this site should be considered surplus to requirements.
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Church Road which has no footpaths.

Four sewerage improvements would be needed to support development.

There is the potential for contamination from oil tanks located on site.

The site is part brownfield and part greenfield and located within a Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the valley to the south.

There is potential for archaeological finds on the site and a programme of archaeological work will be required through a planning condition. St Edmunds Church is located adjacent which is Grade I listed.

The site has capacity for approximately 13 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

A significant negative impact was associated with the potential impact on a Grade 1 listed building. Minor negative impacts were associated with the impact on the landscape.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, good access to services and facilities, use of brownfield land and promoting sustainable movement patterns.

Mitigation measures could include the design of the scheme reflect the value of the church. Existing hedgerows and trees should be protected and enhanced where possible. Improvements are needed for pedestrian and cycling connectivity to Lowestoft.

Conclusion

The adopted Kessingland Neighbourhood Plan contains housing allocations to be delivered during the plan period. Therefore, this site has not been carried forward as an allocation in this Local Plan.
Lound

Site 75 - Land North of Snakes Lane, The Street, Lound

Suggested Use: Housing
Site Area: 0.41

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building:
- Mardle House to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Lound Parish Council objected to the site and the number of dwellings proposed. The site (in conjunction with site 167) would double the size of the village. Development in the village should be small in scale and be in keeping with the character of the settlement. Concerns raised at a Parish meeting which was attended by the public included adverse impact on the character of the village, damage to the environment and wildlife, increased flooding and remove the opportunity to extend the church yard in the future.

The landowner, Somerleyton Estate stated the site is suitable, available, achievable and viable. There are a number of local services and facilities (public house, meeting place, café and bakery) available which contribute towards its sustainability including the connections with nearby villages and settlements. The housing that could be delivered on the site could be a mix of types and tenures to meet local housing need including affordable dwellings and smaller homes for first time buyers. At 30 dwellings per hectare the site could accommodate a maximum 12 dwellings of which 4 of these could be affordable units. The submission does not agree the site is classified as Grade 1 agricultural land as it has not been farmed since at least 1999 and the Sustainability Appraisal should be amended to reflect this.

One member of the public commented the site is of a more appropriate scale for the size of the village [compared to site 167] and could be used for affordable housing or shared ownership but 12 dwellings could still be too many for the site.

Twenty people objected to the site raising concerns which included:
- proposed site is in a prominent location in the village and it would have an adverse impact on the quality of life within the village and its rural character;
- new development would spoil the views of the village when approaching from Snake’s Lane;
- impact on the landscape, wildlife, visual amenity and it would have an adverse impact on the rural character of the village;
- infill development is more appropriate;
- green field site, loss of agricultural land and impact on the bridleway would have adverse impact on wildlife;
- the site is located outside of the village envelope;
- the road is narrow, visibility poor and some traffic passes through the village above the 30mph speed limit which is exacerbated by on-road parking;
- improvements will be required to the existing infrastructure network (sewerage, roads, parking);
- the village has no amenities (school, shop, doctor’s surgery), has limited public transport, no local employment and access to schools will be required;
- the site is prone to flooding and poor drainage in the area is an ongoing issue.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development.
There are small areas of medium and high surface water flood risk.

The land is greenfield and is located within a Tributary Valley Farmland landscape character area. The site is mostly enclosed but open to the west.

The site has capacity for approximately 8 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of Grade 1 agricultural land. Minor negatives effects were identified on the landscape, climate change and biodiversity. There is a potential impact on the historic environment.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the setting of the listed building. A Heritage Appraisal would need to accompany any future planning application. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site lies on the northern fringe of the settlement and would result in the loss of Grade 1 agricultural land. There is potential for archaeology to be found on the site. North of the site is Mardle House which is listed. The building faces south and is separated from the main village which contributes to the character of the building and the village. There is potential for this character to be adversely affected. This site is not considered suitable for allocation as part of this Local Plan.
Site 167 - Land north of Church Lane, Lound

Suggested Use: Housing
Site Area: 6.86

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A pipe traverses the site.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St John Margaret adjacent to the site is Grade II listed;
- Mardle House nearby is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (high potential significance).

Lound Parish Council objected to the site and the number of dwellings proposed. The site (in conjunction with site 75) would double the size of the Lound. Development in the village should be small in scale and
be in keeping with the character of settlement. Concerns raised at a Parish meeting which was attended by the public included damage to the environment and wildlife, increased flooding, have an adverse impact on the village character and remove the opportunity to extend the church yard in the future.

Thirty three members of the public objected to this site based on the following issues:

- proposed scale of development is not in keeping with size the village as it would double its size and have an adverse impact on the quality of life within the village and its rural character;
- combined with the growth proposed in Blundeston this could result in the villages become merged;
- impact on the landscape, wildlife, visual amenity, additional light/noise pollution and it would have an adverse impact on the rural character of the village. It was added the four villages of Ashby, Herringfleet, Somerleyton and Lound should remain unspoilt villages for residents and visitors;
- infill development and use of brownfield land is more appropriate;
- green field site, loss of agricultural land and development would have adverse impact on wildlife;
- a footpath traverses the site and this is well used by walkers;
- Blacksmith’s Loke is an unadopted bridleway and is too narrow for additional traffic, Church Road will need to be improved for safety;
- some traffic passes through the village above the 30mph speed limit and this is exacerbated by on-road parking;
- improvements will be required to the existing infrastructure network (sewerage, electricity, roads, parking);
- the village has no amenities (school, shop, doctor’s surgery), has limited public transport, no local employment and access to schools will be required;
- lowland area which is known to flood as evident after the building of the houses opposite the Village Maid public house and existing properties are prone to subsistence;
- surface water drains traverse the site east to west and development would impact on the flow of water;
- the potential to extend the churchyard in the future would be lost.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site is accessible from Church Lane.

Foul sewerage improvements would be needed to support development and a sewer pipe crosses the site.

The land is greenfield and within a Tributary Valley Farmland landscape character area. The site is flat and well contained. The scale of the site would result in a significant expansion of Lound and could change the character of village.
There is potential for archaeological finds on site. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork. There is also a potential impact on a Grade II listed building.

Development on this site would likely impact upon country roads.

The site has capacity to support approximately 103 new dwellings at 15 dwellings per hectare.

Summary of Draft Sustainability Appraisal

Significant negative impacts were associated with the impact on the landscape, the loss of Grade 1 agricultural land and the impact on a listed building. Minor negative effects are associated with the impacts on sustainable movement patterns. There are potential impacts on access to services as well.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the setting of the church. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

This is a large site development of this scale would be out of character for the village. There is access to amenity green space, a public house and the village hall, however there are no footways connecting to the site. There is no public transport to provide sustainable transport to Lowestoft and Great Yarmouth to support a development of this scale. The scale of the site would result in the loss of a significant amount of Grade 1 agricultural land compared to other sites in the area. Development could potentially have a significant adverse impact on the setting of the church. The site would also create a significant extension into the open countryside adversely affecting the character of the area. This site is not considered suitable for allocation as part of this Local Plan.

Site 194 - Between The Street and The Village Green, Lound

Suggested Use: Housing
Site Area: 0.45
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from The Street via a farm.

The land is greenfield and is located within a Tributary Valley Farmland landscape character area. There is low density development to the north, terraced housing to the west and open space to the south.

A historical church is located to the east. Development could have an impact on this building.

The site has capacity for approximately 10 new dwellings at 22 dwellings per hectare.

Summary of Draft Sustainability Appraisal
A significant negative impact was associated with the loss of Grade 1 agricultural land. Minor negative effects were associated with the impacts on sustainable movement patterns. There is also a potential impact on a Grade II listed building.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to reflect the character of the area and the setting of the church. Access should be provided to the Public Right of Way north of the site.

**Conclusion**

This is a small site located adjacent to residential development and the Millennium Green within the built up area of Lound. The site is contained within the wider landscape by existing development. There is access to facilities in the village although the footway network is limited. The scale of the scheme is in keeping with the character of the village whilst being large enough to provide a mix of housing tenures to meet housing needs. There is potential for development to impact on the setting of St Margaret’s Church which is Grade II listed and a heritage asset appraisal would be required to identify how potential adverse impacts could be mitigated. To fit in with local character and mitigate potential impact on the listed building a scheme should be considered that consists of small cottages and has been designed to protect the outlook for the adjacent property north of the site and enhance the setting of Millennium Green located to the south.

This site has been allocated under Policy WLP7.14 of the First Draft Local Plan for 10 dwellings (22 dwellings per hectare).
Site 195 - Lound Campus, Church Lane, Lound

Suggested Use: Housing
Site Area: 6.88

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this site could have a serious impact on a Grade II listed building. Much of the site is also covered by a historic environment record.

Developing this site would also lead to a loss of playing fields, making this site unsuitable for development.

There is no pedestrian access to the site from the village.

Telephone lines traverse the site.
Existing buildings on the site could be a source of contamination.

The land is a mix of greenfield and brownfield with existing buildings on site. Part of the site is located within a Tributary Valley Farmland landscape character area, the rest is settled farmland. There are tree preservation orders on site.

The site is isolated from the rest of the village.

The site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

Significant negative impacts were associated with the loss existing playing fields and of Grade 1 agricultural land. Minor negative effects were associated with access to services, impacts on the landscape, and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible. It could also be suggested that only the Brownfield areas within the site should be developed to avoid losing any Greenfield areas.

Conclusion

Redevelopment would have an adverse impact on the rural nature of the area in the open countryside. This would likely create an exposed settlement edge having an adverse impact on the landscape. The scale of development is not in keeping with the character of the village and would result in the loss of a significant amount of high quality agricultural land and existing playing fields. The site is isolated from the village and there are no footways connecting people to local services and facilities contributing towards an unsustainable location. The site has been formerly used as a school and there are existing buildings on site. Whilst this has created a built up area in the countryside the same issue discussed above still apply and development is considered unsuitable. This site is not considered suitable for allocation as part of this Local Plan.
Mutford

Site 88 - Land on Hulver Road, Mutford

Suggested Use: Housing
Site Area: 4.93

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that 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 ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building:

- Kiers Cottage is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Mutford Parish Council said the site is unsuitable for development as it is greenfield land and would extend the curtilage of the village.

Wellington Construction Limited stated the site will provide market, affordable and starter homes. The site is greenfield land but this is a characteristic of a majority of sites put forward and is inevitable given the housing needs of the District during the plan period. There is significant potential to mitigate potential impact on the surrounding countryside using hedgerows and strategic planting. The site offers up to 140 dwellings and could be part of a new settlement as suggested in option 4 of the growth strategies. Given the limitations of sites available to meet housing demand there is greater need to promote sites that are available viable and deliverable in accordance with paragraph 47 of the NPPF. There should be no viability issues with this site and it could be brought forward early in the plan period and contribute towards the five year housing supply and housing strategy.

One member of the public objected to the site commenting that such a development would adversely affect the rural character of the area and occupants would be reliant on private vehicles to access services and facilities.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The land is greenfield, located in a Tributary Valley Farmland landscape character area and is on the edge of the AONB. The site is flat and heavily exposed with no landscape features. The impact on the AONB would be difficult to mitigate.

The site can be accessed from Hulver Road.

Foul sewerage improvements would be needed to support development.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

The site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land, landscape, lack of access to services and facilities, the impacts on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.
Conclusion

The site could provide a mix of housing tenures to meet housing need, however, the site is not well related to the existing built up area and development would extend the village into the open countryside. This could have an adverse impact on the landscape and character of the village. Mutford is accessed by a narrow road network and there are no services or facilities in the village itself, however, these can be accessed in South Lowestoft and Beccles. With no transport available private vehicles would be required and a scheme design should account for this. There is limited scope for development in this area and any development that does take place should be brought forward that relates to the existing built up area. For this reason the site is not considered appropriate. This site is not considered suitable for allocation as part of this Local Plan.
Site 131 - Orchard Farm Rear Field, New Road, Mutford

Suggested Use: Housing
Site Area: 2.11

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building:
- Ash Farmhouse to the east is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Mutford Parish Council said the site is unsuitable for development as it is greenfield land and would extend the curtilage of the village.
Two members of the public objected to the proposed site citing the following reasons:

- the site is greenfield, is located outside of the village envelope, extends into the open countryside and is not a location that would meet local housing demand;
- the development is too large and would adversely affect the rural character of the village including increased noise and sound pollution;
- there are few services and facilities available;
- the lane is narrow and there is difficulty joining the A146 while New Road is well used by cyclists, pedestrians and horse riders;
- it would set an unacceptable precedent.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The site can be accessed from New Road, however, there are no footways providing access to the village. The site is located along a signed cycle route but this is not supported by any infrastructure. The access constraints mean that the site is not considered to be suitable for development.

Foul sewerage improvements would be needed to support development. Power lines also cross the site.

The land is greenfield. Part of the site is within a Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a high capacity to support development. The site is flat and exposed to the wider countryside. The site also has a poor relationship with the village. Site 132 would need to be developed as well to make this site viable.

There is no facilities for cyclists or pedestrians.

The site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

A significant negative impact was associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the landscape, biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows should be protected and enhanced where possible. Site should be considered in conjunction with site 132.
Conclusion

The site is not well related to the existing village and is isolated in the open countryside. Development of this site would have a negative effect on the quality of the landscape by reducing the rural character and increase the sense of human influence in the area by creating a built up area with prominent settlement edges in the open countryside. Development on this site would result in the loss of Grade 2 agricultural land when other sites are available categorised as Grade 3. There is limited access to services and facilities in the area and access to the village is not supported with any infrastructure such as pavements. Overall, the location of the site and its availability do not outweigh the negative aspects of the site in comparison for others. This site is not considered suitable to be carried forward as a preferred option in this Local Plan.
Site 212 – Land south of Chapel Road, Mutford

Suggested Use: Housing
Site Area: 0.62ha

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted following the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Chapel Road.

The land is greenfield and is located in an area classified as Tributary River Valley Farmland. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a moderate value and a high capacity for new development. The site well contained but landscaping may be required.

The site could have an impact on the setting of a listed church if it is developed.
The site has capacity for approximately 8 new dwellings at 13 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant negative effect was noted in relation to the loss of Grade II agricultural land. Minor negative effects were identified in relation to access to services and facilities, the impact on the landscape, impact on the historic landscape and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing to help meet local needs.

Mitigation measures could include a scheme design and reinforcing the hedgerow and trees to protect the setting of the listed building. The footway along Chapel Road should be extended to the site to improve pedestrian access to the village centre.

**Conclusion**

The site is contained within the landscape and where sensitivity to new development is low. Facilities within the village include a village hall, playing field and equipped play area with retail, employment and education facilities located a couple miles away in South Lowestoft and Kessingland. To mitigate potential impact on the site and improve access to facilities the footway along Chapel Road should be extended to the site and an archaeological condition should be applied to any planning permission. The site is well related to the existing built up area with dwellings to the north and a listed building (church) to the south. With the low impact on the wider landscape this site has potential to be brought forward.

This site has been allocated under Policy WLP7.15 of the First Draft Local Plan for 8 dwellings.
Site 213 – Land north of Chapel Road, Mutford

Suggested Use: Housing
Site Area: 0.46

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted following the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Chapel Road.

The land is greenfield and is located in an area classified as Tributary River Valley Farmland. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a low sensitivity, a moderate value and a high capacity for development. Landscaping will be needed to the rear of the site.

The site has capacity for approximately 6 new dwellings at 13 dwellings per hectare.
Summary of Draft Sustainability Appraisal

A significant negative effect was noted in relation to the loss of Grade 2 agricultural land. Minor negative effects were related to access to services and facilities and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing and the impact on the landscape.

Mitigation measures could include screening along the northern boundary of the site so not to create an exposed settlement edge. The built character of this area is best reflected by a scheme design of six semi-detached dwellings and reflect the dwelling size to plot ratio of the existing dwellings located west of the site.

Conclusion

The site is contained within the landscape and the built up area where sensitivity to new development is low. Facilities within the village include a village hall, playing field and equipped play area with retail, employment and education facilities located a couple miles away in South Lowestoft and Kessingland. To mitigate potential impact on the character of the area a scheme should come forward that consists of six semi-detached dwellings of a proportion that is consistent with the existing dwellings located west of the site. The dwelling footprints should be consistent with these to retain the character of the area.

This site has been allocated Policy WLP7.16 of the First Draft Local Plan for 6 dwellings.
Redisham

Site 19 - Halesworth Road, Redisham

Suggested Use: Housing
Site Area: 0.21

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre.

Historic England stated there could be potential impact on the setting of a listed building:
  • Church of St Peter to the north is Grade I listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Redisham Parish Meeting suggested there is potential to build on the site but six dwellings is too many on a small plot of land. Halesworth Road adjacent the site floods regularly and drainage works would be required.

The Suffolk Wildlife Trust suggested the site could potentially contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. There is a low encroachment risk to the water recycling centre.

The land is greenfield. The site is very exposed and could have a negative impact on the landscape, including views to the village and listed church to the south.

There is a potential impact upon the setting of the Grade I listed church of St. Peter.

The site has capacity for approximately 5 new dwellings.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the impact on a Grade I listed building. Minor negative effects are associated with the impact on the landscape, the impact on health and well-being, the loss of Grade 3 agricultural land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape and protect the setting of the listed building. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Ringsfield and Weston

Site 10 - Cromwell Road, Weston

Suggested Use: Housing
Site Area: 1.16

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that 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 ‘Red’ impact on their assets. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (historic landscape).
Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site can be accessed from Cromwell Road but there is poor visibility. There are no footways or quality cycle routes to Beccles to connect people with services and facilities, making the site unsuitable for development.

Foul sewerage improvements would be needed to support development. This would require substantial off-site infrastructure which may not be economically viable.

The Settlement Fringe Landscape Sensitivity Study identifies this character area as having a moderate sensitivity, a moderate value and a moderate capacity for development. The north is well screened however the south is more exposed. The site is also remote from the main part of Ringsfield.

There are historic field patterns within an enclosed landscape. A programme of archaeological work will be required secured through a planning application.

The site is not considered to be suitable for development.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with access to services, the impact on the landscape and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 11 - Cromwell Road opposite 1 Rose Villa, Ringsfield

Suggested Use: Housing
Site Area: 2.23

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (historic landscape).

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site can be accessed from Cromwell Road but there is poor visibility. There are no footways or quality cycles to Beccles to connect people with services and facilities, meaning this site would be unsuitable for development.
The nearby water recycling centre needs more capacity and the foul sewerage network requires improvements. This would require substantial off-site infrastructure which may not be economically viable. Overhead lines also cross the site.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for development. The site is flat and can be seen from a public right of way.

This site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

Significant negative effects are associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the landscape, access to services and impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 196 - School Road, Ringsfield

Suggested Use: Housing
Site Area: 2.56

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from School Road.

The land is greenfield and exposed to the north which would require landscaping. Mature trees help integrate the existing built environment into the surrounding landscape.

Hedges and trees can be found on the edge of the site.
The site has capacity for approximately 40 new dwellings at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land and the impacts on sustainable movement patterns. There is a potential impact on biodiversity relating to the adjacent woodland.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening, particularly along the northern boundary which connects with the existing wooded area adjacent. Existing hedgerows should be protected and enhanced where possible. An equipped play area at the village hall is located a short distance to the east, however, is in need of improvement and unlikely to serve the development in its current condition. A route through the woodland to the playing field and play area should be explored to increase access and justify improvements to the existing play space. If access is not possible the existing equipped play space should be improved as an important recreation facility in the village.

**Conclusion**

The site is located adjacent to the existing built up area and the site provides an opportunity for housing to be delivered where facilities are available and is unlikely to have a significant adverse impact on the landscape. The site is located opposite the primary school and other facilities in the village include a village hall, public house, equipped play areas and playing fields. There is a bus service to Beccles where additional services and facilities are available. This site is adjacent existing development to the east along with some woodland. This woodland provides an opportunity for landscaping to be provided north of the development to integrate it into the surrounding countryside and the built up area. Access to the site could be enhanced by connecting to the Public Right of Way located west of the site and ensuring this is well overlooked by new development. Existing footways connect the site to facilities in the village increasing its sustainability.

This site has been allocated under Policy WLP7.17 of the First Draft Local Plan for 40 dwellings (15 dwellings per hectare).
Site 199 – Land south of King’s Lane, Weston

Suggested Use: Housing
Site Area: 0.65

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site has been explored in addition to the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from King’s Lane.

Telephone cables traverse the site.

There could be contamination from the sites current use for caravan storage.

The land is greenfield and is set within a linear urban development backing onto open countryside.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with access to services, the impact on the landscape, the loss of greenfield land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the character of the existing dwellings adjacent and nearby. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered for allocation as part of this Local Plan.
Site 211 - East of Cromwell Road, Ringsfield

Suggested use: Housing
Site Area: 0.56

Summary of Responses from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted following the consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated from the settlement and there is no pedestrian access, making the site unsuitable for development.

The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a moderate sensitivity, a moderate value and a moderate capacity for new development.

This site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with access to services, the impact on the landscape, the loss of greenfield land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were associated with the provision of housing to help meet local needs.

Mitigation measures could include planting and screening to integrate this site into the surrounding area and to mitigate some of the impacts on biodiversity.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Rumburgh

Site 197 - Adjacent Mill Bungalow, Rumburgh

Suggested Use: Housing  
Site Area: 1.40

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Mill Road.

The land is greenfield and is contained by existing residential properties.

The site has capacity for approximately 14 new dwellings at 10 dwellings per hectare.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land, the impact on biodiversity and the impacts on sustainable movement patterns. There is an unknown affect on the accessibility of some services.

Minor positive effects were identified in relation to the impact on health and well-being, the provision of housing that could meet a local need and the impact on the landscape.

Mitigation measures could include a low density development with landscaping along the east boundary and design of properties reflecting the character in the village and setting of the equipped play space located opposite. Existing hedgerows should be protected and enhanced where possible.

Conclusion

The site is located in the central area of Rumburgh well related to the existing built up area. Housing is characterised by low density and the site is contained within the wider landscape. The site has good access to the public house and is located opposite the equipped play space. The majority of services and facilities are available in Halesworth by private vehicle and any scheme should make allowances for this. A scheme should be designed to reflect and enhance the setting of the play area located opposite which creates a focal point in this part of the built up area.

This site has been allocated under Policy WLP7.18 of the First Draft Local Plan for 12 dwellings (9 dwellings per hectare).
Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site could impact on the setting of listed buildings and a Scheduled Monument:

- Elm Farmhouse to the east is Grade I listed;
- Church of St James to the north east is Grade I listed;
- Moated site to the north east is a Scheduled Monument.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

St James South Elmham Parish Meeting stated the scale of the development is inappropriate for the size of the village, would adversely affect the settlement’s rural character and is inconsistent with the growth options set out in the consultation document. The infrastructure in the village needs to be improved and the population growth would overwhelm current provision. There are no local employment opportunities in the area. It was suggested a limited amount of development in the village that reflected its rural character could be considered (1-2 dwellings per year).

Three members of the public raised concerns that the amount of development proposed was inappropriate and would have an adverse impact on the village. It was commented there was a lack of infrastructure to support development and no services or facilities (school, shop, public house) were available and there are issues with power supply and low water pressure. With no public transport, people are reliant on private vehicles and the road network consists of narrow lanes which are widely used by agricultural traffic.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from St James Lane.

The foul sewerage network would need improvements to accommodate development. Telephone cables traverse part of the site.

There is a small risk of surface water flooding to the south, with a higher risk to the north west.

The land is greenfield and has a hedgerow along the eastern boundary. Development on the site would be highly visible and could alter the character of the area.

The site has capacity for approximately 5 new dwellings at 5 dwellings per hectare. New dwellings should be built next to the road to avoid encroachment on the countryside.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land, lack of services and facilities, the effects of climate change relating to flood risk and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.
Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible. Deliver in several small phases over the plan period.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 150 - The Street, St James South Elmham

Suggested Use: Housing
Site Area: 3.30

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site could impact on the setting of listed buildings:
- Abbey Farmhouse and barn are Grade II listed;
- The Thatched Cottage is Grade II listed;
- Brook Cottages are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.
St James South Elmham Parish Meeting stated the suggested scale of the development is inappropriate for the size of the village, adversely affect the rural character of the village and is inconsistent with the growth options set out in the consultation document. The increase of population could not be supported by the lack of infrastructure in the village. There are no local employment opportunities in the area. A limited amount of development in the village that reflected its rural character could be considered (1-2 dwellings per year).

Three members of the public raised concerns that the amount of development proposed was inappropriate and would have an adverse impact on the village. Comments stated there was a lack of infrastructure to support development and no services or facilities (school, shop, public house). There are issues with power supply and low water pressure. With no public transport people are reliant on private vehicles. The road network consisted of narrow lanes and these are well used by agricultural traffic.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site can be gained from The Street.

The foul sewer network would need improvements to support development. Electricity and phone lines cross the site.

Some areas of moderate surface water flood risk.

The land is greenfield. Trees and hedges can be found on site but the site is exposed to a wide open field to the south. Development on this site would be highly visible and would impact views across the countryside.

The trees and hedges found on site may provide habitats for local wildlife.

The neighbouring builder’s yard and farms may create issues with noise and odour.

The site has capacity for approximately 5 new dwellings. These should be placed along the road frontage.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land, lack of services and facilities, flood risk and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.
Mitigation measures could include the design of the scheme to be set within the landscape. Deliver over several phases during the plan period.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
St Margaret South Elmham

Site 149 - The Street, St Margaret South Elmham

Suggested Use: Housing  
Site Area: 1.92

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling works.

Historic England stated the site could impact on the setting of listed buildings and a Scheduled Monument:

- Greenside Farmhouse to the south west is Grade II listed;
- Post Office Stores Thimble Cottage to the north west is Grade II listed;
- Moated site to the east is a Scheduled Monument.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Flixton, South Elmham St Cross & St Margaret Parish Council provided a response based on a parish meeting attended by local residents. The Parish Council and community objected to the site and amount of housing proposed, however, it was suggested that a limited amount of development may be acceptable provided it was in keeping with the character of the area. This was caveated by stating the community should be consulted at all stages when any schemes are considered. Affordable housing could benefit the village. New development should be on infill sites and alternative sites could be considered rather than site 149.

Issues that make large development unsuitable in the village include the lack of local employment, remoteness from services and facilities, no public transport, poor utilities. It was considered that development could adversely affect the character of the village and there was no evidence of demand for housing and new development could create second homes. Access to the site would be across Common Land which would involve issues related to permissions. Some residents do not want any development citing that several years ago WDC designated the village as a ‘dead village’ meaning no new development would take place.

Regarding the consultation process, the proposed figure of 57 dwellings gives no regard to the thoughts of the landowner, community or the environment and has created significant discord that could be detrimental to WDC looking for suitable development sites in the future.

Four members of the public objected to the amount of development proposed. Comments and concerns reflected those set out in the response submitted by the Parish Council.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site can be gained from the Street.

Foul sewerage improvements would be needed to support development. There is a low encroachment risk on the water recycling centre. Electricity and telephone cables traverse part of the site.

There are areas of flood risk on the eastern side of the site.

The land is greenfield and is set in an area of flat countryside. Hedges run along the south and western boundaries and some trees are located to the north east.

The farm opposite the site could create issues relating to noise and odour.

The site has capacity for approximately 8 new dwellings limited to the site frontage.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land, lack of services and facilities, flood risk and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Shipmeadow

Site 146 - The Hill, Shipmeadow

Suggested Use: Housing
Site Area: 2.03

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

The Broads Authority commented the site is located on rising ground and there is potential for adverse impacts on visual amenity and landscape character. The area, while outside the Broads, contributes towards its character. Any scheme would need to mitigate likely impacts.

The Environment Agency stated the site is located within a Source Protection Zone 1 area.
Historic England stated there could be potential impact on the setting of listed buildings:
- former Wangford Hundred Workhouse and the Chapel to the south are Grade II listed;
- Manor Farmhouse and barn to the north are Grade II listed;
- Church of St Bartholomew to the east is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

Barsham and Shipmeadow Parish Council objected to the proposed site as the scale of the development would double the size of the hamlet, there would be an adverse impact on the landscape, a proposal of 60 dwellings would be too dense and the infrastructure will not be able to cope. There are no local facilities or employment opportunities. It was added people living in the development would be reliant on the car as there are no footways, cycle paths or public transport along a busy road.

Comments put forward by Barsham and Shipmeadow Village Hall reflected concerns raised by the Parish Council. The proposal would not be in keeping with the character of the parish, the scale of development is too large, no services or facilities are available, there is no local employment and traffic along the B1062 is a concern.

Five members of the public objected to the site raising the following concerns:
- adverse impact on a heritage asset, the landscape and wildlife;
- scale of the proposal is not reflective of existing development;
- there are no services or facilities available and there is limited infrastructure with a comment stating drainage and sewerage pipes traverse the site;
- it is difficult to access the B1062 safely;
- adverse impact on the setting and views from existing properties which would affect property prices and detract from living in the workhouse development.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. There are power lines traversing part of the site.

There are small areas of surface water flooding.

The land is greenfield. The site is located within a Tributary Valley Farmland landscape character area and is prominent in the landscape.

Several Grade II listed buildings are located nearby.

The site has capacity for approximately 6 new dwellings based on being limited to road frontage.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, limited access to services and facilities, loss of Grade 3 agricultural land, the impact on biodiversity, the impact on the historic environment and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible. Connections to Bungay should be improved.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Somerleyton

Site 2 - Allotment land, Somerleyton

Suggested Use: Housing
Site Area: 1.60

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Full details are on the Council’s website.

Historic England stated the proposal could impact upon the Conservation Area, Historic Parks and Gardens and the setting of listed buildings:
- Somerleyton Park Historic Parks and Gardens;
- The Rosary;
- The Green and the village pump;
- The Old Farmhouse;
- County Primary School;
- number of dwellings nearby that are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red’ impact (historic landscape).

Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for housing development because would result in an adverse impact on local amenity. The site is located in the Conservation Area and a special landscape area. The proposal would conflict with national planning guidance.

The Suffolk Wildlife Trust suggested the site may contain habitats and species of conservation value and should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

The landowner, the Somerleyton Estate, suggested the site could accommodate 20-25 dwellings (including 7 affordable units) to reflect local character. The site is currently used for allotments, which would be relocated on land owned by the Estate, but is otherwise unconstrained. The respondent highlights several issues with the Sustainability Appraisal which do not take into account the proposed replacement facilities, the full suite of facilities in the village, potential provision of affordable units and that the hedgerows will buffer the development. As such the Sustainability scores should be higher than indicated.

One member of the public suggested the site was appropriate as it was in a central location with respect to the village but the allotments should be relocated and the site should be brought forward in conjunction with site 47 to provide access.

Five members of the public objected to the site raising concerns about potential development on this site which included:
- issues with vehicle access down an unadopted narrow lane and parking would be an issue;
- adversely affect the character of the cottages on The Green and the village;
- this is the best location for allotments in the village and these are well used;
- water pressure is low in the village and development will make this worse;
- lack of access to services and facilities such as doctors and schools and there is a need to provide infrastructure to support new development;
- brownfield sites within larger settlements should be prioritised for development before the countryside.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this site would lead to a loss of allotments with no scope for their replacement.

The site can be accessed from The Green.
Foul sewerage improvements would be needed to support development. Power lines traverse the site.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the Broads. The site is exposed and not consistent with the existing settlement pattern.

There is potential for archaeology on site. Any planning application should be supported by the results of a programme of archaeological evaluation. The site lies within the Somerleyton Conservation Area and there are listed buildings adjacent

The site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the loss of Grade 2 agricultural land and the effect on the historic environment. Minor negative effects were associated with the loss of allotments and the impact on the landscape.

Minor positive effects were identified in relation to the provision of housing in an accessible location for private vehicles and train travel which will help encourage healthy lifestyles.

Mitigation measures identified by the assessment relate to the need for an archaeological investigation and a scheme design to mitigate impact on the listed buildings. Replacement allotments could be provided. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located adjacent the existing village and is an opportunity to provide a mix of housing tenures needed in the area. The site is currently used for allotments and development of the site would result in the loss of these community facilities having an adverse impact on the community. The allotments form part of the Conservation Area and development would have an adverse impact on this designation. There is also likely to be an impact on the landscape as the development would extend into the open countryside and create an exposed settlement edge. The site has access to a footway which connects to the village, however, vehicular access is through a narrow access road which cannot be widened potentially creating issues in a sensitive area. This site is not considered suitable for allocation as part of this Local Plan.
Site 47 - Land at the Former Garage, Somerleyton

Suggested Use: Housing
Site Area: 0.65

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site is in the Conservation Area and could impact upon the Conservation Area, Historic Parks and Gardens and the setting of listed buildings:

- Somerleyton Park Historic Parks and Gardens;
- The Rosary;
- The Green and the village pump;
- The Old Farmhouse;
- County Primary School;
- number of dwellings nearby that are Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact on historic building and landscape.

Ashby, Herringfleet and Somerleyton Parish Council stated that some parts of the site are leased by third parties. Access to the site shown is unsuitable and a large part of the garage site and oil storage yard is likely to be contaminated. However, the site is not completely rejected and it might be considered for a smaller number of houses than the indicative number and if the problems can be overcome.

The landowner, the Somerleyton Estate suggested the site could accommodate 12-15 dwellings. It was suggested the Sustainability Appraisal score should be higher to reflect the good provision of services in the village.

Two members of the public supported the site being brought forward while two others objected. It was suggested the site could accommodate 6-8 dwellings on a partially brownfield site including the potential for affordable units in an area that is not affordable for many people. Development of this site would not result in the encroachment on existing green space in the village. It was noted the site is within waking distance of the school and has good access to the A1074 to Lowestoft.

Additionally, it was commented the site is in the Conservation Area and new development would increase the amount of traffic, on-road parking and risk of accidents. Access to the site would be close to existing properties and new dwellings would be overlooking those already there affecting amenity. It was added the site will be contaminated as there have been several spillages from the oil tanks over the years. It was added that there is limited infrastructure in the village (sewerage, utilities, roads), result in the loss of agricultural and adversely affect the character of the village.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development.

The site has been used as a petrol station and chemicals stored onsite. There is potential for contamination.

The land is part greenfield and part brownfield. The Settlement Fringe Landscape Sensitivity Study identifies the area as having a low sensitivity, a high value and making a major contribution to the setting of The Broads. As a result this landscape area has a low capacity for development. The site is contained to the east and south but exposed to the west.

A Heritage Asset Assessment should support any planning application. There is potential for archaeological finds and a programme of archaeological work will be required. The site lies within the Somerleyton Conservation Area and listed buildings are located near the site.
The site could contribute to the regeneration of the area through the removal of derelict industrial buildings.

The site has capacity for approximately 13 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of some Grade 2 agricultural land, the impact on the conservation area and the loss of employment land.

Minor positive effects were identified in relation to the provision of housing, access to services and facilities, the impact on the landscape, the use of some brownfield land and the promotion of sustainable movement patterns.

Mitigation could be provided through quality design to reflect surrounding character and the Conservation Area. Existing hedgerows should be protected and enhanced where possible. A contamination study will be required to demonstrate if measures are required for mitigation.

**Conclusion**

The site is located within the built up area of the village and is contained within the wider landscape reducing its potential impact on the landscape. The site was formerly used as petrol station (brownfield) and the rear of the site has potential for contamination which will require a planning condition as part of any planning permission. The site is located within the Conservation Area and a locally listed building is found on site. Given the character of the site redevelopment has potential to improve the area. To mitigate potential impact on the listed building a heritage assessment will be required. Related to heritage there is a high potential to find archaeology on site and a planning condition will also be required. There is access to a limited number of services and facilities in the village and a footway connects the site to these. Redevelopment of the site will need to ensure that access is retained for adjacent properties on the south side of the site. This has potential to improve the area and is likely to have limited impact on the townscape and landscape. For these reasons the site is supported.

This site has been allocated under Policy WLP7.5 of the First Draft Local Plan for 10 dwellings (15 dwellings per hectare).
Site 74 - Land north of Morton Peto Close, Somerleyton

Suggested Use: Housing
Site Area: 0.27

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site was located in the Conservation Area and could impact upon the Conservation Area the setting of a listed building:
- Widows Cottage located opposite is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.

Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for housing development because it is open space and would result in the whole Morton Peto Close area being overdeveloped and
out of character with the rest of the village. The site is within the Conservation Area and is landscaped with trees.

The landowner, the Somerleyton Estate suggested the site could accommodate at least 5 dwellings to reflect the surrounding area. The site is an irregular shape but provides opportunities to minimise potential impact on local amenity. The site could have direct access onto The Street. The loss of amenity green space could be compensated by alternatives nearby. It was suggested the Sustainability Appraisal incorrectly identifies the proposal resulting in the loss of open space as this would be compensated by development on other proposed sites. It was also suggested the site should be identified as being more sustainable as there is good access to facilities in the village.

The two members of the public objected to the proposal suggesting the area would be overdeveloped.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

Development on this site would lead to a loss of amenity green space which is essential to the village setting.

The site is made up of settled farmland and the existing residential buildings are currently 2 storey dwellings.

Mature trees are located in the centre and around the periphery of the site.

The site is located within the Somerleyton Conservation Area.

The site is not considered suitable for development.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with the loss of Grade 2 and 3 agricultural land and the impact on the Conservation Area. Minor negative effects were associated with the loss of open space, the impact on the landscape and the impact on biodiversity.

Minor positive effects were identified in relation to the provision of housing and the promotion of sustainable movement patterns.

A heritage asset study will be required and any scheme will be need to be designed so not to impact on the listed buildings. Existing trees should be protected and enhanced where possible.

**Conclusion**
The site is currently used as public open space and is located within the Conservation Area. Loss of the site would adversely affect the character of this area of the settlement and result in the loss of a community asset. Other sites being considered are preferable. This site is not considered suitable for allocation as part of this Local Plan.
Site 99 - Land south east of Brickfields, Somerleyton

Suggested Use: Housing
Site Area: 0.47

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the site could impact upon the Conservation Area the setting of listed buildings:
- White House to the north east is Grade II listed;
- Pond Cottages to the north east are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for housing development because it is located in the open countryside and has little connection with the centre of the village. Access to the site would be via a dangerous corner where The Street meets Slugs Lane.
The landowner, the Somerleyton Estate suggested the site could accommodate at 8-12 dwellings including 2-4 affordable units. Access to the site would be via a short stretch of private road owned by the Estate and there is good visibility at the junction with the Street. The site is currently used for agriculture and is classified as Grade 3. The respondent suggested the site relates to the existing built area satisfactorily and the village has a full suite of facilities and therefore the score in the Sustainability Appraisal should be higher than indicated.

One member of the public commented that the site could accommodate 5-6 dwellings but this would result facilitate encroachment into the open countryside and is not well located with respect to the centre of the village. This is the former site of the brick kilns and is an important historical area of the village. The site supports a variety of flora and fauna which would be adversely affected by light pollution. The development would increase the traffic in the village and access to the site is poor. Three people objected to the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from the private road to Somerleyton Marina.

Foul sewerage improvements would be needed to support development.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of low landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the Broads. The site is contained to the north and east but does not relate to the existing settlement.

Developing this site could create an exposed settlement edge.

The site has capacity for approximately 14 new dwellings at 30 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the lack of local services, the impact on the landscape, the loss of Grade 3 agricultural land and the sites archaeological potential.

Minor positive effects were identified in relation to the provision of housing, access to services and the promotion of sustainable movement patterns.

Mitigation could be provided through quality design and the use of landscaping to reflect the surrounding character of the Broads.
**Conclusion**

The site is adjacent the built up area but does not reflect the built character of the settlement. The site is of rural character and development would have an adverse impact on this character. The site has low landscape sensitivity but it is important for its contribution towards the setting of the Broads. There is potential for archaeology to be found on site and this would require a planning condition to mitigate this. Other sites are considered to have less of an adverse impact on the character of the settlement therefore this site is not considered for development. This site is not considered suitable for allocation as part of this Local Plan.
Site 127 - Mill Farm Field, Somerleyton

Suggested Use: Mixed use
Site Area: 3.03

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated there could be potential impact on the Conservation Area, Historic Park and Garden and the setting of a listed building:
- adjacent to the Conservation Area;
- adjacent to Somerleyton Park and Gardens;
- Widows Cottage nearby is Grade II listed;
- The Rosary nearby is Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (known monuments).

Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for development as the proposal is too large and out of keeping with the character of the village. Less dense development on the site would also be unacceptable. The landowner has not reached any agreement with the owner of the existing village hall.

Somerleyton Estate suggested that housing (20-25 dwellings including 7 affordable units to reflect local character) would be appropriately located on the western part of the site, leaving the eastern part of the site free of development. The site is currently used for agriculture and classified as Grade 3. The Sustainability Appraisal showing the site developed in conjunction with site 135 is correct while the Sustainability Appraisal looking at the site independently is incorrect and provides a lower sustainability score than expected. They reiterated the site has a good array services and facilities and this should be reflected in the Sustainability Appraisal.

It was commented the site is not desirable but could accommodate 10-12 affordable and starter dwellings with open space on less than half of the site. It was added that the land consists of two distinct fields with the west having potential of a limited amount of housing (which will be considered during the preparation of the Neighbourhood Plan) but the eastern field is important for flora and fauna. If any development comes forward it should be supported with adequate infrastructure.

Members of the public raised the following concerns:

- no bus service and the train provides one service every two hours;
- access to the train station is down a steep, narrow lane with no footway making it unsafe for many people;
- roads around the village are narrow;
- little employment in the village;
- the school is at capacity;
- adverse impact on wildlife;
- potential drainage issues.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. A sewer pipe and telephone lines cross the site.

The land is greenfield. The Settlement Fringe Landscape Sensitivity Study identifies this site as having a low sensitivity, a high value and making a major contribution to the setting of The Broads. As a result this landscape area is identified as having a very low capacity for new development. The site is flat and contained within the landscape. There could be some exposure to rural areas to the southeast.
There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork. The Somerleyton Historic Park is located to the east. The Conservation Area is adjacent the site.

The site has capacity for approximately 75 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land and the impact on the conservation area.

Minor positive effects were identified in relation to the provision of housing, access to services and promoting sustainable movement patterns. There is a potential effect on the landscape.

Mitigation could be provided through quality design to reflect surrounding character and the Conservation Area. Amenity green space and landscaping should be provided at the northern part of the site to reflect the existing character and protect the Conservation Area and setting of listed buildings. Existing hedgerows should be protected and enhanced where possible.

**Conclusion**

Development of this site is likely to have the most minimal impact on the character of the village and setting of listed buildings compared to other possible sites for development in the village. The land is well related to existing development and has good access to existing community facilities. Landscaping will be required to preserve the open character of the area and contribute towards integrating new dwellings into the existing settlement.

This site has been allocated under Policy WLP7.6 of the First Draft Local Plan for 45 dwellings (18 dwellings per hectare) and provision of open space.
Site 128 - Mill Farm, Somerleyton

Suggested Use: Housing
Site Area: 1.19

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

Historic England stated the site was located within the Conservation Area and could impact on the Conservation Area and the setting of a listed building:
- Widows Cottage nearby is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (historic building).

Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for inclusion in the new Local Plan because it is a working farm held on a lifetime tenancy by the farmer.
The landowner, the Somerleyton Estate stated the site is well related to the surrounding built up area and none of the agricultural buildings are statutory listed although the site is located within the Conservation Area. The existing buildings would remain as part of any future development. It was thought that 15 dwellings (including 5 affordable units) would be in keeping with local character. The site has significant frontage onto The Street and existing access with good visibility. The respondent suggests that the amenity land proposed as part of the plan should be considered as part of the scheme and there are a full suite of services and facilities therefore the site should be given a strong positive score in the Sustainability Appraisal. Additionally, the buildings are only locally listed therefore the Sustainability Appraisal score should be neutral rather than negative. The site is currently used for farming and arrangements have been made to move the tenant farmer to more modern buildings locally.

The tenant farmer provided comments about the site and the proposals submitted. It was stated the plans show Mill Farmhouse (residence) to be redundant which is incorrect as it is used all year round and refurbished in 2014. The farm buildings are integral to the farm and its operation as a successful business (financial accounts can be provided). The farmer is the second generation of a three generation full agricultural tenancy. It was stated the farm has long been a feature of the character of Somerleyton and its loss would adversely affect the Conservation Area and residential amenity. The conflict between the new development and the working farm is unlikely to be mitigated satisfactorily.

Members of the public commented that while the farm was viable it should not be developed. However, potentially the site could accommodate 8-12 dwellings and open space. Primary concerns raised were the value the farm has to the character and setting of the village.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from The Street.

Foul sewerage improvements would be needed to support development. A sewer pipe also traverse the site.

The land is greenfield. The Settlement Fringe Landscape Sensitivity Study identifies this site as partly within a landscape area that has a low sensitivity, a high value and making a major contribution to the setting of The Broads. As a result this landscape area is identified as having a very low capacity for new development. The site extends out into the open countryside.

A pond and hedgerows are located on site which may provide habitats for local wildlife.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork. Listed buildings are located on the site and a Heritage Asset Assessment will be required with a planning application.
The site has capacity to accommodate approximately 15 new dwellings at 20 dwellings per hectare.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of Grade 2 agricultural land. Minor negative effects were associated with the impact on the landscape, the loss of biodiversity and the impact on the Conservation Area.

Minor positive effects were identified in relation to the provision of housing, access to services and promoting sustainable movement patterns.

A heritage asset study will be required and any scheme will be need to be designed to reflect the heritage value. Existing hedgerows and trees should be protected and enhanced where possible. An ecology assessment on the pond may also be required.

Conclusion

The landowner has withdrawn this site from further consideration.
Site 135 - Playing Field, Somerleyton

Suggested Use: Mixed use
Site Area: 3.18

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated the proposal could impact upon the Conservation Area and the setting of listed buildings:
- White House to the north is Grade II listed;
- Pond Cottages to the north is Grade II listed;
- Widows Cottage to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.
Ashby, Herringfleet and Somerleyton Parish Council stated the site is not suitable for inclusion in the new Local Plan because it would result in the loss of the playing field and is contrary to the NPPF. This is one of the few large green spaces accessible to the public and is used for league cricket. New housing will create traffic problems on Station Road. A large part of the site is on a long-term lease to the Somerleyton Community Association (who also own a small part of the site) and no agreement has been reached about any alternative use of the site.

The landowner, the Somerleyton Estate recognised that development of the site and loss of community facilities would need to be compensated. The total site is 3.2ha and the total development area could be less than with 1.6ha. This would be dependent on the degree of retention of existing playing field and play facilities which may be surplus to requirements. The Estate is currently investigating if there is support for the proposal and replacement facilities within the village. It is suggested that 20-25 (with 7 affordable units) would be in keeping with the character of the village. It is suggested the Sustainability Appraisal score for the site should be raised to reflect the good provision of services and facilities in the village.

Five members of the public objected to the site commenting that it was a local green space and a valuable asset for the community. The cricket pitch is used for County matches by the Blundeston and Somerleyton Cricket Club. The tennis courts are used twice weekly by the local club and individual players. The play equipment is well used particularly by small children when grown ups are playing sport. The field is also used for general recreation purposes.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

Development on this site would lead to a loss of an equipped play and sport pitch which is an important recreation area for the settlement.

The site can be accessed from Station Road.

Foul sewerage improvements would be needed to support development.

The land is greenfield. The Settlement Fringe Landscape Sensitivity Study identifies this site as having a moderate sensitivity, a high value and making a major contribution to the setting of The Broads. As a result this landscape area is identified as having a very low capacity for new development. The site is contained within the landscape by hedgerows.

There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork. Waveney Grange Farm is locally listed and located opposite the site.

The site is not considered suitable for development.
Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the loss of public open space. The site is located adjacent the Conservation Area. Minor negative effects were related to the loss of Grade 3 agricultural land and the impact on the Conservation Area.

Minor positive effects were identified in relation to the provision of housing and the promotion of sustainable movement patterns. There is a potential impact on the landscape relating to the sites relationship with the existing built up area.

Mitigation measures could include replacement open space and a scheme design to make a development with a low level of prominence in the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is the main recreation site for local residents. Development of the site would result in the loss of existing playing fields (cricket) and equipped play space. Replacement facilities will need to be provided in the village as no others are located in the vicinity. Development of the land would result in the loss of Grade 2 agricultural land, however, the site is not used for these purposes. Several listed buildings are located to the south east of the site with hedgerows and trees in between and there is potential for archaeology to be found on site. Reflecting the loss of facilities development of this site without replacement facilities in a better and more accessible location is not considered appropriate. This site is not considered suitable for allocation as part of this Local Plan.
Site 127 & 135 - Mill Farm Field & Playing Field, Somerleyton

Suggested Use: Mixed use
Site Area: 3.03

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation
See responses for sites 127 and 135.

Summary of Draft Strategic Housing and Economic Land Availability Assessment
See summaries for sites 127 and 135.

Summary of Draft Sustainability Appraisal
The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land, the impact on the landscape and the impact on the conservation area.
Minor positive effects were identified in relation to the provision of housing and the promotion of sustainable movement patterns. There are potential effects relating to access to local services and the relocation of playing fields.

Mitigation could include a scheme designed to reflect the Conservation Area, increase natural surveillance of the playing area compared to its current situation, linking in with existing community facilities nearby and providing improved facilities over what currently exists. Using quality design to reflect surrounding character and the Conservation Area would also assist a development proposal.

**Conclusion**

This combination of site development and reprovision of community facilities has not been put forward in the First Draft Local Plan. Whilst relocation of facilities could help create a clearer focal point in the community opposite the open character afforded by Mill Farm and would link well with a replacement village hall in an accessible location, the existing provision is well established and it is considered this would place an unnecessary risk to these facilities. A proposal for bringing forward a development involving sites 127 and 135 to provide housing and relocate existing facilities is therefore not considered suitable for allocation in this Local Plan.
Sotherton

Site 58 - Land east of 17-25 Sotherton Corner, Sotherton

Suggested Use: Housing
Site Area: 1.82

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre.

Historic England stated the site could impact on the setting of listed buildings:
- Sotherton Hall and barn to the north are Grade II listed;
- Valley Farmhouse, two barns and the Service Range are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/’ impact.
Four members of the public objected to the site. Several concerns about the site put forward for development were raised. These included:

- lack of services and facilities (school, shop, church, public house, play area, broadband) and there is no public transport;
- the roads are narrow and well used by agricultural machinery;
- the scale of the proposed development is too large for the settlement and would adversely affect the rural character of the area;
- the existing settlement supports tourism through holiday lets and this could be adversely affected.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from St John’s Road, which is narrow and unlikely to be suitable for development.

Foul sewer improvements would be needed to accommodate development. Electricity and telephone cables are located near the site boundary. There is a low encroachment risk on the water recycling centre.

There are areas of low, medium and high surface water flood risk.

The land is greenfield and is bordered by hedges on all sides. Trees can also be found on site. The surrounding area are predominantly large, flat fields and so development would be conspicuous and would alter the character of the area.

It is the site of a former common.

The site has capacity for approximately 5 new dwellings due to the poor access and isolated location.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of services and facilities, flood risk associated with climate change, the loss of Grade 3 agricultural land, the impact on the historic environment and the impacts on sustainable movement pattern.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.
**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Uggeshall

Site 15 - Firs Garage, Church Road, Uggeshall

Suggested Use: Housing
Site Area: 0.50

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Mary nearby is Grade I listed;
- Church Farmhouse nearby is Grade II listed;
- Uggeshall House nearby is Grade II listed;
- Churchyard walling nearby is Grade II listed;
• Whitehouse Farm and barn nearby are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green’ impact.

One member of the public objected to the site stating the proposal would have an adverse impact on the rural character of the village, there is a lack of infrastructure and new development would be a dormitory housing area.

*Summary of Draft Strategic Housing and Economic Land Availability Assessment*

The assessment did not identify any constraints or impacts that could not be mitigated. Access from the site is gained from Church Road.

Foul sewerage improvements would be needed to support development. This would require substantial off-site infrastructure that may not be economically viable. There are power and telephone cables traversing the site.

There is the potential for contamination from the motor garage and other buildings.

The land is part brownfield and part greenfield. The site is contained within the area and the surrounding countryside is undulating.

The site has capacity for approximately 5 new dwellings at 10 dwellings per hectare.

*Summary of Draft Sustainability Appraisal*

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the limited access to services, the impact on biodiversity, the loss of employment land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need. There are potential impacts on the landscape and natural resources as well.

Mitigation measures could include the design of the scheme to be set within the landscape including planting and screening. Existing hedgerows and trees should be protected and enhanced where possible. The site should be considered in conjunction with site 113.

*Conclusion*

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 113 - Land to the north west of 1-4 Wangford Road, Uggeshall

Suggested Use: Housing
Site Area: 2.12

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. Substantial off-site infrastructure would be required to connect the foul sewerage network which may not be viable.

Historic England stated there could be potential impact on the setting of listed buildings:
- Church of St Mary nearby is Grade I listed;
- Church Farmhouse nearby is Grade II listed;
- Uggeshall House nearby is Grade II listed;
- Churchyard walling nearby is Grade II listed;
- Whitehouse Farm and barn nearby are Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.

One member of the public responded and objected to the site stating the proposal would have an adverse impact on the rural character of the village, there is a lack of infrastructure and new development would be a dormitory housing area.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site is accessible form Church Road and Wangford Road.

Foul sewerage improvements would be needed to support development. This would require substantial off-site infrastructure that may not be economically viable.

The land is greenfield. Nearby housing is spread along the road and is two storey. Landscape is undulating with views to the south.

Hedgerows are located around the perimeter of the site.

The site has capacity for approximately 17 new dwellings at 8 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

A significant adverse impact was associated with the loss of Grade 2 and 3 agricultural land. Minor negative effects were associated with the lack of services, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need. There is also a potential impact on the landscape relating to the site’s ability to be integrated into the surrounding landscape.

Mitigation measures could include the design of the scheme to be set within the landscape. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Wangford

Site 30 - Land adjacent to Elms Lane, Wangford

Suggested Use: Housing
Site Area: 10.00

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building:
- Elm Farmhouse and malting to the south are Grade II listed.

National Grid stated the site is traversed by intermediate and high pressure gas apparatus and proposals should take note of guidance when considering bringing this site forward.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber’ impact.

The three representations objected to the site being used for housing development citing the following issues:

- the site is outside the village envelope, located in the AONB and would have an adverse impact on the aesthetics of the village and existing properties;
- scale of development is inappropriate for the size of the village;
- development would result in the loss of greenfield land and brownfield sites should be prioritised;
- there is poor access off of the A12 increasing risk to safety and access to the site is along minor roads that are inadequate;
- recently installed water mains cross the site;
- there is a risk of new dwellings being used as second homes.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Access to the site can be achieved off Elms Lane which would not be able to support a large development at its current capacity.

The foul sewerage network would require improvements to support development.

There are small pockets of surface water flood risk.

The land is greenfield, within the AONB and has low capacity to support development. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the AONB. The south part of the site slopes north to south and extends to the existing village. The north part of the site is flat and rural in character. Key views are southwards to the church.

Ponds in the north east corner of the site and hedgerows could provide habitats for local wildlife.

Elms Farm and maltings are Grade II listed. There is potential for archaeological finds. Any planning application should be supported by the results of a programme of archaeological evaluation including appropriate fieldwork.

There is the possibility of a noise issue from the A12. The site would form too large an extension to the village, however part of the site closest to Elms Lane could support limited development. A housing density of 20 dwellings per hectare is considered appropriate given character of surroundings.

Summary of Draft Sustainability Appraisal
Significant negative effects were associated with the impact on the landscape and the loss of Grade 2 agricultural land. Minor negative effects were associated with listed buildings, the loss of biodiversity, the impact on the historic environment and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the heritage value of the listed buildings. Existing hedgerows and trees should be protected and enhanced where possible. Improve connectivity for cyclists to Reydon to access employment.

**Conclusion**

The site is located within the Area of Outstanding Natural Beauty and like much of the area has limited capacity for development without compromising the designation. The site is greenfield and is classified as a blend of Grade 2 and 3 agricultural land and its loss is not considered to be significant. The village has good access to the A12 towards Lowestoft (and south towards Ipswich), however, because of the proximity of the site to the busy road a scheme would need to be designed to mitigate the impact of noise. The site can be accessed from Elms Lane but this lane is narrow and there are no footways to access facilities such as the recreation area in the village. There are constraints related to existing infrastructure including the water recycling works and foul water network and underground infrastructure is present. The impact on these facilities can be addressed as part of any planning application in the future.

There are listed buildings adjacent the site associated with the farm and potential impact on these would need to be considered as part of a heritage assessment. Reflecting the landscape sensitivity of the site and how it relates to the existing village development of the entire site would have an adverse impact on the character of the area. However, development of the area located on the south western part of the site defined by a boundary between the scrub area to the west and Elm Farmhouse to the east could be feasible.

A small part of this site has been allocated under Policy WLP7.7 of the First Draft Local Plan Part of the site (0.89 hectares) for 16 dwellings (18 dwellings per hectare).
Site 31 - Land adjacent to Little Priory, Church Street, Wangford

Suggested Use: Housing
Site Area: 0.25

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and a ‘Green’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre.

Historic England stated the site was located in the Conservation Area and could potentially impact on the Conservation Area and listed buildings:

- Church of St Peter and St Paul adjacent and is Grade I listed;
- Little Priory to the north is Grade II listed;
- former Coach House to the north is Grade II listed;
- The Vicarage to the north is Grade II listed;
- Well Cottage to the north is Grade II listed;
• Baxter House to the north is Grade II listed;  
• number of properties to the north are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Red/Amber’ impact (visual impact assessment required).

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

Development on this site would have a significant effect on nearby listed buildings which would be difficult to mitigate and makes this site unsuitable for development.

There is a low encroachment risk to the water recycling centre.

There is the potential for contamination associated with past building.

The land is greenfield, however, it has been used for buildings in the past. There could be potential contamination from previous use. The site is located within the AONB and Rural River Valley landscape character area but is contained within the built up area. At a strategic level the Settlement Fringe Study suggests this site is in an area of very high landscape sensitivity and has a very low capacity to support development.

This site is not considered suitable for development.

**Summary of Draft Sustainability Appraisal**

Significant negative impacts were identified in relation to the setting of the Grade I listed church. Minor negative effects are associated with the impact on the landscape, biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, there is access to a limited number of services and facilities and the use of brownfield land.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the heritage value of the listed buildings. Existing hedgerows and trees should be protected and enhanced where possible. Improve connectivity for cyclists to Reydon to access employment.

**Conclusion**

Site does not have capacity to support five dwellings due to the potential to cause substantial harm to the setting of a listed building. Therefore, is not considered for allocation as part of this Local Plan.
Site 218 - Land north of Wangford Road, Wangford

Suggested Use: Housing  
Site Area: 1.17ha

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Low level power lines cross the site.

The land is greenfield, within the AONB and has low capacity to support development. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a very low capacity to support development because of its contribution towards the setting of the AONB. The land slopes north to south and any development should be low level to be contained within the wider landscape. Development could improve the current settlement edge.
The site could accommodate 22 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

Significant negative impact was related to the impact on the landscape. Minor negative effects were associated with the loss of Grade 3 agricultural land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include a low level scheme design to set the development within the landscape and relate to the existing built up area to the west. Existing hedgerows and trees should be protected and enhanced where possible. Improve connectivity for cyclists to Reydon to access employment and recreation areas.

**Conclusion**

There are limited development opportunities in the village because of the sensitive landscape. This site is considered to have a relatively small impact on the landscape compared to other possible sites for development around the village and provides an opportunity to improve the existing settlement edge in this location. The site is located not far from facilities in the village centre and is close to an existing bus service which provides access to nearby villages and towns.

This site has been allocated under Policy WLP7.8 of the First Draft Local Plan for 22 dwellings (20 dwellings per hectare).
Westhall

Site 123 - Lock’s Road, Westhall

Suggested Use: Housing
Site Area: 1.88

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Red’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of a listed building and a Scheduled Monument:
- St Georges House nearby is Grade II listed.
- Moatyards nearby is a Scheduled Monument.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’
impact.

Westhall Parish Council has serious concerns over the suitability of the site for housing development. The
village is centred around Wangford Road and this road is narrow with few passing places but is frequently
used by large vehicles and agricultural machinery. The Nollers Lane junction and single track road from the
village to the A143 is narrow with poor visibility. There is poor infrastructure with a lack of mains drainage,
no gas mains, unreliable phone coverage and BT considers fibre optic replacement to be uneconomic.
Significant infrastructure improvements would be required which would discourage developers. A 2008
opinion poll suggested most parishioners did want to see change in the village and this view has not
changed.

Of the 28 responses from members of the public none expressed support for the site with a couple
respondees suggesting a few dwellings on site could be accommodated or small scale developments
around the village would be more appropriate.

Objections and concerns were raised citing the following issues:

- the scale of proposed development is inappropriate for the size of the village and will have an
  adverse impact on the character of the village and surrounding rural area including wildlife;
- the village is characterised by ribbon development and the site would alter this characteristic
  suggesting infill type development is more appropriate;
- the road network is poor and is frequently used by farm related traffic and machinery and there is
  a risk to pedestrians, cyclists and horse riders;
- infrastructure in the village is poor (sewerage, drainage, gas, electricity, broadband);
- the shop will likely close when existing owner who is in his 90’s retires, the pub is frequently
  closing and reopening, the school is at capacity and there are no medical facilities;
- there is no public transport and no local employment so commuting traffic would increase;
- other sites are located closer to main roads and better infrastructure;
- a similar proposal was refused planning permission in the past citing lack of infrastructure;
- adverse impact on existing properties including loss of views over the countryside and privacy.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts that could not be mitigated. The site can be
accessed from Lock’s Road. The water recycling centre has significant constraints.

There is potential for archaeological finds on the site and a programme of archaeological work will be
required through a planning condition.

The land is greenfield.
The site has capacity for approximately 24 dwellings (13 dwellings per hectare reflecting the housing density and character of the nearby residential area).

**Summary of Draft Sustainability Appraisal**

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Minor negative effects are associated with the impact on the landscape.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect local character. Existing hedgerows should be protected and enhanced where possible. Properties to provide a frontage on the playing field to increase natural surveillance.

**Conclusion**

The site is well related to the existing built up area. There is good access to the site, and it is adjacent the village recreation area and reasonably contained within the wider landscape. The allocation is of a scale that reflects the size of the village and will provide a limited amount of new housing to support a rural community where little development has taken place in recent years.

The site extends into the open countryside north of the village but is relatively contained within the landscape, however, screening should be provided on the north part of the site as part of a landscaping scheme to reduce impact on the surroundings. To improve natural surveillance and integrate the development into the village any proposals should provide a frontage where properties face onto the existing playing fields, equipped play area and village hall.

This south part of the site has been allocated under Policy WLP7.21 of the First Draft Local for 12 dwellings (14 dwellings per hectare).
Willingham (Shadingfield and Willingham St Mary)

Site 59 - Land east of Chartres Piece, Willingham

Suggested Use: Housing
Site Area: 1.01

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre.

Historic England stated there could be potential impact on the setting of a listed building:
- Fox Farmhouse to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.
The landowner, Sotterley Estate stated the site relates well to the existing built form of the village and could accommodate 20 dwellings (including 6 affordable units) to be in keeping with local character.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Chartres Piece or Sotterley Road. Cycle access is good but there is no footpath.

Foul sewerage improvements would be needed to support development and there is a low risk of encroaching on the water recycling centre.

There are some records of surface water flooding on the site.

The land is greenfield and located in the Farmed Plateau Clayland character area. Screening currently softens the settlement edge. The Landscape Character Assessment suggested that a hard settlement edge should be avoided.

Hedgerows and mature trees could provide habitats for local wildlife and could be lost if the site is developed.

The site has capacity for approximately 20 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, lack of access to services and facilities, loss of undeveloped land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

Located on the edge of the existing built up area the site backs onto the existing settlement and would result in a small extension of the settlement into the open countryside creating a prominent settlement edge. There are no issues with infrastructure and the site has good access to the road network and a limited bus service to Beccles where services and facilities are available. This site is not considered suitable for allocation as part of this Local Plan, however, an amended site covering much of the same site that will...
have less of an impact on the landscape by making use of existing screening has been considered as site 220 which has been allocated as Policy WLP7.20 of the First Draft Local Plan.
**Site 64 - Land east of Woodfield Close, Willingham**

Suggested Use: Housing  
Site Area: 0.57

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**Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation**

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre and a sewer pipe traverses the site.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

The landowner, Sotterley Estate stated the site is used for agriculture and recently been used as a paddock. The site relates well to existing built form of the village and could accommodate 10 dwellings (including 3 affordable units) to be in keeping with local character. Development would be linear to reflect the form of Woodfield Close. The site can be accessed from Woodfield Close and Sotterley Road. It was
commented the site has not been used for agriculture to twenty years and the Sustainability score should be raised to reflect this.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development and there is a low risk of encroachment to the water recycling centre.

Mature trees, hedges and a pond are found on site which could provide habitats for wildlife.

The site has capacity for approximately 10 new dwellings at 17 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with access to services, loss of Grade 3 agricultural land, the impacts on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and the impact on the landscape.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible. An ecology study may be required to identify biodiversity value associated with the pond.

**Conclusion**

The site is adjacent the existing built up area with a wooded area to the east creating a site that is contained within the landscape. The site is located close to the playing field, however the existing footway does not extend to the site. If development comes forward the footway should be extended to connect the site to the existing network. Other facilities in the village include basic play facilities, village hall and the public house. The site can be accessed from Woodfield Close and there is good access to the road network to get to Beccles and a limited bus service is available. There is some potential for archaeological finds on the site and an archaeological condition will need to accompany any planning permission. Compared to other sites in the area this site is considered to be appropriate for development and is unlikely to have a significant adverse impact on the community.

This site has been allocated under Policy WLP7.19 of the First Draft Local Plan for 10 dwellings (17 dwellings per hectare).
Site 68 - Land North of Chartres Piece, Willingham

Suggested Use: Housing
Site Area: 0.64

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre and a sewer pipe traverses the site.

Historic England stated there could be potential impact on the setting of a listed building:
- Fox Farmhouse to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

The landowner, Sotterley Estate stated the site is used for agriculture (Grade 3) and is northeast of the playing field. As an alternative to site 134, this site could be allocated for housing with access via land in
the north of the playing field. There is good visibility to access the site from the London Road. The site could include dedicated parking which could reduce the need for parking on the A145 for village events. The site relates well to existing built form of the village and could accommodate 10-15 dwellings (including 3-5 affordable units) to be in keeping with local character. Play equipment on site would need to be relocated.

Two members of the public raised objections and concerns including:
- development would have an impact on the character of the village;
- site has no access;
- the land is water logged during the winter;
- there is limited public transport, few amenities in the village with nearest school and hospital located in Beccles;
- adverse impact on wildlife;
- impact of construction on Grade II listed building;
- odour from the sewerage treatment plant could affect new residents.

It was suggested the land on the north side of London Road to the rear of the Fox Public House which has permission for static caravans.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

Developing this site would be harmful to the setting of a listed building to the north west. This impact would be difficult to mitigate.

The site has no existing access. Access would need to be provided over the playing field to the west. There is existing pedestrian access.

Foul sewerage improvements would be needed to support development. A sewer pipe crosses the site and there is a low risk of encroachment on the water recycling centre.

The land is greenfield and well contained within the landscape. Development would not intrude into open countryside, but there is the risk of creating an exposed settlement edge.

Boundary hedgerows and a pond could provide habitats for wildlife and would be impacted if this site was developed.

The site is not considered to be suitable for development.

**Summary of Draft Sustainability Appraisal**
A significant negative effect was noted in relation to the impact on the setting of a Grade II listed building. Minor negative effects were associated with the impact on the landscape, the loss of undeveloped land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening, however the impact on the listed building cannot be mitigated. Existing hedgerows and trees should be protected and enhanced where possible. The site would need to be considered with site 134 to ensure access.

Conclusion

The site is located adjacent the existing built up area and is contained within the landscape by the built up areas to the north west and south east. The water recycling centre (within 400m) is located to the north and consideration will need to be given if this could affect a development. Located adjacent the site is the playing field (and basic play facilities) with the village hall and public house located on the opposite site of the busy A145. Access to these facilities would require a footway through the existing playing field. A listed building is located immediately to the west of the site and development is likely to cause substantial harm to is setting which would be difficult to mitigate. There is no access to the site from existing roads and the site can only come forward if an access road is provided through the playing field. For this reason this site is isolation cannot be brought forward. This site is not considered suitable for allocation as part of this Local Plan.
Site 94 - Land on the west side of London Road, Willingham

Suggested Use: Housing
Site Area: 1.17

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of listed buildings:
- Park Farmhouse to the west is Grade II listed;
- Shadingfield House to the south is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Sotterley Estate (landowner of alternative sites in the area but not site 94) suggested the site is located in an exposed location between Shadingfield and Willingham and would result in the coalescence of the two
villages. It was commented that site 94 does not offer the opportunities to improve community facilities that sites 38 and 134 offer.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. Low level electricity lines also cross the northern part of the site.

The land is greenfield and very exposed with limited screening.

The site has capacity to support approximately 23 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, the loss of greenfield land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located on the west of the A145 and would result in the extension of the settlement along the road network and away from the existing focal point of the village. Development of the site could result in the creation of a prominent settlement edge which would need to be mitigated by a quality landscaping and screening scheme. Other sites in the village are considered to be more preferable because they would be more contained within the landscape and relate better to the existing village. This site is not considered suitable for allocation as part of this Local Plan.
Site 101 - Land south of Hill Cottages, Shadingfield

Suggested Use: Housing  
Site Area: 0.41

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling centre.

Historic England stated there could be potential impact on the setting of listed buildings:
- Turnpike Farm to the west is Grade II* listed;
- The Service Range to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
The landowner, Sotterley Estate stated the site is suitable, available, achievable and viable. The village of Shadingfield shares services and facilities with Willingham (public house, meeting place, playing field, bus stop) which contribute towards its sustainability and it is important to consider the village as part of a wider network of settlements within the rural area. The village is located on the bus route between Beccles and Southwold and has good links to the A145. While it is suggested the site could accommodate 12 dwellings it is considered that 5 dwellings would be more appropriate with one of these being an affordable unit with the layout likely to be along the road.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. There is also a low risk of encroachment on the water recycling centre.

The land is greenfield. The site is contained to the north and south but exposed to the west. Development would lead to some landscape impact.

The site has capacity for approximately 5 new dwellings.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of open space, impact on the landscape, access to services, the loss of greenfield land and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the provision of new open space. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located along the A145 and has good access to the road network. There are no footways to connect the site to the village of Willingham St Mary or the limited bus service that is available. This lack of connectivity will have an adverse impact on people being able to access facilities in the village. The site is located near existing dwellings, however, this is a small cluster and is isolated from other settlement areas making it an unsustainable location. This site is not considered suitable for allocation as part of this Local Plan.
Site 134 - Playing Field, Off A145 London Road, Willingham

Suggested Use: Housing
Site Area: 1.21

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have an ‘Amber’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. There is a low risk of encroachment to the water recycling works and a pipe traverses the site.

Historic England stated there could be potential impact on the setting of a listed building:
- Fox Farmhouse to the north is Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.

Sotterley Estate recognised that development of the playing field and equipped play area would require replacement facilities to be provided. Sotterley Estate own adjoining land which could facilitate this along
with improving parking and road safety on the main road. The consultation document suggested the site could accommodate 36 dwellings but it is thought 20 dwellings including 6 affordable units would be more appropriate with a route through to the playing field and parking area. The Sustainability Appraisal states there would be a negative effect due to the loss of open space, however, the proposal is to replace the facility and is therefore incorrect. The combined assessment for site 134 with site 68 is correct and it is suggested that some open space along the A145 combined with improved pedestrian facilities would mitigate the loss of open space.

One member of the public commented that development of this scale would adversely affect the character of the village and infrastructure would need to be improved. The area is pleasant to live in but requires access to a private vehicle.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to support development. There is a low risk of encroachment on the water recycling centre and a sewer pipe crosses the site. Overhead power lines also traverse part of the site.

The land is greenfield. The current open space is a focal point of the village and it is advised that some should be retained to mitigate the loss of such space.

The site has capacity for approximately 20 new dwellings at 20 dwellings per hectare. Some land should be set aside for open space and access to playing fields.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of open space, the impact on the townscape, the loss of greenfield land, limited access to services and facilities and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the design and re-provision of open space. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is located within the existing settlement and is currently used as the playing field and equipped play area. The site is well contained within the landscape by the built up area and the A145, however, development of the site would result in the loss of community facilities. The site can be accessed from the A145 and Sotterley Road, however, the loss of playing fields would have an adverse impact on the
community and for this reason development of the site is not supported. Consideration of using part of the site could be considered with a limited amount of development enabling access to site 68 could be considered as another option, although the development of site 68 would cause substantial harm to the setting of a listed building.

This site is not considered suitable for allocation as part of this Local Plan.
Site 68 with Site 134 - Land North of Chartres Piece, Willingham

Suggested Use: Housing
Site Area: 0.64

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

See comments associated with sites 68 and 134 respectively.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

See the summarised assessments for each site.

Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, the loss of greenfield land and the impacts on sustainable movement patterns. There is a potential impact on a nearby Grade II listed building.
Minor positive effects were identified in relation to the provision of housing that could meet a local need, reducing anti-social behaviour and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape including screening, improving the quality of play provision and providing a crossing to connect the villages on either side of the A145.

**Conclusion**

Sites 68 and 134 are well contained within the landscape by the built up areas to the north west and south east. The water recycling centre (within 400m) has capacity and the foul water network requires improvement. There is good access to the road network to get to Beccles and a limited bus service is available. There is some potential for archaeological finds on the site.

The impact on the listed buildings north of site 68 is considered to be potentially significant therefore these sites (combined) are not considered suitable to be allocated for development in the Local Plan.
Site 220 - Land North of Sotterley Road, Willingham

Suggested Use: Housing
Site Area: 1.83

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site has been explored in addition to the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints or impacts that could not be mitigated. The site can be accessed from Sotterley Road. There is potential for archaeological finds on the site and a programme of archaeological work will be required through a planning condition.

The land is greenfield and a pond is located near the site to the east.

The site has capacity for approximately 30 dwellings (16 dwellings per hectare reflecting the recommendation of the landowner and the housing density and character of the nearby residential area).
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the impact on the landscape, loss of Grade 3 agricultural land, the impact on biodiversity, the impact on the historic environment and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services and facilities to improve health and well-being.

Mitigation measures could include the design of the scheme to be set within the landscape including screening. Existing hedgerows and trees should be protected and enhanced where possible. The footway will need to be extended to service the site.

Conclusion

Located on the edge of the existing built up area and would result in a small extension of the settlement into the open countryside creating a prominent settlement edge. There are no issues with infrastructure and the site has good access to the road network and a limited bus service to Beccles where services and facilities are available.

Compared to other sites in the village this provides an opportunity to provide new housing of a mix of tenures that will not significantly affect the character of the settlement. The site is an amendment of proposed site 59 with changes made to the site boundary to reduce potential impact on the landscape and reflecting existing field patterns better. This site has been allocated under Policy WLP7.20 of the First Draft Local Plan for 30 dwellings.
Wissett

Site 104 - Land south of The Street, Wissett

Suggested Use: Housing
Site Area: 1.77

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system. A sewer pipe traverses the site.

The Environment Agency stated that part of the site is located in flood zone 3.

Historic England stated the site is located in the Conservation Area and there could be significant impact on the Conservation Area and potential impact on the setting of listed buildings:

- Church of St Andrew to the west is Grade I listed;
- Whitehouse Farmhouse and barn located adjacent the site is Grade II listed.
Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.

Wissett Parish Council commented there was a need for new housing in the village but have concerns about the potential size of the development proposed. The scale development proposed is inappropriate and the increased population and traffic would adversely affect the village. There are listed buildings located on site. The only facility in the village is a public house. There is no public transport, few safe footpaths, limited lighting and no on-road parking. Halesworth provides local services and facilities (although the hospital is to be closed and there is no secondary school) but there are no footways to get there so a car is essential. Any new development should be small in scale and have adequate off-road parking, a play area and access to the site will need to be considered along with major road and footway improvements.

The Halesworth & Blyth Valley Partnership suggested that development of this scale would increase problems for sites 106, 140 and 141.

Three representations were made by members of the public with none supporting for the site. Objections and concerns were raised citing the following issues:

- the road through Wissett is narrow and requires improvement to accommodate additional development along with the provision of footways for the safety of children;
- there is no public transport;
- there will be an adverse impact on the character of the village.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from White House Farm (Mill Road) and The Street. Access is currently only possible for farm vehicles.

Foul sewerage improvements would be needed to support development and a sewer pipe traverses the site. Phone and electricity lines also cross the site and a transformer box is located in the north west corner.

The site is almost entirely with flood zone 3. Mitigating these flood risks would make the site more attractive to the market.

The site is within the Tributary Valley Farmland Character area. The Settlement Fringe Landscape Sensitivity Study indicates that this landscape area has a high sensitivity, a moderate value and a moderate capacity for new development. Limited development on part of this site would not have an excessive impact upon the landscape.

There is biodiversity potential in woodland hedges and the stream.
The site is part of the Wissett Conservation Area.

There is a risk of noise and odour from White House Farm.

A sequential test would need to be undertaken to determine if the site is suitable. If it is, the site has the capacity to accommodate 20 new dwellings if they pass the exceptions test.

Summary of Draft Sustainability Appraisal

Significant negative effects were associated with the impact on the landscape and the flood risk. Minor negative effects were associated with the loss of Grade 3 agricultural land, the impact on biodiversity and the impacts on sustainable movement patterns. There is a potential effect on local water quality due to the site proximity to a stream.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the heritage value of the listed buildings and Conservation Area and only locate dwellings in the small area lying outside the flood zone. Improve cycle access to Halesworth. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is within flood zone 3 and given there are other suitable sites elsewhere in the District which are not within a flood zone residential development is not considered acceptable. This site is not considered suitable for allocation as part of this Local Plan.
Site 173 - Street Field, Mill Road, Wissett

Suggested Use: Housing
Site Area: 1.74

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site is accessible from Mill Road. There could be issues with the junction at the street.

Telephone cables traverse the site.

Parts of the site are in flood risk zones 2 and 3. Mitigating this flood risk would make the site more attractive to the market.
The land is greenfield and is located within a Tributary Valley Farmland landscape character area. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having a high sensitivity, a moderate value and a moderate capacity for new development. The site is set within the landscape.

Wislett Conservation Area is located opposite along with several Grade II and locally listed buildings.

Development could support the local pub and farm shop and justify investment in an equipped play area.

A sequential test would have to be conducted to assess if the site would be suitable for development. If it is, the site could accommodate 26 new dwelling at 15 dwellings per hectare if the dwellings pass the exceptions test.

**Summary of Draft Sustainability Appraisal**

Significant negative effects were associated with part of the site being located within flood zone 3 and opposite a conservation area. Minor negative effects were associated with the impacts on healthcare, the loss of Grade 3 agricultural land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to services and facilities.

Mitigation measures could include the southern half of the site being developed as it is out of the flood zone. The front half could be used as public open space to improve the setting of the Conservation Area and provide an amenity not currently available. Alternatively the north half of the site could be used for parking to mitigate existing parking issues along The Street. Existing hedgerows and trees should be protected and enhanced where possible.

**Conclusion**

The site is located south of the village and opposite the Conservation Area. The site is not contained within the landscape and the northern part of the site is within flood zone 3. Housing could be delivered on the south part of the site however, this would have a poor relationship to the built up area of the village.

The site is not considered suitable for allocation in this Local Plan.
Site 200 - Corner of Rumburgh Road and Chediston Street, Wissett

Suggested Use: Housing
Site Area: 0.82

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated with no pedestrian access, making it unsuitable for development

The land is greenfield and is exposed to the open countryside.

The site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects are associated with access to services, the impact on the landscape, loss of Grade 3 agricultural land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the use of landscaping and screening to set the site within the wider landscape. Existing hedgerows should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 201 - Land opposite Box Farm, Wissett

Suggested Use: Housing
Site Area: 2.21

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site is isolated from the settlement with no pedestrian access making it unsuitable for development.

The south western part of the site is covered by a low, medium and high surface water flood risk.

The land is greenfield and classified as Grade 3 agricultural land. The site is located within a Tributary Valley Farmland landscape character area. The site is unrelated to any other development.

The site is not considered to be suitable for development.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects are associated with access to services, the impact on the landscape, the impacts of flooding, the loss of Grade 3 agricultural land and impact on biodiversity.

Minor positive effects were identified in relation to the provision of housing that could meet a local need.

Mitigation measures could include the use of landscaping and screening to set the site within the wider landscape. Existing hedgerows and trees should be protected and enhanced where possible.

Conclusion

The site is not located within or adjacent to a larger or smaller village in the rural area. The site is not considered suitable for allocation as part of this Local Plan.
Site 217 – Lodge Lane, Wissett

Suggested use: Housing
Site Area: 1.94

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

The site was submitted as part of the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

Development on this site would cause substantial harm to the setting of a Grade I listed church which would be very difficult to mitigate.

There is an area of flood risk found on site.

The site is located in the Tributary Valley Farmland character area and is reasonably contained within the landscape.

This site is not considered to be suitable for development.
**Summary of Draft Sustainability Appraisal**

A significant negative effect was associated with the impact to the listed church. Minor negative effects were associated with the lack of services, the impact on the landscape, the loss of greenfield land, the impact on biodiversity and the impacts on sustainable movement patterns.

Minor positive effects were associated with the provision of homes to meet local needs. Planting and screening may help mitigate the effects to the landscape and biodiversity, however the impact to the listed building would be difficult to mitigate.

**Conclusion**

The site is located south of the village and opposite the Conservation Area. The site is not contained within the landscape and the northern part of the site is within flood zone 3. Housing could be delivered on the south part of the site, however, this would likely cause substantial harm to the setting of the listed church.

The site is not considered suitable for allocation in this Local Plan.
Wrentham

Site 67 - Land west of Chatten Close, Wrentham

Suggested Use: Housing
Site Area: 1.13

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on a listed building:
- United Reform Church nearby is Grade II* listed.

Suffolk County Council Archaeology noted that development of this site would have an ‘Amber/Green’ impact.
Wrentham Parish Council raised concerns about density, infrastructure, recreation space, traffic and parking. These should be taken into account as part of any planning application.

The landowner, Benacre Estates Company stated the site could accommodate approximately 30 dwellings at 30 dwellings per hectare. The site is available and could be delivered in the next five years. The site is a logical extension to the village being located next to existing residential development. The site is not subject or any landscape or flood risk constraints.

One member of the public supported the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Foul sewerage improvements would be needed to accommodate development.

The land is greenfield. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a moderate capacity to support development. The site relates well to the existing residential development but is exposed to the north.

The site has capacity for approximately 17 new dwellings at 15 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land, the impact on biodiversity and limited access to sustainable travel.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities. There could be an effect on the landscape relating to the fact that the site relates well to the existing built settlement.

Mitigation measures could include the design of the scheme to be set within the landscape and reflect the heritage value of the listed buildings. Existing hedgerows should be protected and enhanced where possible. Improve connectivity for cyclists to Reydon to access employment.

**Conclusion**

The site is in keeping with the existing form of the built up area and impact on the wider landscape is not considered to be significantly adverse. There is potential for the existing settlement edge to become increasingly prominent as the site overlooks the valley, however, a quality landscaping scheme should be included as part of any planning application to mitigate this impact. The landscaping scheme should link
into the existing shrubs and trees along the settlement edge to enhance the green infrastructure network. The site does not lie within the catchment of any equipped play area, therefore an equipped play area should be provided as part of any development on the site.

This site has been allocated with site 215 as Policy WLP7.9 of the First Draft Local Plan for 60 dwellings and open space.
Site 120 - Land west of London Road, Wrentham

Suggested Use: Housing
Site Area: 1.11

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

Anglian Water stated that development of the site would have a ‘Green’ impact on the water recycling centre capacity and an ‘Amber’ impact on the foul sewerage network. Anglian Water stated that surface water should be dealt with through a sustainable drainage system.

Historic England stated there could be potential impact on the setting of listed buildings:
- County Primary School and walling nearby are Grade II listed;
- Clyfton House nearby is Grade II listed;
- numbers 30-32 London road are Grade II listed.

Suffolk County Council Archaeology noted that development of this site would have a ‘Green/Amber’ impact.
Wrentham Parish Council raised concerns about density, infrastructure, recreation space, traffic and parking. These should be taken into account as part of any planning application.

The landowner, Benacre Estates Company stated the site is enclosed by residential development and is not constrained by any landscape or flood risk designations. Access would come from the A12. The site is available and could be delivered in the next five years.

One member of the public supported the site.

**Summary of Draft Strategic Housing and Economic Land Availability Assessment**

The assessment did not identify any constraints that could not be mitigated. Access to the site comes from the A12.

Foul sewerage improvements would be needed to support development.

The land is greenfield and classified as Grade 3 agricultural land. The site is located within a Tributary Valley Farmland landscape character area. At a strategic level the Settlement Fringe Study suggests this site is in an area of moderate landscape sensitivity and has a moderate capacity to support development. The site is contained within the wider area. The play area adjacent to the site is poorly overlooked.

The site has capacity for approximately 22 new dwellings at 20 dwellings per hectare.

**Summary of Draft Sustainability Appraisal**

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land and the loss of biodiversity.

Minor positive effects were identified in relation to the provision of housing that could meet a local need, access to a limited number of services and facilities and the impact on the landscape.

Mitigation measures could include the design of the scheme to be set within the landscape and reduce the impact of the A12 on amenity. Existing hedgerows and trees should be protected and enhanced where possible. To improve the value of the equipped play space new residential properties should provide a frontage to increase natural surveillance and integrate the existing play space into the surrounding area.

**Conclusion**

The site is located at the south west end of the settlement. The site is in keeping with the existing form of the built up area and likely the impact on the wider landscape is not considered to be significant. The site is adjacent to the equipped play space at the end of Bonsey Gardens, however, this is isolated from the
surrounding area and has poor natural surveillance. Any scheme design will enable properties to have a street frontage onto this open space.

This site has been allocated under Policy WLP7.10 of the First Draft Local Plan for 22 dwellings (20 dwellings per hectare).
Site 213 – Land east of London Road, Wrentham

Suggested Use: Housing
Site Area: 2.70

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site has been explored in addition to the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The site can be accessed from the A12 (London Road).

The land is greenfield and the eastern boundary of the site lies within flood zones 2 and 3a. The area in the flood zone is approximately 0.5ha.

The site has capacity for approximately 50 dwellings (23 dwellings per hectare reflecting the housing density and character of the nearby residential area).
Summary of Draft Sustainability Appraisal

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities.

The site is located in an area with low landscape sensitivity and which suggests a high capacity to support new development, however, the south boundary of the site is considered to have a sensitive settlement edge. The site lies within an area classified as Tributary Valley Farmland in the Landscape Character Assessment.

There is potential for minor adverse impacts on heritage assets with the Wrentham Conservation Area located north of the site and a Grade II listed building located adjacent on the west boundary. There are views when approaching the village from the south and a scheme would need to be designed to provide a quality frontage.

The land is greenfield and classified as Grade 3 agricultural land. There is potential for archaeology on the site but there are no areas identified on the Historical Environmental Record that might affect the site.

Minor negative effects are associated with the impact on the landscape, loss of Grade 3 agricultural land and climate change.

Mitigation measures could include a scheme design and landscaping to protect the setting of the listed building. Screening through planting of hedges and hedgerows trees should be planted along the southern boundary to reduce impact on the wider landscape and avoid creating an exposed settlement edge. The southern boundary of the site should have a soft frontage as this will be very exposed to the south and with views from the A12 and the Grade II listed building. A road access along the southern boundary of the site with dwellings facing onto it from the north and planting along the south side of this access could help mitigate the impact on the landscape and townscape. The land immediately to the south of the listed building should not be developed to reduce potential impact on the heritage asset. Existing hedgerows should be protected and enhanced where possible. The site lies outside of the catchment area of the equipped play space located at Bonsey Gardens and the A12 acts as an additional barrier. Therefore an equipped paly area should be provided on site accompanied with some amenity green space to support informal activities.

Conclusion

The site is exposed to the south with views from the A12 contributing towards the setting of the village and there is a listed building adjacent to the west with an outlook across the valley. Development could potentially impact upon the setting of listed buildings.

The site is not considered suitable for allocation as part of this Local Plan.
Site 215 – Land north of Chapel Road, Wrentham

Suggested Use: Housing
Site Area: 3.30

Summary of Response from ‘Options for the new Waveney Local Plan’ Consultation

This site has been explored in addition to the ‘Options for the new Waveney Local Plan’ Consultation.

Summary of Draft Strategic Housing and Economic Land Availability Assessment

The assessment did not identify any constraints that could not be mitigated. The site can be accessed from Chapel Road via if site 67 comes forward.

The land is greenfield. The Settlement Fringe Landscape Sensitivity Study identifies this landscape area as having moderate sensitivity, a moderate value and making a limited contribution to the setting of the Suffolk Coast and Heaths AONB. As a result the landscape area is identified as having a moderate capacity for new development. The site slopes down towards the Priory Road to the north.

The site has capacity for approximately 72 new dwellings at 15 dwellings per hectare.
Summary of Draft Sustainability Appraisal

The Sustainability Appraisal did not identify any significant effects. Minor negative effects were associated with the loss of Grade 3 agricultural land and the impact on sustainable movement patterns.

Minor positive effects were identified in relation to the provision of housing that could meet a local need and access to a limited number of services and facilities. There is a potential impact on the landscape.

Design needs to reflect the sensitivities related to listed buildings and open countryside. Footways required to connect into the existing network to access the village and public transport.

Conclusion

The site is located to the west of the village and is connected to the facilities by public footway along Chapel Road. The site can be accessed from site 67 to the south from Chapel Road and this connects into the strategic road network to Lowestoft and Ipswich.

The site is reasonably contained within the built up area but the exposed settlement edge that would be created along the western flank would need to be softened through landscaping and planting. A scheme designed so a street frontage allowed properties to face out to the west with tree planting along the west side of this access would help protect the setting of the village and views from the church located west of the site.

This site has been allocated as a ‘preferred option’ in conjunction with site 67 as Policy WLP7.9 of the First Draft Local Plan for further consultation for a combined 60 dwellings and open space.
Appendix 2 Analysis of Responses to First Draft Plan (2017) Consultation

This section of the document identifies how comments raised during the First Draft Plan Consultation (2017) were taken into account in the Regulation 19 Publication version of the Local Plan. Comments are split down by the main sections of the plan. Full responses to each individual comment will be published on the Council’s website.

Waveney Context

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Waveney Context

Statutory Consultees

The Broads Authority stated that the river is navigable near to Bungay which might be of relevance to accessibility to this paragraph.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

**How these comments have been taken into account in the Final Draft Local Plan**

No changes are considered necessary as this part of the Plan.

**District-wide Key Issues**

**Society Key Issues**

**Statutory Consultees**

No comments were made in response to this section/policy.

**Parish and Town Councils**

Southwold Town Council welcomed the identification of high house prices throughout Waveney and the impact of this on affordability. The Town Council stated that a significant driver of high house prices is the District’s attractiveness as a second home destination, which is not referred to the in Plan, and is not just an issue for Southwold.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

A respondent stated that house prices are lowest in Lowestoft as the town is not seen as a particularly attractive place to live.

It was suggested that there is a lack of aspiration both at Council level and amongst a large proportion of the population.
It was suggested that rather than emphasising growth, and increasing demands on services, improvements should be made to what already exists such as health services and education.

It was questioned whether there is a good sense of community.

It was suggested that policies of austerity has acerbated all these factors.

It was questioned how the extra 13,000 extra residents have been calculated and has allowance been made after Brexit.

It was questioned why households are expected to decrease in size as with high house prices, more children are staying at home longer meaning that households could increase in size.

Respondents stated that health issues are related to poor diet.

How these comments have been taken into account in the Final Draft Local Plan

No changes are considered necessary as a result of the comments.
The attractiveness of the District as a tourist destination is acknowledged in the Economy Key Issues, and higher house prices in Southwold is also a reflection of second home ownership in the town.

Lower house prices in Lowestoft are not considered an issue and the main issues affecting Lowestoft have been identified in the Lowestoft context section.

The population increase has been amended to reflect the findings of the Waveney Strategic Housing Market Assessment and Objectively Assessed Housing Need Study.

Household sizes are based on trends produced by the Office for National Statistics and there is no reason to assume these are incorrect.

The main issue for health is the lack of physical activity as referenced in the Sustainability Appraisal Report (Social Baseline, Health).

Environment Key Issues

Statutory Consultees

The Broads Authority stated that the Broads is also equivalent to a National Park.
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

The Waveney River Trust welcomed recognition of decreasing water quality as one of four key environmental issues and 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.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

A respondent was concerned that the statement that water quality in rivers is decreasing mainly due to run off from arable land is inaccurate and does not reflect mitigating actions by farmers.

It was suggested that Grade 1 and 2 agricultural land is identified on the policies map so that it can be protected.

Support was given for the positive statements in this section, however, it was questioned why the Broads is singled for protection from damaging development.

How these comments have been taken into account in the Final Draft Local Plan

No changes are considered necessary as a result of the comments.

It is not considered necessary to reference the Broads as equivalent to a National Park in this section as it is mentioned elsewhere in the Local Plan.

Water quality is discussed in the Sustainability Appraisal (Environment Baseline, Air and Water Quality).

Agricultural land grade maps are published by Natural England and it is not considered necessary to identify these on the Policies Map particularly as they are produced at a scale which is incompatible with the Policies Map.
Economy Key Issues

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
A respondent stated that offshore tidal power generators are close to becoming commercially viable and the Council should be looking to attract these companies to the Inner Harbour for their assembly facilities.

A respondent stated that the issue of declining job opportunities needs to be addressed.

A member of the public stated that the infographic on Lowestoft vacancy rates is not very informative.

A respondent provided suggestions to help the local economy: a reduction in business rates; improvements to broadband speeds; improvements to access and parking in Lowestoft and a shopping mall; and the offer of free all day parking in car parks close to the main retail areas.

How these comments have been taken into account in the Final Draft Local Plan

The Lowestoft vacancy rate infographic has been re-written and further information on town centres is contained in the Sustainability Appraisal (Economy Baseline, Town Centre Vitality and Viability).

The offshore renewable energy infographic uses a wind turbine image but does not exclude other types of renewable energy.
Key Issues in Lowestoft, Carlton Colville, Oulton and Oulton Broad

Statutory Consultees

Suffolk County Council suggested additional references to highlight further historic distinctiveness would enhance the text.

Historic England stated that the identification and use of the historic environment and its issues could be improved and would expect more detail on the historic environment, in particular, the issues facing the historic High Street and Scores.

The Environment Agency welcomed the recognition of the importance of protected landscapes and habitats around Lowestoft and the risk posed to these through development and also flooding as a major issue for parts of Lowestoft.

The Broads Authority stated that the Broads is not a National Park for planning purposes. It has status equivalent to a National Park.

Parish and Town Councils

Lowestoft Town Council stated that there is no mention of medical assets/resources, the disparity in available services in the north and south of the town, and supports a full 24/7 minor emergency clinic in Lowestoft.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Bourne Leisure Ltd supported the Council’s commitment to protecting key assets of the District with the delivery of strategic flood protection measures. However it is also suggested that the Council should seek to ensure that smaller settlements such as Corton and other seaside locations are also protected.

R G Meadows & Son noted the issues of the large catchment area and location of Carlton Colville Primary School being some distance from the main built up area resulting in congestion on local roads. It is considered that the allocation of site WLP2.15 (Land South of The Street, Carlton Colville/Gisleham) can help address this issue.
Members of the Public

Concern was expressed about developing greenfield sites when there are sufficient areas of brownfield land which could be redeveloped and several sites with planning permission for housing are not being developed.

Concern was expressed about the condition of the High Street and Scores.

It was suggested that the third crossing and flood protection measures should be completed before more housing puts increased pressure on the current infrastructure.

A respondent expressed concern that development at North Quay and Zephyr Cams will not help the town centre and the third crossing could mean that casual traffic will bypass the town.

Concern was expressed that the East of England Park will be a waste and the resources should be used to develop the town centre.

How these comments have been taken into account in the Final Draft Local Plan

The text has been updated to include the Heritage Action Zone status for the High Street and Scores.

Health infrastructure needs have been identified elsewhere in the Local Plan.

Coastal protection has been identified as a district wide key issue.

The allocation of Land South of The Street, Carlton Colville/Gisleham (Policy WLP2.16) will address the issue of Carlton Colville Primary School being some distance from the built up area.

Key Issues in Beccles and Worlingham

Statutory Consultees

Suffolk County Council suggested additional references to highlight further historic distinctiveness would enhance the text.

Historic England stated that the identification and use of the historic environment and its issues could be improved and would expect more detail on the historic environment.

South Norfolk District Council requested that 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.
SNDC stated that it is interesting to note the level of out-commuting to other districts, including South Norfolk.

**Parish and Town Councils**

No comments were made in response to this section/policy.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

No comments were made in response to this section/policy.

**How these comments have been taken into account in the Final Draft Local Plan**

Reference to the Grade I St Michael’s Church and adjacent Bell Tower has been made.

The text has been amended to acknowledge that the town acts as a service centre for communities within both Waveney and South Norfolk.

**Key Issues in Bungay**

**Statutory Consultees**

Suffolk County Council suggested additional references to highlight further historic distinctiveness would enhance the text.

South Norfolk District Council supported 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.
SNDC stated that it is interesting to note the level of out-commuting to other districts, including South Norfolk.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

A respondent stated that the proximity of the Broads is not sufficiently emphasised.

How these comments have been taken into account in the Final Draft Local Plan

No changes are considered necessary to this section.

The proximity of the Broads is sufficiently referenced in the Local Plan.

Key Issues in Halesworth and Holton

Statutory Consultees

Suffolk County Council suggested additional references to highlight further historic distinctiveness would enhance the text.

Historic England stated that the identification and use of the historic environment and its issues could be improved. Halesworth and Holton are noticeable from the absence of reference to the historic environment.

Parish and Town Councils

No comments were made in response to this section/policy.
Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

A respondent suggested that self-containment is not necessarily good.

Respondents stated that a secondary school is needed if the town is to grow and attract younger families.

Concern was expressed about proposals for a new supermarket which could impact on the town centre.

A respondent stated that there is not much distinction between Holton and Halesworth therefore seeking to preserve a separation between the two settlements is unnecessary.

How these comments have been taken into account in the Final Draft Local Plan

Reference has been made to the town’s historic environment.

A reasonable amount of self-containment is good for sustainable development.

As education authority, Suffolk County Council is not currently proposing to provide a secondary school in the town.

There is currently no allocation or planning permission for a supermarket out of the town centre.

The Council considers there is a distinction in identity between Halesworth and Holton and undeveloped land between the two contributes to these separate identities.

Key Issues in Southwold and Reydon

Statutory Consultees

Suffolk County Council suggested additional references to highlight further historic distinctiveness would enhance the text.
Historic England stated that the identification and use of the historic environment and its issues could be improved and would expect more detail on the historic environment.

**Parish and Town Councils**

Southwold Town Council stated that the population figures presented are inaccurate as they rely on 2011 census data.

The Town Council referenced the Southwold Coastal Community Team Economic Plan and sustainability issues identified.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

Respondents were concerned about the number of holiday homes in the town and local people are being priced out.

Concern was expressed about the number of national retailers in the town.

**How these comments have been taken into account in the Final Draft Local Plan**

No changes are considered necessary to this section.

The 2011 Census data is the latest available data and no change to the text is considered necessary.

The sustainability issues identified by the Southwold Coastal Community Team’s Economic Plan identified in this section with the exception of business rates which cannot be influenced within the plan making process.

The Council considers the town centre is vibrant and with low vacancy rates.
Key Issues in Rural Areas

Statutory Consultees

Historic England stated that the identification and use of the historic environment and its issues could be improved and would expect more detail on the historic environment.

South Norfolk District Council supported the importance of broadband for economic development in rural areas and expressed a desire to work with Waveney District to improve broadband speeds in rural areas.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Bourne Leisure Ltd stated that the section does not recognise the employment contribution from established tourism facilities.

The Benacre Estates Company supported the identification of Wrentham as one of the District’s largest villages with a reasonable provision of everyday services and facilities and therefore the allocation of housing sites in the village.

Members of the Public

Concern was expressed that the proposed sites in the villages are inconsistent with sustainability objectives, that with little or no facilities any social benefit in expanding village populations is countered by the additional number of private vehicle journeys resulting from the development.

A respondent stated that in addition to access to fast broadband, mobile phone reception is also important.

How these comments have been taken into account in the Final Draft Local Plan

Heritage assets are now referenced in this section.
Reference to tourism jobs has been made.

The Local Plan acknowledges that development in the villages, particularly the smaller villages, will increase private travel for school, work and recreation.

Reference to mobile phone reception has been made.
Overall Spatial Strategy

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Vision

Statutory Consultees

The Broads Authority states that the Broads is not a National Park for planning purposes. It has a status equivalent to a National Park.

The Environment Agency generally agree with the vision and welcome the desire to protect landscapes and the reference to flooding and coastal change. They indicated they would like to see reference to maintaining and improving water quality rather than just maintaining.

Historic England recommended amendments to the forth paragraph of the vision to add in the words historic environment and to include some illustrative examples of heritage assets. They questioned why the historic High Street was not mentioned in the vision for Lowestoft. Historic England welcomed the commitment to maintaining the two separate identities of Beccles and Worlingham. They question why the historic environment did not form part of the vision for Beccles and Worlingham and Bungay. They supported the vision to retain open areas within Bungay and the identification of the historic centre of Halesworth and Southwold as a historic town. They added it was unclear what role the historic environment has in the proposals for Halesworth to become a more significant service centre. They also suggested adding reference to historic environment in the final sentence of the Southwold and Reydon strategy. They would welcome further clarification on how the proposed growth will work with the historic character of the rural settlements.

South Norfolk Council were 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 supported the structure of the vision, with a general section and then more detailed visions for individual settlements.
Suffolk County Council (draft) suggested 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.
- 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’.

Parish and Town Councils

No comments were made in response to this question.

Other Organisations

No comments were made in response to this question.

Developers/Landowners

Benacre Estates Company support the vision. Specific support was given to meeting housing needs and growth in the rural areas.

Bourne Leisure Ltd. Support the vision’s reference to tourism. They added that the statements in the vision align with national planning policy. They also supported the use of the employment land needs evidence to support the local plan.

Forecore Ltd. objected to the vision as they did not believe the strategy would be delivered based on the sites allocated in the plan.

Larkfleet Homes welcome the aspirational nature of the plan’s vision but note that the approach to housing growth is more guarded. They suggested that the approach to housing growth should also be aspirational. They noted concerns around lack of homes 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. They noted that issues of unemployment and low wages and that the vision should seek to support substantial housing growth to encourage future economic prosperity. With regard to Beccles, they suggested the aspiration must be to maintain the vitality and character of the town and increase the provision of all types of housing including starter homes, bungalows and retirement community. They noted the lack of community facilities such as healthcare, community centre, primary schools, bus services, local shops and greenspace. They stated that the vision should seek to address these issues. With respect to the vision for Beccles and Worlingham noted in the plan they stated that the aspiration that the separate identities of the two settlements will also have been preserved” was
misconceived. They noted that the specific circumstances of Beccles and Worlingham are such that there is nothing in the way of physical distinction between the two settlements. They added that the two settlements form part of a continuous urban area having coalesced many years previously.

M J Edwards & Partners objected to the statement that Lowestoft will accommodate the majority of the District’s growth. They raised concern that the Council is over-relying on the delivery of large-scale development. They indicated that these sites are slow to deliver and that infrastructure would need to be improved. However, they supported the vision in respect of the rural areas.

Northland (Reydon) ltd. Stated they had no fundamental objection to the spatial strategy.

Richborough Estates Ltd supported the vision with particular regard to Halesworth.

R G Meadows & Son support the vision and consider it aspirational yet realistic. Specific support was given to meeting housing needs and growth in Lowestoft.

The Somerleyton Estate support the vision for the rural areas because it recognises the need to facilitate higher levels of growth in rural areas.

The Sotterley Estate support the vision for the rural areas because it recognises the need to facilitate higher levels of growth in rural areas.

St Johns Hall Farms stated that the vision should include reference to new retail facilities in Bungay. They raised an issue that housing growth in the vision for Bungay is referred to as ‘modest’, whereas in the Key Diagram it states ‘reasonable’. They stated the vision should state ‘reasonable’.

Warnes and Sons Ltd objected to the vision as they did not believe the strategy would be delivered based on the sites allocated in the plan.

G Youlden objected to the vision as they did not believe the strategy would be delivered based on the sites allocated in the plan.

Members of the Public

Members of the public raised a number of issues with the vision as summarised below:

- Development proposed for Halesworth poses threats for the natural environment and there is limited reference to retention of trees, hedgerows and wildlife habitats.
- Concern raised that the vision is extremely optimistic and based on best scenario hopes.
- Suggestion that more housing should be allocated to Lowestoft and less to Beccles and Worlingham. It was suggested that Lowestoft has economic potential, with offshore sector.
It was suggested that Beccles is a self-sufficient market town which does not need additional population.

- Concern raised that the vision for rural areas did not apply to Mutford, which already lacks services and facilities and that development in Mutford should be in the form of larger properties.
- Concern was raised that permitting development on the St. Felix School site in Reydon was contrary to the vision for that area.
- It was questioned why there was additional need for retail development in Halesworth.
- Concern was raised about the lack of reference to brownfield sites.

How these comments have been taken into account in the Final Draft Local Plan

Reference to improving water quality has been added to the Vision.

Reference to the historic environment has been added in to the Vision, although it is not considered necessary to include illustrative examples in the District wide section. It is not considered necessary to refer to the historic environment in the Beccles and Worlgham and Bungay sections of the Vision as none of the proposals in the plan directly relate to the historic environment of these locations. However, it is considered necessary for Southwold.

The Broads is branded as a National Park, given the context of the Vision is thought more appropriate to refer to it as the Broads National Park.

The Vision is considered to be deliverable based on the sites allocated in the plan.

The Vision is considered sufficiently aspirational with respect to new housing development in that it envisages there to be sufficient housing of the right types and tenures to meet the needs of the population and people moving to the District.

It is considered that whilst the built-up areas Beccles and Worlingham have merged in to one there is open land to the north of Lowestoft Road which is worthy of protection as it provides a visual break between the two settlements which helps reinforce historic separate identities.

It is not considered necessary to reference new retail facilities in Bungay. There is limited need for new retail development in the District and it is considered more appropriate to focus this in the town centres of Lowestoft, followed by Beccles and as local shopping centres on larger sites allocated in Lowestoft and Beccles.

Unfortunately it is not possible to meet the needs of development on brownfield sites. The rural area is made up of a diverse set of villages and not every aspect of the vision will apply to every village.
It is considered that the overall distribution of development across the District provides a suitable and sustainable balance. No evidence has been presented to suggest the overall distribution set out in the Local Plan is unsound.

Objectives

Statutory Consultees

Historic England stated that they welcomed the principle of objectives 3, 5 and 7 but stated as drafted they do not form part of a positive strategy for the historic environment. They stated that as a minimum objective 3 should be amended to include reference to historic environment. They also suggested that the objectives could be more locally specific.

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

Parish and Town Councils

No comments were made in response to this question.

Other Organisations

Making Waves Together suggested a stronger reference to culture, arts and heritage in the context of growth, urban design, health and wellbeing should be accommodated in the objectives.

Developers/Landowners

Bourne Leisure Ltd. suggested that an additional objective for tourism is included to ensure that there is a clear framework for tourism development in Waveney working towards achieving the Vision. They suggested “9. To support growth in the tourism industry through increases in visitor numbers and overnight stays in the District.”

The Somerleyton Estate supported objectives 2 and 6 which support development in villages.

The Sotterley Estate supported objectives 2 and 6 which support development in villages.
Members of the Public

Concern was raised against objective five questioning whether economic growth can be sustainable and whether it is appropriate to continue planning for growth with finite resources and a degrading environment.

It was questioned why objectives relating to health, well-being and education are included when land-use planning can only indirectly achieve them.

It was questioned how the site proposed to be allocated under draft Policy WLP3.1 would help meet objectives relating to the health of the population and the environment.

How these comments have been taken into account in the Final Draft Local Plan

Reference has been made to the historic environment in Objective 3.

A new objective has been added with respect to culture.

A new objective has been added with respect to tourism.

It is considered that the objectives when read in the context of the vision are locally specific.

Within the definition of sustainable development as set out by the National Planning Policy Framework, it is considered possible for economic growth in the District to be sustainable.

Many of the positive effects of town and country planning are indirectly achieved.

All of the policies and proposals in the Local Plan will help deliver the objectives of the plan.

Policy WLP1.1 Scale and Location of Growth

Statutory Consultees

The Broads Authority questioned whether the objectively assessed need includes or excludes the Broads Authority objectively assessed need number.

Great Yarmouth Borough Council stated that objectively assessed needs which is a cross-boundary strategic matter had been adequately addressed.

Historic England welcomed that the Council had undertaken a Settlement Fringe Landscape Sensitivity Study but raised concern that the individual site allocations did not concur with some of
the findings. They also raised concern that some of the allocations did not take into account the historic environment.

South Norfolk Council were 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. With respect to need for care homes, they suggested that more could be done to express how this need will be met. South Norfolk were also pleased to see that sufficient employment allocations had been made to meet slight more than what is needed. They stated that 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. South Norfolk supported the overall distribution of growth, particularly the level of growth for Beccles and Worlingham and Bungay. They added a need for continuing close working between the Council and 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.

Suffolk County Council (draft) stated that the distribution of homes and jobs, focussing on Lowestoft and the larger settlements, appears appropriate in respect of coordinating the distribution of new homes and new employment. They indicated that modelling evidence supporting the Local Plan indicates that development will create additional delays. They stated that the 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. They noted that a number of junctions in South Lowestoft would be congested if mitigation was not provided. They noted Bloodmoor Roundabout in particular. They noted 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.

**Parish and Town Councils**

Barnby Parish Council questioned the number of homes required as they stated there were 11,000 empty homes at present in the area.

Beccles Town Council reluctantly accepted the proposed number of dwellings. They argued that policies should be strengthened ensure that the proper infrastructure is in place to support this demand. They added that Beccles is already suffering from a lack of infrastructure and that in terms of leisure facilities there should be a greater than 15% increase in provision.

Lowestoft Town Council stated that the Local Plan should prioritise large scale leisure facilities and convention space that will benefit both sectors (retail/leisure). A modern multiplex 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. The Town Council also identified the following gaps in Lowestoft Town Centre:

- Non-food retailing
- Higher-end retailers
- Limited capacity for food stores
- Additional department store
- Need to integrate High Street and London Road North shopping areas
- Multiple cinema
- Market stalls in Triangle Market
- Business rates system based on takings rather than rateable value.

In relation to jobs growth, the town council stated that the town will continue to need large scale office space in the PowerPark, London Road North and the High Street area. They stated that the plan should prioritise these uses above housing in these areas. With respect to housing for the elderly they suggested the need for additional care home spaces was under-estimated and that there was a need for 900-1000 spaces in Lowestoft alone. The Town Council raised concern that there was insufficient clarity as to where the new housing in Lowestoft was to be delivered. They suggested that the majority of housing in Lowestoft would need to be accommodated in surrounding parishes. They supported the use of brownfield site within the town as long as wider issues are not ignored such as 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.

Other Organisations

The Beccles Society noted that the economic, housing and retail projections could be affected by Brexit, nevertheless they accepted the calculations as they stand. They raised concerns that the over-allocation of housing seemed unreasonable in relation to Beccles. They added that this would only add to the burden of infrastructure problems in Beccles. The Society approve of and support the Garden Village principle of development and would look for strict adherence to this concept at each future stage.

The Education and Skills Funding Agency stated that the growth proposed will place significant pressure on social infrastructure such as education facilities.

The Southwold and Reydon Society stated that the 9,019 new homes being planned should be an absolute upper limit. They added 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.
Developers/Landowners

Badger Building welcomed the wider spread of housing and the additional allocations. However, they had concerns about the deliverability of some existing allocation and the effect this would have on the availability of new dwellings in the town. They suggested that 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.

Benacre Estates Company supported the approach to housing provision. In particular they supported the level of growth proposed to rural villages. They added that societal changes have affected the sustainability credentials of many of the smaller settlements with the use of the internet allowing for home-working and internet shopping.

Christchurch Land and Estates (Halesworth) Ltd. supported the level of development proposed for Halesworth and Holton and considered it commensurate with the level of services and facilities and public transport connections the town has to offer.

Gladman Developments consider it is essential for Local Plans to provide flexibility by identifying land for the delivery of housing that is 20% above the minimum requirement. They added that evidence from DCLG indicated that 10-20% of permissions do not materialise into a start on site. They added a 20% contingency is also required or circumstances where large scale strategic sites do not deliver housing at the rate that is initially anticipated. They added that large sites should be supplemented by a range of smaller and medium sized sites. They expressed a need for a wide variety of sites in a wide variety of locations to meet all types of demand.

The Home Builders Federation stated they would welcome clarification in future iterations of the plan that the housing shortfall will be delivered in the first five years. They raised concern that the Council has not applied a lapse rate to existing planning permissions. They added that due to the marginal five year supply the Council may wish to consider allocating smaller sites to boost delivery. The Home Builders Federation noted the recent consultation on standardised housing needs. They suggested at present the Council should give limited weight to it but ensures that its assessment keeps up to date with national planning policy. The Federation also suggested that the housing requirement for the District should be increased to take into account the high need for affordable housing.

Hopkins Homes object to the scale and location of growth strategy. They consider that 55% of growth directed to Lowestoft to be overly optimistic, unrealistic and undeliverable during the plan period. They argue that 12% of growth to the rural areas would create an unsustainable pattern of development which would promote a reliance on the private car and impact on the character of the rural area. They argue that the plan fails to allocate enough development to Halesworth and Holton at just 8%.
Larkfleet Homes raised concern with the Strategic Housing Market Assessment and the overall level of growth planned in the District. They stated that the housing market area for Waveney is not justified and it should be included within a housing market area with Great Yarmouth. They stated that the latest 2016 mid year estimates for population should be considered in the Strategic Housing Market Assessment. They added that a 10 year trend would be better than a five year trend as the five year trend is focussed on a recessionary period which Waveney is yet to recover from. They added that the decision to not make adjustments to household formation rates is not at all clearly set out within the main report. They argued that it was not reasonable to not include market signals uplift. Larkfleet welcomes the Council’s strategy which sees a proportion of growth going to the market towns and rural areas. However, they argue for a greater proportion going to these areas. They note the positive benefits identified in the Council’s Sustainability Appraisal about greater levels of development being focussed in Beccles.

M J Edwards and Partners stated that in order to meet the objectively assessed needs for affordable housing at 208 homes per year, the Council must allocate a higher number of homes overall. They added that in order to deliver 55% of housing need in Lowestoft a higher portion of small to medium sized sites would be required. They noted that it was unclear on the status of Corton and whether it is considered in the 55% Lowestoft allocation or the 12% rural allocation.

R G Meadows & Son supported the approach to housing provision, particularly the identification that targets are minimums. It was suggested that given the increasing offshore wind sector that the Council should allow for provision of future growth in this sector. It was noted that the acute affordable housing shortage should justify a further uplift in the total number of homes being planned for.

S Read agreed with the vision and strategy for the rural area and the overall level of growth and the level of growth for the rural area.

Richborough Estates Ltd. supported the vision, the level of growth and the location of growth. They raised the recent consultation on the standardised methodology for assessing housing needs and that the Council will need to take this into account. They raised some concerns about the amount of development focussed in Lowestoft and raised concerns about the deliverability of brownfield sites in the town and the proposed North Lowestoft Garden Village. They added that as Halesworth serves villages within Suffolk Coastal, Halesworth could assist in addressing deficiencies within Suffolk Coastal District. They therefore suggest that further development could be allocated to Halesworth.

The Somerleyton Estate supported the location of growth strategy.
The Sotterley Estate supported the location of growth strategy, with particular reference to the rural strategy.

Statuslist Ltd. supported the strategy in WLP1.1. They added that the strategy of focussing 55% of development in Lowestoft would help facilitate regeneration of central, brownfield areas of the town. Statuslist stated that the Council may need to consider a further uplift to overall levels of housing required to take into account the high need for affordable housing. They also raised concern about the Council’s five year supply given issues with delivery on some sites within central Lowestoft.

St Johns Hall Farms stated that Bungay should accommodate around 8% of the District’s growth. They consider this to be a ‘reasonable’ level of growth in line with the Key Diagram. They stated there is a need to identify strategic reserve sites in case the allocated sites and windfall sites in the town do not meet the targets. They added 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. They stated the plan needs flexibility to help meet affordable housing needs. In terms of retail, they stated that as Bungay is one of the main market towns the Local Plan should identify the level of retail growth for the town.

Warnes and Sones Ltd. stated that the draft plan puts too much reliance on large allocation in Lowestoft which could undermine the level of growth being planned for. They added that historically large sites generally have not proved a successful option in terms of housing delivery and this is particularly true in Lowestoft. They noted examples of Woods Meadow and the Kirkley Waterfront site.

G Youlden stated that the draft plan puts too much reliance on large allocation in Lowestoft which could undermine the level of growth being planned for. They added that historically large sites generally have not proved a successful option in terms of housing delivery and this is particularly true in Lowestoft. They noted examples of Woods Meadow and the Kirkley Waterfront site.

Members of the Public

Concern was raised that housing numbers were not subject to local investigation as they were based on projections from ONS and CLG. It was questioned whether the housebuilding industry would be able to increase supply to meet need, given that in recent years there had been limited development in Waveney.

It was questioned where the jobs would come form to support a growth in population.

Concern was raised that the Strategic Housing Market Assessment does not factor in the impact of Brexit and the likely reduction in inward migration from EU countries. Concern was also raised that
the projections were based on trends from 2010-2015 when it was suggested there was high inward international migration.

It was suggested that the reduced growth as a result of Brexit would mean that all of the growth could be accommodated in Lowestoft with only affordable housing and small units for local families in other locations in the District.

It was suggested that flexible housing requirements would be better, for example 5000-1000 new homes over the 22 year period with re-assessments every few years.

Concern was raised that if houses are built, more people will come to the area, therefore not having any effect on supply and demand.

Concern was raised that unattributable population change was excluded from the assessment. Concern was also raised at how the target of 9,019 homes was reached. It was stated that there was a logical fallacy in the assumption that increasing the target will increase the quantity of affordable housing delivered. It was suggested that if the objectively assessed need is a correct assessment of future housing demand, there will be no demand for housing in excess of the need. If developers consider that there is insufficient demand, they will not build.

It was questioned that if housing numbers are based on economic growth due to the offshore wind sector, then growth should be directed towards Lowestoft.

It was questioned why there were so many empty homes and second homes in the area. It was suggested that housing issues could be solved if second homes were no longer allowed.

It was questioned how many homes would be social homes and how many would be for wealthy people migrating into the area.

Concern was raised with the over-allocation of housing in that developers may ‘cherry pick’ the best and easier to develop sites in the rural areas over the brownfield site in Lowestoft.

Concern was raised that the need for 208 affordable homes per year was a theoretical figure not an achievable goal, therefore additional land for housing to meet this need was not justified.

It was noted that the plan makes no provision for windfall development even though the Strategic Housing and Employment Land Availability Assessment Land Availability Report identifies the potential for 920 homes to be delivered from this source between 2019 and 2036.

Concern was raised that the scale of growth planned would have a number of impacts including:
- Significant impact on the environment and food production.
- Increase in flooding from increased areas of built development.
- Increase in climate change
- Loss of productive farmland
- Impact on water resources
- Increase traffic congestion
- Hospital capacity
- Coastal erosion

It was suggested that rather than planning for new development, more should be done to get the existing housing stock up to standard. It was stated there were 1512 empty homes in Waveney and these should be bought back into use.

Concern was raised that the percentage for housing distribution relate to percentage of new housing planned rather than the percentage growth. Concern was raised that no attempt has been made to split the housing market area down into sub-market areas. It was suggested there was no evidence base for the distribution and the percentage for Southwold and Reydon was arbitrary and too high.

It was questioned why Option 1 from the ‘Options for the ne Waveney Local Plan’ consultation was rejected.

In terms of the distribution of growth, there was little consensus between member of the public.

- 2 members of public argued for greater levels of development in Lowestoft. It was suggested that the high unemployment and social issues, meant it should be the focus of the Council’s efforts. It was stated that the market towns could only accommodate growth if there were appropriate employment opportunities and it is not obvious where those will come from.
- 2 members of the public stated that Lowestoft should not accommodate the majority of growth and that Beccles and Worlingham had many larger alternative sites for development which could accommodate more than the 1473 homes proposed. It was suggested that Halesworth could also accommodate more than the 740 homes proposed. It was suggested that the economy of Lowestoft was not sufficient to support this growth.
- 1 member of public supported the level of housing for Beccles and Worlingham. It was suggested it was proportionally commensurate with the level of growth for Halesworth and Bungay.
- 1 member of the public suggested higher levels of development to Bungay and Southwold and Reydon.
- 2 members of public suggested that the level of development in Beccles and Worlingham was too high. It was suggested that Beccles is a fine market town with a pretty optimal population. The latest proposals for growth would do much damage to it. It was suggested that the economy of Beccles was not sufficient to support this growth.
- 1 member of the public suggested that rather than adding to additional towns, growth would be better planned by the creation of new settlements.
1 member of the public objected to level of development within Halesworth and Holton. It was stated that the infrastructure in 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. At this level of development it was suggested that it would be inevitable that green space and farmland would be built on. Concerns were also raised with respect to surface water flooding.

Many more comments were made in relation to overall levels of development in each town against the specific section of the Local Plan for each town/area.

**How these comments have been taken into account in the Final Draft Local Plan**

The objectively assessed need includes the Broads Authority objectively assessed needs number. This is stated under the ‘Duty to Cooperate’ heading in the introduction section of the Local Plan. It has also now been made clearer in the supporting text to Policy WLP1.1.

Text has been added to clarify how the need for care home/nursing home beds will be delivered. The number of empty homes has been considered in assessing the number of new homes required. Most empty homes are only empty for a short term and therefore will always be a feature of the local housing market.

References to Lowestoft in terms of distribution of growth have been amended to refer to the ‘Lowestoft Area’ which includes the town and the Parish Council’s which includes the areas covered by Lowestoft Town Council, Oulton Broad Parish Council, Oulton Parish Council, Carlton Colville Town Council, Gisleham Parish Council and Corton Parish Council.

The Council cannot set an overarching limit to development. Policy WLP1.3 will limit development on undeveloped greenfield sites beyond the allocations of the plan, but there could be further sustainable sites for development within settlement boundaries which would it would not be appropriate to restrict.

It is not considered necessary or appropriate to identify land for housing to deliver 20% above the minimum requirement. The Council has not counted windfall developments in its housing projections, which according to the Strategic Housing and Economic Land Availability Assessment (2018) could provide a further 990 homes.

A detailed trajectory has been included in the Appendix to the plan which demonstrates a five year supply of housing on adoption which will address the current shortfall.

It is not considered that at present the evidence demonstrates that Waveney is within a combined housing market area with Great Yarmouth. Furthermore it would not be a practical arrangement. The examination into the Great Yarmouth Core Strategy determined that Great Yarmouth is its own
self-contained housing market area. On most indicators the Waveney District is also its own housing market area as evidenced within the Ipswich and Waveney Housing Market Area Strategic Housing Market Assessment.

The Ipswich and Waveney Strategic Housing Market Assessment considered a number of trend timescales and concluded that the five year trend in the case of Waveney was the most robust. New population estimates are always being produced and it is considered there hasn’t been significant change to warrant updating the evidence at this stage. The evidence is therefore still considered proportionate.

The Council remains of the view that the evidence included in the Strategic Housing Market Assessment is robust with respect to the approach to market signals.

The National Planning Practice Guidance states that ONS Population projections for the starting point in the assessment of need. The Council does not consider there are any valid reasons from departing from this guidance.

The Council considers the evidence in the Employment Land Needs Assessment (2016) and the Employment Land needs Assessment Update (2017) to be robust. The job numbers in these studies are based on forecast from well respected economic forecasting companies.

The impact of Brexit on the future population is extremely uncertain. There is no evidence to suggest that Brexit will have any effect on inward migration in to the District or change in household sizes. Most net inward migration in to the District is a result on internal migration.

The approach to how the Strategic Housing Market Assessment has dealt with unattributable population change is considered robust. There are many uncertainties with this, and given that the National Planning Policy Framework seeks to boost significantly the supply of housing, it is considered that it is best to take a precautionary approach, and plan for the potentially higher level of migration.

Housing need is based on demographic trends not economic growth. However, the Strategic Housing Market Assessment has considered whether there will be a sufficient sized population to fill the jobs expected through economic growth.

Policy WLP8.2 requires 20-40% of new housing to be affordable.

It is considered necessary to over-allocate against need. It is acknowledge that over-allocating could result in developers cherry picking sites, however, the small extent of the over-allocation should limit this. On balance a over-allocation is still considered necessary in order to provide flexibility in housing supply and to help deliver more affordable homes.
There is no evidence to suggest that the scale of growth planned cannot be delivered in a sustainable way. The sites allocated in the Local Plan have all been tested for their sustainability, and although there will be some negative effects, on balance these are considered to be outweighed by the positive effects.

It is considered that in light of the comments raised, there is no evidence to suggest an alternative approach to distributing development would be more appropriate or sustainable.

**Key Diagram**

**Statutory Consultees**

The Broads Authority questioned the colouring on the key diagram.

**Parish and Town Councils**

No comments were made in response to this question.

**Other Organisations**

Suffolk Coast & Heaths Area of Outstanding Natural Beauty stated that the Heritage Coast is a linear designation and there is no defined 'landward' geographical boundary.

**Developers/Landowners**

M J Edwards and Partners welcomed the identification of Corton as a Large Village where growth will be focussed.

**Members of the Public**

No comments were made in response to this question.

**How these comments have been taken into account in the Final Draft Local Plan**

No changes are considered necessary as a result of the comments.
Policy WLP1.2 – Presumption in Favour of Sustainable Development

Statutory Consultees

Historic England raised concern about bullet point 1 of the policy unless their comments relating to embedding the historic environment in to the vision and objectives of the Local Plan are incorporated.

Parish and Town Councils

No comments were made in response to this question.

Other Organisations

Suffolk Coast & Heaths Area of Outstanding Natural Beauty stated that the policy should be amended to reflect national policies which indicate that the development should be refused or restricted.

Developers/Landowners

Gladman Developments Ltd. were supportive of the policy. They stated it affirmed the local planning authority’s commitment to making decisions based on a presumption in favour of sustainable development and it provided assurance of a local approach to planning that will proactively seek to improve the sustainability of the area by ensuring that development contributes to the specific strategic and local vision and objectives of the Local Plan.

Hopkins Homes objected to the policy. They considered that bullet point 1 of the policy was inconsistent with the National Planning Policy Framework as they stated the purpose of Paragraph 14 of the Framework is to ensure the delivery of sustainable development in cases where the vision, objectives and policies of local plans have failed to deliver.

St Johns Hall Farms stated the policy should be amended to confirm that the presumption will also apply in the interim period up until the adoption of the Local Plan.

Members of the Public

One member of the public questioned whether the plan was sustainable or could be made sustainable given the Government’s interpretation of the meaning of the word or their interpretation of the precautionary principle.
It was questioned whether there was flexibility with housing and employment development given the trends were based on out of date 2010-2015 estimates.

**How these comments have been taken into account in the Final Draft Local Plan**

No changes to the policy or supporting text are considered necessary. The policy is considered to be in accordance with and reflect the National Planning Policy Framework. The Local Plan takes effect once adopted therefore it is not considered appropriate to amend the policy to state it will apply in the interim period until adoption.

**Policy WLP1.3 – Settlement Boundaries**

**Statutory Consultees**

South Norfolk Council supported the reference in the policy to allow Neighbourhood Plans 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.

**Parish and Town Councils**

Holton Parish Council supported the response made by Cllrs G and A Cackett in relation to the infringement of their property’s boundary. It was suggested that the Settlement Boundary should be extended to cover their entire property.

**Other Organisations**

No comments were made in response to this question.

**Developers/Landowners**

Gladman Developments Ltd. objected to the use of Settlement Boundaries as they risk putting a strategy in place that arbitrarily restricts suitable development from coming forward on the edge of settlements. They added that this would not accord with the positive approach to growth required by the Framework.

The Somerleyton Estate supported the provision in the policy to allow Neighbourhood Plans to make adjustments to the site allocations without affecting the overall distribution strategy set out in this consultation document.
The Sotterley Estate supported the provision in the policy to allow Neighbourhood Plans to make adjustments to the site allocations without affecting the overall distribution strategy set out in this consultation document.

Members of the Public

It was suggested that the settlement boundary drafted for Westhall was too tightly drawn around existing properties, limiting the ability for infill development to take place, contrary to the aims of the policy. A settlement boundary for Westhall from a previous Local Plan was referred to as a better approach which included some undeveloped land fronting Wangford Road at Westhall Mill. It was stated that Westhall was linear in nature and frontage only development would be more suitable than the site allocated under Policy WLP7.21.

A member of the public from Holton suggested that the Settlement Boundary should be extended to cover their entire property.

It was questioned what had happened to ‘physical limits’.

How these comments have been taken into account in the Final Draft Local Plan

No changes considered necessary.

Policy WLP1.4 – Infrastructure

Statutory Consultees

Anglian Water Services welcomed the inclusion of reference to existing water recycling centres and wastewater network and the need for applicants to demonstrate that capacity is available. However, they added that there may be circumstances in which capacity is not currently available within the network or where part of development could be accommodated before mitigation is required. It suggested the following wording: “Specifically, developers should ensure there is capacity in the water recycling centre and the wastewater network in time to serve the development”. They added it would be useful for the policy to make reference to the use of planning conditions to control phasing of development.

The Environment Agency stated that it would be useful to include that the Lowestoft Flood Risk Management Project is designed to deliver flood risk benefits from all sources of flooding across the whole town, not just central Lowestoft. They were pleased to see the statement that development will not be permitted where capacity at water recycling centres is an issue. They would recommend
liaison with water companies and ourselves throughout the plan period to ensure adequate capacity is available.

Highways England states that it was 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.

Historic England stated that with respect to telecommunications infrastructure reference should be made to the Cabinet Siting and Pole Siting Code of Practice.

National Grid confirmed they had no comments on the document.

NHS England and the Great Yarmouth and Waveney Clinical Commissioning Group stated that growth planned in the Local Plan needs to be coordinated with the Norfolk and Waveney Sustainability and Transformation Plan which will result in extensive transformation to the way health and care services are delivered, potentially including changes to the physical infrastructure. They stated that within Waveney there are 12 GP practices and 2 branch surgeries; 28 pharmacists, 14 dental surgeries and Beccles hospital and these need to be considered when formulating the Local Plan. They stated that growth will have an impact on future healthcare service provision and that existing GP practices do not have the capacity to accommodate significant growth. They stated that 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. However, infrastructure will require further improvements to accommodate growth. In terms of future requirements, NHS England and the Great Yarmouth and Waveney Clinical Commissioning Group stated that the following will be required:

- Increased capacity in primary care facilities in Lowestoft by means of reconfiguration, extension or possible relocation of one or more existing health facilities. They noted a new build facility at Woods Meadow is planned in this area together with extensions to Rosedale Surgery.
- Increased capacity in primary care facilities in Beccles by means of reconfiguration, extension or possible relocation of existing health facilities.
- Increased capacity in primary care facilities in Bungay by means of reconfiguration or extensions.
- Increased capacity in primary care facilities in Halesworth by means of reconfiguration or extensions.
- Increased capacity in primary care facilities in Reydon by means of reconfiguration or extensions.
- Increased capacity in primary care facilities across District by means of reconfiguration, extensions or possible relocation.
NHS England and the Great Yarmouth and Waveney Clinical Commissioning Group stated that the exact nature and scale of mitigation will be calculated at the appropriate time, as and if schemes come forward over the plan period. They stated that 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 Clinical Commission Group to carry out certain development within a set timeframe, and do not give undue commitment to projects. Additionally, they requested further details on the likely phasing of multi-year developments.

Norfolk County Council state that the Local Plan should contain a policy on developer funding explaining how the impacts of the development proposed will be appropriately mitigated (i.e. either by Section 106 planning obligations and/or the use of the Community Infrastructure Levy (CIL)). They added 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.

South Norfolk Council were 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. Other key infrastructure projects outside the Waveney district were also noted, in particular improvements to the A47, which will directly impact parts of South Norfolk. They added 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. The Council indicated they 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.

Suffolk County Council stated it would be useful if 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. They added that this may necessitate reconsideration of the District Council’s Regulation 123 List. The County Council also provided an update on education infrastructure requirements. And waste infrastructure requirements.

UK Power Networks indicated that it is difficult for them to estimate capacity requirements without knowing the detail of the sites. They provided high level information on the capacity of primary substations, all of which had capacity of at least 3MVA with some substations in Bungay and Lowestoft having capacity of over 7MVA. They indicated that with respect to Beccles there was sufficient capacity in the primary substations in Beccles and Barsham, however, to connect any significant additional demand the 11kV network will require reinforcement. They indicated that this will require 2km of new cabling which will need to be funded from developers.
Parish and Town Councils

Barnby Parish Council stated that the A146 from Barnby to Carlton Colville is not fit for purpose. They stated it needs frequent repairs and is dangerous due to sharp corners and junctions from small roads. They added that the Parish Council will campaign for a replacement road and urged the District Council to support the campaign.

Lowestoft Town Council urged the plan to 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 fibre optic connection to the end user. The Town Council stated the plan should require new open space on all developments of one hectare and larger (not generally). They added that open space should be contiguous and located at the front boundaries of all new developments and the Parish or Town Council who may own them being consulted during the development.

North Cove Parish Council stated there was a need for quality employment in the area which should be close to new housing and come first. They stated that it was pointless to increase the size of doctor’s surgeries, schools and hospitals if it is impossible to attract doctors, nurses, teachers to the area to fill vacancies. They added that extra housing will increase the pressure on already overstretched and exhausted staff.

Ringsfield and Weston Parish Council raised concern about drainage from where the Southern relief road joins London Road contributing to flooding in Beccles and towards Weston. They were also concerned that the relief road will increase traffic using Cromwell Road and School Road in Ringsfield. They requested traffic calming measures to mitigate the negative impact of increased and faster traffic. Through Weston on London Road (A145), they suggested a speed limit of 50mph would be desirable heading away from and towards the proposed roundabout.

Other Organisations

Beccles and Bungay Cycle Strategy stated that the Beccles Southern Relief Road will deliver some relief to the communities of Beccles and Worlingham. They were concerned that this relief will not be maximized and that it may be eroded with time. They would like to see through traffic discouraged by diverting the A145 along the relief road avowing the town altogether, reducing speed limits on approach roads to Beccles and Worlingham and introducing severe weight restrictions to ensure HGVs avoid the town.

The Education and Skills Funding Agency provided background on their organisation and welcomed that the policy 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”. They welcomed the direct reference to primary school provision. They added that the plan should make reference to national planning policy in respect of provision of school places. They welcomed the identification of new primary school sites in site allocation policies and stated that the next version of the 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. The agency also recommended that the next version of the plan highlights:

- 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
- 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.

They also suggested that a Planning for Schools topic paper could be prepared to clearly set out the evidence behind school need.

The River Waveney Trust welcomed 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.

Developers/Landowners

Benacre Estates Company supports the policy with particular reference to improvements on the A12 and provision of Broadband. They made reference to the historic plans to bypass Wrentham.

Bourne Leisure Ltd. stated that the policy should be re-phrased to ensure reference to viability. They suggested the following wording: “All-Where appropriate and viable, development will be expected to contribute towards infrastructure provision to meet the needs generated by that development”

Statuslist Ltd. supported the policy. However, they stated that it was necessary for the policy to acknowledge that development viability may result in reduced financial contributions to allow a scheme to be delivered.

Members of the Public

Concern was raised by a number of members of the public about the existing provision of infrastructure across the District.
Concern was raised that there was a lack of good, suitable road system especially to the south of Lowestoft and that frequently the town was grid-locked.

It was suggested that the Third Crossing planned for Lake Lothing should be a spanned bridge with a dual carriageway. It was suggested that the bridge is needed now and that buses in Lowestoft should run later into the night.

It was noted that education provision was seriously lacking both in quality and access. It was suggest that many were over-subscribed, understaffed or under threat of closure. Concern was raised that the area fails to attract quality teachers. It was stated that pupil motivation is affected by local and post-school employment prospects.

It was identified that health provision was a major issues, particularly due to the ageing population.

It was suggested there was a lack of rail provision and the service was unreliable.

It was noted that the lack of trunk roads meant any disruption has serious impacts.

It was suggested that any increase in population 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.

It was stated that if communities are to flourish, there needs to be provision of employment, schooling, improved transport networks, medical facilities and leisure opportunities.

Concerns were raised about the impact of proposed growth in Beccles and Lowestoft on the infrastructure of those towns.

It was noted that cycles, trains and buses were important too.

Concern was raised that there was no mention in the plan about expanding hospital provision.

Concern was raised about how the health centre in Beccles would cope with new residents.

Concern were raised about the health care provision in Halesworth, particular as the town is distant from the district hospitals. Concern was also raised about flooding in the town.

It was questioned how infrastructure charges would be grouped together to pay for extra green space, leisure facilities, healthcare facilities, water, sewerage, flood prevention etc. if extra housing was made up of many small developments instead of large developments.
Many more comments were made in relation infrastructure in each town against the specific section of the Local Plan for each town/area.

**How these comments have been taken into account in the Final Draft Local Plan**

Policy WLP1.4 has been amended to state that improvements to the wastewater infrastructure need to be made in time to serve the proposed development.

The supporting text has been amended to state that the Lowestoft Flood Risk Management Project is designed to deliver flood risk benefits from all sources of flooding across the whole town.

The Infrastructure Framework in Appendix 1 has been updated following further conversations with NHS England and the Great Yarmouth and Waveney Clinical Commissioning Group.

The approach to the Community Infrastructure Levy and Section 106 planning obligations has been clarified in the text.

Reference to improvements to the A146 have been added to the Policy.

It is not foreseen that there will be any strategic infrastructure projects outside of District which will require developer funding. It is already a feature of the Community Infrastructure Levy that receipts can be spent outside of the District should a need arise. Therefore it is not considered necessary to make any further reference in the supporting text.

The Policy supports the provision of high-speed broadband.

The Policy requires the provision of open space on residential developments of more than 1 hectare.

The Beccles Southern Relief Road is currently under construction. The impacts and mitigation from this proposal would have been considered at the time of the planning application. In line with this policy the Council will support measures which improve the success of the project.

The specific requirements for new education provision are set out in the Infrastructure Framework in Appendix 1 to the plan.

It is not considered appropriate to mention viability in this Policy. If development generates an essential or critical need for infrastructure which cannot be funded and viably delivered, that development would not be considered sustainable and therefore would not be supported. The Community Infrastructure Levy, which is the main funding source for off-site infrastructure is a fixed charge which cannot be reduced in light of viability issues.

The Local Plan will not have specific criteria for the design of the Third Crossing. This is a major piece of infrastructure which is being progressed through the Nationally Significant Infrastructure Projects consent process.
It is considered that Policy WLP1.4, together with the Infrastructure Framework in Appendix 1 will address the concerns about infrastructure provision raised by members of the public.

Lowestoft, Carlton Colville, Oulton and Oulton Broad

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Strategy for Lowestoft

Statutory Consultees

The Broads Authority questioned whether an issue to consider is that development needs to support
the town centre.

New Anglia Local Enterprise Partnership supported the identification of Enterprise Zone sites within
the Strategy for Lowestoft.

Parish and Town Councils

Lowestoft Town Council stated that the way the plan aggregates Lowestoft Parish with surrounding
parishes making up the urban area make it difficult to understand what will actually affect the parish
of Lowestoft.

Oulton Parish Council stated that the First Draft Local Plan is fraught with danger to Oulton Village’s
existence and feel that once again local input is not being heard. They stated that with issue of
Woods Meadow the village will not survive another influx of 340 houses. Oulton Parish Council
consider that the Neighbourhood Plan for Oulton is at a critical stage and should be allowed to come
to fruition and so should be taken into consideration.

Other Organisations

The Oulton Parish Neighbourhood Plan Steering Group raised concern that the consultation
document does not take into account the time spent on trying to develop a Neighbourhood Plan nor
does it gives consideration to the fact that the consultation commenced immediately after the
collection of the completed questionnaires when the message they 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. They added that the addition of proposed housing within the Oulton neighbourhood plan designated area in the Local Plan has severely undermined the commitment made to the parishioners of Oulton by the Steering Group and the Parish Council that they would have the ability to help formulate a plan that included the requirement for housing and relevant services. They raised concern about the existing Woods Meadow development and the impact it may have. They stated 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. They questioned why the plan delays development in Blundeston until after the prison redevelopment is complete but not in Oulton in relation to Woods Meadow. They also compared the level of housing development proposed in Kessingland with that proposed in Oulton and the fact that the Local Plan considered it unnecessary to allocated further development to Kessingland. They requested that 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.

**Developers/Landowners**

MJ Edwards & Partners observed that paragraph 2.3 which states the desire to avoid coalescence between settlements would mean that any scope to extend the settlement of Corton itself would be unreasonably constrained.

Forecore Limited objected to the reliance placed on the two large sites WLP2.12 and WLP2.15. They identified a number of constraints with both sites and stated that these constraints may frustrate delivery on these sites. They provided the example of Woods Meadow as a large site which had significant delays in being brought forward for development. They suggested it was necessary to include a number of smaller sites to give greater confidence of delivery in the town. They made reference to the housing white paper “Fixing our Broken Housing Market” (Feb 2017) and how it identifies the need for releasing more small and medium sized sites for development. They added that their site in Oulton was a suitable site which could deliver homes quickly.

Hopkins Homes consider that the approach to development in Lowestoft will be counterproductive if the aim is to try and secure the redevelopment of ex-industrial brownfield land within the town. They stated by allocating large greenfield sites in Lowestoft this would detract developers from redeveloping the brownfield sites as the greenfield site would significantly cheaper and easier to develop. They considered that there was 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. Hopkins Homes suggested the Council should 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. They suggested Halesworth and Southwold and Reydon to be the most sustainable location for this additional growth.
G Youlden objected to the reliance placed on the two large sites WLP2.12 and WLP2.15. They identified a number of constraints with both sites and stated that these constraints may frustrate delivery on these sites. They provided the example of Woods Meadow as a large site which had significant delays in being brought forward for development. They suggested it was necessary to include a number of smaller sites to give greater confidence of delivery in the town. They made reference to the housing white paper “Fixing our Broken Housing Market” (Feb 2017) and how it identifies the need for releasing more small and medium sized sites for development. They added that their site on Gunton Avenue was a suitable site which could deliver homes quickly.

Warnes and Sons Ltd. objected to the reliance placed on the two large sites WLP2.12 and WLP2.15. They identified a number of constraints with both sites and stated that these constraints may frustrate delivery on these sites. They provided the example of Woods Meadow as a large site which had significant delays in being brought forward for development. They suggested it was necessary to include a number of smaller sites to give greater confidence of delivery in the town. They made reference to the housing white paper “Fixing our Broken Housing Market” (Feb 2017) and how it identifies the need for releasing more small and medium sized sites for development. They added that their site on Hall Road, Carlton Colville was a suitable site which could deliver homes quickly.

**Members of the Public**

Concern with the overall growth proposed for Lowestoft was expressed.

Concern as raised about the level of traffic on Oulton Street and the likely increase as a result of new development. Concern was raised about safety on other surrounding routes.

Concern was raised that doctor’s surgeries in the Oulton area were over-subscribed.

It was noted that the sewerage and drainage system needed to be addressed.

The impact on wildlife and heritage from proposed developments was raised.

Concern was raised that the First Draft Local Plan had not had regard to the fact that Oulton are preparing a Neighbourhood Plan.

Concern was raised that the level of development in Oulton would mean it will lose its character as a village.

It was noted that the high street in Lowestoft is struggling from unoccupied units and too much low quality retail. It was suggested that action was needed to revitalise the town to bring in more business. It was noted that out-of-town retail was diverting trade away from the town centre and
increasing congestion. It was noted there were insufficient car parking spaces and the link between the town centre and the beach was poor. It was suggested that the priority for the Council should be on residential expansion of brownfield sites close to the centre. It was suggested that the town should be made more appealing to tourist and that aspects of the Southwold success story could be replicated in the southern beach area of the town.

It was suggested that the town needed an increase in leisure facilities including nightclubs.

It was suggested that Neves pit on Normanston Drive would be suitable for development.

Concern was raised that homes planned would be for people moving into the area. It was considered this would further drive up the cost of properties.

Concern was raised that the plan focussed on new homes, the number of which were out of proportion with the proposals for new employment.

How these comments have been taken into account in the Final Draft Local Plan

No changes to the overall strategy for Lowestoft are considered necessary.

The urban area of Lowestoft extends into the parishes of Oulton Broad, Oulton, Carlton Colville and Gisleham. In terms of planning strategically for the growth of Lowestoft it is therefore necessary to consider these areas together. For Lowestoft to grow and take a reasonable share of the District’s development needs relative to its size, it is inevitable that this development will have to occur on greenfield land in some or all of these Parishes. In planning for the growth of Lowestoft it may also be necessary to expand into other Parishes which border Lowestoft, such as Corton. The strategy has sought to maximise the amount of development which can occur on brownfield sites within Lowestoft and Oulton Broad. In terms of greenfield allocations, the strategy has sought to direct these to the least environmentally sensitive land where there is greatest potential for social and economic gains. This is evidenced in the Sustainability Appraisal Report.

Large sites including the WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood, WLP2.12 North Lowestoft Garden Village and WLP2.15 Land south of the Street Carlton Colville will provide an important source of housing which also has the benefit of providing new on-site infrastructure to support the needs of new development. It is appreciated that these sites can take time to come forward and as such conservative estimates have been made with respect to delivery on these sites. These sites are complimented by two further smaller allocations and around 20 existing commitments on smaller sites within the Lowestoft area. Furthermore, the vast majority of housing allocations outside of Lowestoft are on smaller sites which can deliver housing quickly. The Council therefore considers that the overall strategy for the District which includes a good mix of large small

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and medium sized sites in many different locations will enable a robust supply of housing over the plan period. Relying exclusively on smaller sites reduces the opportunity to secure new infrastructure improvements.

In terms of concerns relating to Oulton’s Neighbourhood Plan, the Council is supportive of communities undertaking Neighbourhood Plans. However, Neighbourhood Plans cannot be used to stop or limit the amount of development an area can take. The Council’s Local Plan needs to set out the strategic matters concerning growth and development for the Waveney District. Importantly, it must set out a plan for meeting objectively assessed needs for housing and ensuring a rolling five year supply of housing. This means there is a necessity to identify sites for development within the plan in all parts of the District, irrespective of whether a Neighbourhood Plan is under preparation or not. If the Local Plan does not identify sufficient land to meet a five year supply, there is a significant risk that speculative development could occur in advance of Neighbourhood Plans coming forward. The identification of sites in the Local Plan, necessary to meet objectively assessed need does not undermine the value of preparing a Neighbourhood Plan for that area, which could have significant influence on the shape and design of development coming forward and other non-strategic matters.

In terms of the concerns raised by Hopkins Homes, the allocation of greenfield land on the edge of Lowestoft is not considered counterproductive to the aims of regenerating brownfield sites. The brownfield sites together with the greenfield sites allocated and existing commitments equates to some 5000 new homes over the plan period, equal to 230 homes per year. It is considered that the market in Lowestoft is strong enough to support the development of 230 homes per year in Lowestoft. The housing market in Lowestoft has supported this level of homes in the past and therefore there is no reason to suggest it wouldn’t in the future. Therefore, the development of greenfield sites should not detract from interest in the brownfield sites.

In terms of concerns relating to infrastructure provision, through liaison with key infrastructure provider, the plan has identified where there are issues with the provision of infrastructure and has identified the necessary improvements required. There are sufficient mechanisms in place to ensure the delivery of infrastructure including developer contributions.

Improving the town centre and central and coastal areas of the town are key to the strategy for Lowestoft. This includes identifying improvements to the town centre and providing a positive strategy for the regeneration of brownfield sites.

**Infrastructure Needs**

**Statutory Consultees**

Anglian Water Services stated that they are in the early stages of producing 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. They noted that 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 they are approached by a developer and an appraisal is carried out.

The Broads Authority suggested that the items listed under ‘Green Infrastructure’ should be categorised as open space and recreation or community facilities.

**Parish and Town Councils**

Oulton Parish Council stated that with Woods Meadow being developed infrastructure is going to be overloaded. They acknowledged that a school, community centre and doctor’s surgery will be built on the development to accommodate the influx of people into the area, but these are already painfully slow in materialising with deadlines not adhered to or missed continuously. They raised concern that roads are not of a standard to accommodate additional housing. They added the Hall Lane, Somerleyton Road and Gorleston Road are pinch points and there should be HGV restrictions in place.

**Other Organisations**

Beccles and Bungay Cycle Strategy welcomed the inclusion of the Pedestrian and Cycle Bridge over Lake Lothing at Brooke Peninsula (including new bridge over railway line to Normanston Park) and the improvements to the cycle network as identified in the Waveney Cycle Strategy. They added that to support development allocated by Policy WLP2.12 a grade-separated pedestrian and cycle crossing over (or under) the A47 was required.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

It was suggested that cycling in Lowestoft is dangerous and that cycle routes could be improved. An example of blue tarmac tracks as used in London was highlighted. It was suggested that there was a need for proper separation of cyclists, pedestrians and cars.

Concern was raised that the Third Crossing will not be delivered by December 2022 and whether the pedestrian and cycle bridge next to the Bascule Bridge would be delivered.
It was suggested that recent changes to Bloodmoor Roundabout have improved the situation for pedestrians, and any further changes need to take this into account.

It was suggested that Lowestoft Station needs a revamp.

Concern was raised about flooding in Carlton Colville, which it was suggested had been exacerbated by new development.

It was questioned whether it would be viable to have another school in Carlton Colville.

It was suggested that to encourage inward investment into Lowestoft better national transport links were required.

Support was given to the delivery of the pedestrian and cycle bridge and implementation of the Waveney Cycle Strategy.

It was suggested that with the completion of the Third Crossing it was essential to put measures in place to reduce car traffic on the existing road network to avoid traffic volumes increasing back to the levels experienced today.

It was requested that Lowestoft Town Council should be involved in the process for improvements at Lowestoft Station.

A need was expressed for pedestrian access to all areas, free from cyclists, traffic, skateboarders and motability scooters.

Improvements to surface water drainage in the area of Famona Road, to the Gardens, The Street Carlton Colville were requested. It was suggested at times the area was impassable. It was stated that the foul sewers in the areas are often blocked and extensive improvements would be required before the construction of 800 new homes.

A one-way system around central Lowestoft was requested.

It was stated that new allotments proposed off Monckton Avenue should be considered in this section of the plan.

It was requested that the Third Crossing was shown on all plans in the document.
How these comments have been taken into account in the Final Draft Local Plan

There is no evidence to suggest that the growth planned for Lowestoft would overload infrastructure. Whilst the level of growth planned will exceed the capacity of some types of infrastructure, the plan identifies improvements to infrastructure which will mitigate these impacts.

It is agreed that cycle routes need to be improved, the plan identifies some specific improvements and there are others detailed in the Waveney Cycle Strategy which the plan gives weight to.

The existing flooding problems in Carlton Colville are acknowledged in the plan. Policy WLP2.15 allocate land in Carlton Colville for 800 homes which will deliver mitigation to the existing flood problems along The Street in Carlton Colville. This site will also generate the need for and deliver a new school for Carlton Colville.

Policy WLP2.3 promotes improvements to Lowestoft Station. Lowestoft Town Council will be a consultee in any proposed works.

It is agreed that better national transport links are required. Policy WLP1.4 states that the Council will support improvements to the A12 between Lowestoft and Ipswich and the A47 between Lowestoft and Peterborough.

It is agreed that the Third Crossing is essential mitigate traffic impacts. Transport modelling undertaken to support the Local Plan as reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) has also identified further essential works at Bloodmoor Roundabout which will be necessary in order for the growth to be accommodated.

Improvements to the highway system around Lowestoft will be considered as part of reviews of the Local Transport Plan and work being undertaken on the Lake Lothing Third Crossing.

It is not considered appropriate to show the Third Crossing on the formal Policies Map until the crossing has consent.

It is agreed that reference to the proposed Monckton Avenue allotments should be referenced.

Policy WLP2.1 – Central and Coastal Lowestoft Regeneration

Statutory Consultees

The Broads Authority questioned whether the identification of Lowestoft as a priority regeneration area has formal status and whether it is identified at a national or local level.
Historic England broadly welcome the objectives for Central and Coastal Lowestoft. However, they stated that the objectives and supporting text could be more specific about the historic environment, its current state and opportunities for heritage-led regeneration.

The Marine Management Organisation stated that 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.

Suffolk County Council welcomed the first objective for central and coastal Lowestoft. They noted 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.

Parish and Town Councils

Lowestoft Town Council urged that a central tourism visitor centre was re-established.

Other Organisations

Suffolk Wildlife Trust supported Objective 10.

Developers/Landowners

Statuslist Ltd. broadly support the policy. However, they requested greater flexibility in recognition of fluctuating national and local economic conditions and public sector funding. They suggested a further objective of “Ensure proposals are flexible and deliverable”. They added that this would be in line with objective 13 of the current Area Action Plan and would be in line with advice in the Inspector’s Report for the Area Action Plan.

Members of the Public

It was requested that the North Denes area remains exclusively as public open space. Support was given to the enhancement of this area as an open space, with improvements to public access. It was noted that this was the case in the Note of Implementation prepared by the Council for this area. It was noted that the areas 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. The wildlife value of the area was noted. Whilst it was acknowledged that Lowestoft
Town Council may prepare a Neighbourhood Plan to give this area protection, it may take some time to prepare, therefore it was essential that the Local Plan protected this area.

It was suggested that the caravan park on North Denes should be removed to produce a long, open coastal strip, for the benefit of wildlife particularly migrating birds and the citizens of Lowestoft. It was suggested that the area north of oval only needed tidying up with ecologically suitable planting. It was added that the East of England Park should be returned to a natural state with net drying racks restored and designed to be vandal proof. It was noted that the area, together with the North Denes is a bird migration stop over point.

It was stated that it was confusing to call area 1 “North Denes Tourism and Ecological Enhancement Area” as it didn’t cover the area most recognised as North Denes. Concern was raised about the loss of open space designation for DIP Farm in this are and that this may lead to a static caravan development.

It was suggested that a more innovative approach would benefit the town centre. It was suggested that parts of London Road North could be used for small housing units, including building over parts of the pedestrian street to provide a wind break. More restaurants, cafes and small shops were suggested alongside new housing units. Rather than a town centre hotel or a cinema, replacing the Battery Green Car Park with affordable housing apartments, was suggested as a better option.

It was suggested that the brownfield sites that this policy seeks to regenerate will never be delivered whilst greenfield sites are allowed to be developed. It was suggested that no greenfield sites in Waveney or Suffolk Coastal should be allowed to be developed until the regeneration sites in Lowestoft are fully developed.

A discrepancy on the extent of the East of England park as shown on the map on page 45 compared to the map on page 47 was noted.

**How these comments have been taken into account in the Final Draft Local Plan**

Lowestoft has been previously formally identified at a national level as a priority area for regeneration through the designation of the Urban Regeneration Company. It was also identified in the former East of England Plan (Regional Strategy) as an area for regeneration. It has long been recognised locally in successive Local Plans and economic s and community strategies as a focus for regeneration.

It's agreed the section could be more specific about the historic environment and references have been added to the objectives and supporting text.

It is agreed that greater reference and linkages to the Marine Plan could be made throughout the Local Plan. Extra references have been made throughout the plan.
It is considered that the plan provides sufficient detail within the Central and Coastal Lowestoft section and in particular Policy WLP2.3 about possible improvements the Third Crossing could deliver. A Town Centre Strategy/Masterplan will be prepared which will add further detail in this respect.

The Local Plan policies and objectives would support the development of a central tourism visitor centre.

It is not considered necessary to have a specific objective on flexibility and deliverability. The objectives contained within this section are output objectives, which such an objective would be inconsistent with. Furthermore, the planning system has flexibility built in, and the Plan needs to be deliverable and flexible in the policies it contains in order to be sound.

The spatial objectives for the themed opportunity areas within this section would ensure that the undeveloped parts of North Denes remain as public open space. The area is also designated as open space on the draft Policies Map and therefore has protection afforded to it under proposed Policy WLP8.23 on Open Space.

It is acknowledged that boundary between opportunity areas 1 and 2 is incorrect. As such Area 1 has been moved southwards.

A Town Centre Strategy will be prepared to help support the town centre. Permitted Development Rights already allow the provision of housing above shop units and the conversion of some shop units into housing. Policy WLP8.19 on the Vitality and Viability of Town Centres promotes a greater range of uses within town centres, including the provision of cafes and restaurants along primary frontages.

Given the significant housing need for the area it is not possible to restrict the development of greenfield sites until the brownfield sites are complete. The brownfield sites together with the greenfield sites allocated and existing commitments equates to some 5000 new homes over the plan period in Lowestoft, equal to 230 homes per year. It is considered that the market in Lowestoft is strong enough to support the development of 230 homes per year in Lowestoft. The housing market in Lowestoft has supported this level of homes in the past and therefore there is no reason to suggest it wouldn’t in the future. Therefore, the development of greenfield sites should not detract from interest in the brownfield sites.
Policy WLP2.2 PowerPark

Statutory Consultees

Highways England stated that this employment site is directly associated with offshore operations which brings with it a set of peculiar challenges and opportunities. They stated they would like to see the Plan maximise its emphasis wherever possible on sustainable transport initiatives that will be considered exemplary in this employment sector.

Historic England stated that 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. They welcomed reference in the policy to the Scores and Historic High Street and the aspiration to retain non-designated heritage assets. They recommended further consideration of the wording of this part of the policy to ensure it is National Planning Policy Framework (NPPF) compliant.

The Marine Management Organisation stated that 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).

Suffolk County Council stated the site is accessed from the A47 trunk road and that sustainable links to the town centre are required.

Suffolk County Council noted development surface water could discharge into sea unrestricted but would have to size attenuation for tide lock scenario. They noted the site was in Tidal flood zone 2 and 3.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

Suffolk Wildlife Trust noted 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, they stated that prior to considering mitigation, development should first seek to avoid any impacts.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that it would be wonderful if cyclists could get access to the seawall from the end of Hamilton Road.

Support was given to the expansion of the fishing industry.

Support was given to concentrating on the offshore and sustainable power sector in this area.

It was suggested that electrical charging points should be extended across the site.

It was suggested that another turbine could be included in the area and that the area around the current turbine should be cleared to make the site more attractive to business.

How these comments have been taken into account in the Final Draft Local Plan

In terms of sustainable transport, the site is within a town centre location which benefits from good access from bus services, and train services. The Policy encourages the improvement of cycle and pedestrian links to the site and within the site.

Reference to the conservation areas has been added into the supporting text and further information has been added with respect to the non-designated heritage assets with links made to the heritage policies of the Local Plan.

Reference has been added to the Marine Plan and specific policies relating to employment and offshore wind. Reference to the Marine Management Organisation has also been made to the policy.

With respect to concerns raised by Suffolk Wildlife Trust, the policy has been amended to make clear that development should first avoid effects on the County Wildlife Site.

The provision of electric charging points is covered in Policy WLP8.21 on Sustainable Transport.

Proposals for renewable energy will be considered under Policy WLP8.27 of the Local Plan.
Policy WLP2.3 Peto Square

Statutory Consultees

The Environment Agency stated that proposals for more vulnerable development would still need to pass the Exception Test to demonstrate that development is safe, despite the planned Lowestoft Flood Risk Management Project. They added it 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 Exception Test must consider the residual risk of flood risk from failure of defences.

Historic England welcomed paragraph 2.20 which sets out the importance of the square as a point of arrival, defined by a number of historic buildings. They welcomed the policy requirement of high quality public space, bringing the Customs House back into use, and preserving and enhancing the conservation area through the regeneration. They added they 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.

Suffolk County Council stated that it was necessary to improve sustainable links (walking/cycling along north side of Lake Lothing) and provide cycle parking.

Suffolk County Council noted the minerals wharf Hamilton Docks and North Quay in Lowestoft is within 250m of the allocation. They noted it is unlikely that the development of these sites will cause the loss of the minerals wharfs, hence the allocations are not opposed. However, they noted that the District Council should be aware of the proximity to a safeguarded facility and policy requirements should be included 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.

Suffolk County Council noted development surface water could discharge into Lake Lothing unrestricted but would have to size attenuation for tide lock scenario. They noted the site was in Tidal flood zone 2 and 3.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that development should not be planned until the new third crossing is in place.

It was suggested that the policy was essential as the area was currently very unsightly and an awful approach into the Lowestoft central area.

It was suggested that the Conservation Area should be extended to include areas with large amounts of Victorian architecture. It was added that so much had already been ruined due to alterations.

It was suggested that this public space and others are poorly managed and either accommodate anti-social behaviour or appear scruffy and dilapidated. It was suggested that skateboarders, cyclists and motorcyclist should be removed from the pedestrian areas. It was added that more greenery would help. It was suggested that the sea-gull problem needed to be dealt with in a humane manner.

How these comments have been taken into account in the Final Draft Local Plan

Clarification has been added to the supporting text to state that the Customs House is a grade II listed building and also known as the ‘Port House’.

Site specific flood risk assessments will include sufficient detail to pass the exceptions test.

The site is not within 250m of a minerals wharf and development is unlikely to have an impact on the mineral wharfs in Lake Lothing or the Outer Harbour.

The Policy supports sustainable transport measures and requires better pedestrian links and permeability. It also supports measures to reduce the impact of traffic which will improve the attractiveness of sustainable modes of transport to and through the area.

The Policy seeks to improve the public realm. Further detail will be added through the forthcoming Town Centre Strategy/Masterplan and any subsequent Neighbourhood Plan or Supplementary Planning Document.
Policy WLP2.4 Kirkley Waterfront and Sustainable Urban Neighbourhood

Statutory Consultees

The Environment Agency support the sequential approach to flooding within the policy. They added that the policy should emphasise the need for flood risk assessments to accompany individual planning applications. They advised that the section should identify the possible risks of contaminated land due to previous industrial uses. They welcomed the desire to increase the biodiversity across the site including increasing the habitat for the common lizards.

Highways England stated that it seems clear that the 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. They added that this assumption needs to be tested by evidence supporting the plan, in particular any impact on the A47/Millennium Way.

New Anglia Local Enterprise Partnership welcomed the identification of employment land designation in the Riverside Road Enterprise Zone.

Suffolk County Council stated that an internal spine road (linking through the sites) and permeability for sustainable modes are required. They added that the layout may need to be reconsidered in light of emerging access proposals for the Lake Lothing Third Crossing. They noted the original masterplan included a pedestrian and cycle bridge linking the sites to Normanston Park.

Suffolk County Council noted the minerals wharf Hamilton Docks and North Quay in Lowestoft is within 250m of the allocation. They noted it is unlikely that the development of these sites will cause the loss of the minerals wharfs, hence the allocations are not opposed. However, they noted that the District Council should be aware of the proximity to a safeguarded facility and policy requirements should be included 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.

Suffolk County Council stated that the site is 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.

Suffolk County Council noted development surface water could discharge into Lake Lothing unrestricted but would have to size attenuation for tide lock scenario. They noted the site was in Tidal flood zone 2 and 3.

Parish and Town Councils

Gisleham Parish Council stated that the site could accommodate a more focal point sports arena. This area would be central to the population of Lowestoft and close to the third crossing with easy
access to public transport, walking and cycling. They added that the effect of potential flooding would be minimal.

**Other Organisations**

Suffolk Wildlife Trust stated that whilst paragraph 2.30 recognises that the County Wildlife Site on the allocation, provides habitat for the 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. They noted that the existing consent for development on the site involved the loss of part of the County Wildlife Site, the revision of the policy provides an opportunity to consider a holistic approach to redeveloping the whole area to retain a greater proportion of the County Wildlife Site. They questioned, whether access could be achieved through the Sanyo site rather than the County Wildlife Site. They agreed that development should support and enhance ecological networks through the site and that development should facilitate enhancement of the County Wildlife Site. They stated the policy should seek to protect the County Wildlife Site from development.

**Developers/Landowners**

Badger Building stated that development of this site is ransomed by the need to relocate the Jeld Wen playing field. They raised concern that the permission on the Brooke Business Park site is now 2 years old and no reserved matters application has been made. They added that given the timescales for the necessary technical work, they conclude that development is some way off. They remain of the view that the outline consent on the site is not deliverable and is not an attractive proposition for the market,

Gladman Developments Ltd. state that the Local Plan should take into account the risks associated with the delivery of large scale schemes such as this one.

Hopkins Homes suggested that there were viability issues with respect of delivery on this site and that there is little developer interest in the site. They also noted that the planning permission on the Brooke Business Park site only has a year left till it expires. Given the high risk that the consent will expire, they suggest that 300 homes should be deleted from the Local Plan housing trajectory from delivery on this site.

Statuslist Ltd. stated that there had been very limited interest in the Jeld Wen Factory part of the site for industrial purposes since July 2012. Concern was raised that no residential development had occurred on the site since the adoption of the Lake Lothing and Outer Harbour Area Action Plan. They raised concern that this lack of delivery meant that areas around the Brooke Peninsula and the Sanyo factory site are not deliverable. They added that the proposal for half of the Jeld Wen Factory site to be used for employment was not deliverable. They stated that there is limited activity in the
office sector and the industrial market has declined since the 2014 oil price crash. They also stated that sales activity for mainstream residential is low in the area. They argued that a viable form of development of the entire Jeld Wen Factory site would be shared ownership affordable housing. They noted the benefits of this type of housing to increasing the affordability of the housing stock. In terms of flood risk, they made reference to the proposed strategic flood defences project which would help protect the development. As a result they suggested amending the policy to refer to a minimum of 1380 homes across the site and remove reference to the locational specifications for different uses across the site.

Members of the Public

A number of respondents supported the use of the site for commercial and industrial development and raised concern that if housing is developed on the Brooke and Jeld Wen site, any resurgence of maritime trade and construction will be limited. It was added that the Brooke site in particular is uniquely suitable for ship building and offshore energy construction. The potential for tidal power was also noted. It was added that people do not need to live near water and that Lake Lothing has been the source of prosperity in the past and could be again.

Concern was raised that the impact on Heath Road had not been fully understood. Concern was raised about some of the detail with respect to the current live planning permissions on the site, with respect to separation distances and building heights. It was requested that building heights on Heath Road should be limited to two storeys.

Concern was raised about the narrow access from Victoria Road and Waveney Drive to the site and the risk from flooding.

It was suggested that more could be done to exploit the water frontage for uses other than housing such as tourism. It was added that tourism was main industry the town had to offer.

Support was given to the redevelopment of this area in preference to greenfield sites to the north of the town.

Concern was raised about the impact on the road network and the traffic caused by the new houses and the school on the site.

How these comments have been taken into account in the Final Draft Local Plan

The Policy has been amended to include the requirement for site specific flood risk assessments.

The development of this site is unlikely to have any impact on the minerals wharf and should be in accordance with Policy 6 of the Minerals Core Strategy. The minerals wharf referred to by Suffolk County Council is within the area designated by Policy WLP2.9 ‘Inner Harbour Port Area’ this policy
requires development next to or opposite the area to ensure potential conflicts are mitigated through the layout, use and environmental credentials of new buildings. It also requires developers to liaise with port operators to ensure that potential conflicting uses are addressed prior to any application for planning permission.

It is not considered that a sports use is the most optimal use of this area. The site’s central location and brownfield status lead it to being a suitable site for mixed-use housing and employment.

The supporting text has been amended to make reference to other species present on the County Wildlife Site. The access arrangements for the site were considered in some detail during the preparation of the Lowestoft Lake Lothing and Outer Harbour Area Action Plan and through the preparation of the Sustainable Urban Neighbourhood and Kirkley Waterfront Development Brief. This work concluded there were no realistic alternative options to secure access to the site.

Development of the site is not ransomed by the need to relocate the Jeld Wen Playing Field site. Condition 46 of the planning permission for the Brooke Peninsula and Jeld Wen Playing fields site (DC/13/3482/OUT) does not require re-provision to take place prior to development, just submission of a plan to set out the approach to re-provision. Whilst it is appreciated there are concerns around delivery and viability of this site, the assumptions made with respect to delivery within this plan period are considered realistic. It remains a priority of the Council to proactively encourage delivery on this site. There is no evidence to support the deletion of 300 homes from the housing trajectory from this site.

In terms of housing on the Jeld Wen Factory part of the site, this is only supported on the Waveney Drive half of the site. The Council considers that employment development on the northern, waterfront parts of the site is most appropriate. This part of the wider allocation is sequentially less preferable in terms of flood risk. No robust evidence has been submitted to demonstrate the site is not viable or deliverable for employment use.

It is considered that the general balance on the site between housing and employment uses is correct. The Policy seeks to retain slipways on the Brooke Peninsula and retains 7.5 hectares of waterfront for employment.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.
Policy WLP2.5 East of England Park

Statutory Consultees

Historic England welcomed 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. They recommended that reference to the Conservation Area is made in either the supporting text or the policy.

Suffolk County Council stated that the allocation was unlikely to significantly impact on the highway.

Suffolk County Council noted development surface water could discharge into sea unrestricted but would have to size attenuation for tide lock scenario. They noted the site was in Tidal flood zone 2 and 3. They noted a combined Anglian Water sewer although ideally should separate surface water from this.

Parish and Town Councils

Gisleham Parish Council state that Lowestoft has great beaches and fine countryside surrounding the town and more emphasis to the leisure industry could be made in the plan. They added that 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.

Lowestoft Town Council urged an integrated approach to development in the Denes area that respects the natural biodiversity as well as the tourist and public demands. They added that greening the streets of Lowestoft would have visual and functional benefits including reducing the effects of climate change and reducing street clutter.

Other Organisations

Beccles and Bungay Cycle Strategy stated that 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. They welcomed the vision to enhance the area but would like to see cycle links improved from the west and the south.

Suffolk Wildlife Trust stated that the policy should recognise the site’s ecological value and ensure that this is protected and enhanced as part of any works at the site.

Developers/Landowners

No comments were made in response to this section/policy.
Members of the Public

A number of respondents stated that the caravan park should not be expanded in this location. It was suggested that existing caravans were a blot on the landscape.

The appropriateness of adding lighting to the section of the seawall north of Bird’s Eye was questioned. It was added that 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.

It was stated that Tingdene, who operate the caravan park should be persuaded to replace their fence with a post and rail fence.

It was suggested that a route through Bird’s Eye was needed to improve the connection between the High Street and Ness Point.

It was suggested that Birds Eye should be encouraged to reduce the visual impact of the factory on the area.

A discrepancy on the extent of the East of England park as shown on the map on page 45 compared to the map on page 47 was noted.

How these comments have been taken into account in the Final Draft Local Plan

Reference in the supporting text has been made to the North Lowestoft Conservation Area.

It is agreed that cycle links to the site should be improved. A number of measures to improve cycle links through the town have been identified in the Waveney Cycle Strategy, which is given weight in the infrastructure section of the Lowestoft strategy and in Policy WLP8.21 on Sustainable Transport.

The ecological value of the site has been referenced in the supporting text and a requirement for an ecological assessment has been added to the policy.

There are no proposals in the Local Plan to expand the caravan park in this location. Work on masterplanning the site will consider matters relating to lighting and fence treatments.

The discrepancy between the allocation site and the plan and the outline spatial objectives plan on page 45 of the document is because this higher level plan groups the allocation with the Sparrows Nest Gardens and Belle Vue Park.
A route through Birds Eye is not supported. Whilst this may provide a direct route to Ness Point it is not considered it would be the most attractive route given the industrial nature of the area. Therefore wayfinding measures will likely direct people to access the East of England Park from the north near Sparrows Nest Gardens and from the South near Hamilton Road.

Policy WLP2.6 Western End of Lake Lothing

Statutory Consultees

The Environment Agency supported the approach to flood risk on this site. They added that there will be a requirement for site specific flood risk assessments.

Suffolk County Council stated that improvements to South Elmham Terrace were required (surface and footways). They stated that the allocation should encourage sustainable route along south bank of Lake Lothing.

Suffolk County Council stated that the site is 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.

Suffolk County Council noted development surface water could discharge into Lake Lothing unrestricted but would have to size attenuation for tide lock scenario. They noted the site was in Tidal flood zone 2 and 3.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Building stated that they have discussed development opportunities in this area with landowners and found them not to be viable. They added that delivery is ransomed by the need to acquire additional land for vision splays and highway improvements. They raised concern that the identification of this area for housing effectively locks up housing numbers which are unlikely to come forward.
Members of the Public

Concern was raised about the lack of investment in the area and lack of progress on a flood barrier. Concern was raised about the state of the un-adopted access roads.

It was suggested that this area should concentrate on waterfront activities such as marine engineering, marine chandlers and servicing the commercial shipping and leisure boat activities.

Concern was raised about the impact of development on Crompton Road and Stanley Road. It was suggested that these streets were already congested with parked cars and increased traffic would increase noise and pollution. It was suggested that car park was needed between Crompton Road and Stanley Road for visitors to the Victoria Road Doctor’s Surgery.

How these comments have been taken into account in the Final Draft Local Plan

No changes to the Policy or supporting text are considered necessary.

Parts of the site are not ransomed and could potentially be delivered in the shorter term.

Plans for the strategic flood protection measures in Lowestoft are progressing and is expected to be in place by 2020.

The policy promotes maritime industrial uses.

No concerns have been raised by the Highway Authority with respect to Crompton Road and Stanley Road. The level of housing proposed in this area is unlikely to have a significant impact on congestion on these streets, given the central location of the site and the fact that the majority of the site is already in use. The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.
**Policy WLP2.7 Former Battery Green Car Park**

**Statutory Consultees**

Historic England noted that this site is opposite grade II St Margaret’s House and redevelopment of this site is an opportunity to improve its setting. They raised concern about the aspiration to create a landmark building. They added the current structure is imposing and unwelcoming and any replacement should aim to work with the surrounding area. They welcomed a commitment to an active frontage but added it would benefit from further refinement to achieve a positive outcome.

Suffolk County Council stated the site is accessed from the A47 trunk road and access needs to be considered according to end use.

Suffolk County Council noted that the site could utilise existing drainage to manage surface water.

**Parish and Town Councils**

No comments were made in response to this section/policy.

**Other Organisations**

Making Waves Together raised concern about the impact a multiplex cinema may have on local providers which run a cinema programme. They added that 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. They stated there needs to be a more attractive offer for national retailers and restaurants to invest in the town, both in terms of long-term planning and financial incentives.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

It was suggested that there should be an inquiry into why the car-park, which was built in 1982 should be in a state which requires demolition. It was stated that it was ridiculous to consider additional retail units, when it was difficult to fill existing premises in the town.

It was requested that there should be no social housing on the site.

There was support for using the site for entertainment and leisure uses. A replacement multi-storey car park was also suggested.
It was questioned why another cinema was needed in the town centre.

**How these comments have been taken into account in the Final Draft Local Plan**

Reference to the adjacent Grade II listed St Margaret’s House has been added in to the supporting text.

The design of the scheme will need to be in accordance with Policy WLP8.29 which requires consideration of the local context in terms of scale, height and massing.

The Policy aims to provide a flexible approach to the use of the site by supporting a range of town centre uses. The Retail and Leisure Needs Assessment 2016 has identified a need for all of these uses over the course of the plan period.

**Policy WLP2.8 Historic High Street and Scores Area**

**Statutory Consultees**

Historic England welcomed a policy on the Historic High Street and the Scores. They noted that the area is under threat from inappropriate development and poorly maintained buildings. They particularly welcomed the commitment to retaining and enhancing historic shop fronts, which are characteristic of the area. They noted that 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, the aspirations for the area, and how the historic environment is part of this. They added they would be happy to discuss further the aspirations for this area and how the policy and supporting text could be improved to achieve heritage-led regeneration of the area.

Suffolk County Council stated that the allocation was unlikely to significantly impact on the highway.

**Parish and Town Councils**

Lowestoft Town Council stated that business/retail space should be prioritised in heritage buildings.

**Other Organisations**

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that a route through Bird’s Eye was needed to improve the connection between the High Street and Ness Point.

It was stated that it was important to bring the Town Hall back in to use.

Concern was raised about the existing planning permission for a Burger King on the site. Reference was made to research linking takeaways in deprived areas to health inequality.

It was stated that some buildings in the High Street are outstanding enough to be explicitly mentioned, including nos 80, 55, 49 & 27. It was suggested that the Crown Hotel could serve as a restaurant again.

It was noted that most of the Score were in reasonable condition except Mariners Score and Crown Score where there were some broken walls and fly tipping.

How these comments have been taken into account in the Final Draft Local Plan

Policy on designated heritage assets is set out in the National Planning Policy Framework and it is not considered appropriate to replicate it in this policy. Instead the application of the National Planning Policy Framework has been referenced in the supporting text.

The level of detail in the supporting text is considered sufficient for the Local Plan.

The Policy provides protection of existing retail and business premises, including those within heritage buildings.

A route through Birds Eye is not supported. Whilst this may provide a direct route to Ness Point it is not considered it would be the most attractive route given the industrial nature of the area. Therefore wayfinding measures will likely direct people to access the East of England Park from the north near Sparrows Nest Gardens and from the South near Hamilton Road.

Policy WLP2.9 Inner Harbour Port Area

Statutory Consultees

Suffolk County Council stated that sustainable links should be provided.
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that this area should become a major recreational area including a multi-screen cinema, sports facilities, restaurants and bowling. It was suggested that this would take advantage of waterfront views and riverside walking areas.

It was suggested that the appearance of this area needed to be improved.

It was suggested that land on the South Quay should be utilised as a business park. It was suggested that North Quay should be used as the site for back up to river, road & rail trade.

How these comments have been taken into account in the Final Draft Local Plan

No changes to the Policy or supporting text are considered necessary.

Policy WLP8.21 on Sustainable Transport will encourage sustainable links to be provided as part of any development within this area. As this policy is more about protecting and managing existing uses, it is not considered necessary to refer to sustainable links in the policy. This area provides an important source of employment and is important to the local economy as a operational port. Therefore, redevelopment for leisure uses is not considered appropriate.

Policy WLP2.10 Oulton Broad District Shopping Centre

Statutory Consultees

The Broads Authority support the policy.

Suffolk County Council stated that the allocation was unlikely to significantly impact on the highway.
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that restrictions on the growth of takeaways and burger bars would have an effect on human health.

It was suggested that there was already a good assortment of cafes and restaurants. It was stated there was a lack of food retail premises such as butchers and delicatessens. Non-food retailing was considered to be lacking in terms of basic provisions for tourists visiting on boats. It was stated that the policies need to promote and encourage the increase of general retail, both food and non-food and the centre of Oulton Broad must be about more than just restaurants and cafes if it is to survive.

How these comments have been taken into account in the Final Draft Local Plan

The Policy has been amended to provide support for new retail development in the District Centre. The Policy also provides some protection from change of use for existing A1 retail units.

Policy WLP2.11 Kirkley District Shopping Centre

Statutory Consultees

Suffolk County Council stated that the allocation was unlikely to significantly impact on the highway.

Parish and Town Councils

Lowestoft Town Council stated that mixed-use development, including B1 office, A2 financial and professional services, housing and hotel should be supported in Kirkley District Shopping Centre. They stated that proposals for the change of use of ground floor retail units to community facilities should 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 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.

They added that drinking establishments and hot food takeaways should not accommodate more than 20% of the frontages. They added that 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.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

It was stated that the area is up and coming and very careful consideration should be given to what uses are allowed. It was suggested that the main negative aspect of the area was the number of homes in multiple occupation.

Concern was raised about anti-social behaviour in the area. It was suggested that this was associated with local rented accommodation.

**How these comments have been taken into account in the Final Draft Local Plan**

The Policy has been amended to provide support for new retail and other town centre use development in the District Centre. The Policy also provides some protection from change of use for existing A1 retail units and restricts change of use to A4 drinking establishments and A5 hot food takeaway uses.
Policy WLP2.12 – North Lowestoft Garden Village

Statutory Consultees

Anglian Water stated that the plan should make clear that there is a water treatment works to the north of the site, not a wastewater recycling centre as indicated by the plan. They added that 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 their operational asset.

The Environment Agency stated they would support the promotion of green infrastructure as part of the North Lowestoft Garden Village, although they would like to see the benefits of green infrastructure promoted more strongly. They added that 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.

The Broads Authority stated that the photos included were confusing. They added that it should be stated that the photos illustrate what a Garden Village could look like.

Great Yarmouth Borough Council were pleased to see that the extent of the allocation maintains a sizeable gap between the allocation and Hopton-on-Sea. They added that it was important that the proposed development does not undermine that strategic importance of the A47 and the planned improvements. They requested that this matter is explicitly addressed in the policy.

Highways England stated that while the A47 remains rural and high speed in character there would be a strong presumption against creating any additional junctions. However, they did not rule out redefining the character of this section to be more integrated with that of the urban sections through Lowestoft. They added the Plan needs to make clear this will need to be undertaken with careful planning and suitable package of measures to achieve it. They noted their 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. They added there are particular challenges in relation to how the A47 splits this site. They stated that the impact of the site on the operation of the nearby roundabout junctions needs to assessed and maintained at acceptable levels.

Suffolk County Council stated that as access would be from A47, Highways England would need to be consulted. They added that safe means of crossing the A47 was required to link the two sites, and that 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. They added that speed limit reduction may be desirable or essential depending on the design of the crossings and access points. They suggested there was some scope to remove existing sub-standard access from the A47 which would help mitigate the impacts of the scheme. They added that cycle and pedestrian access was 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.

Suffolk County Council stated that there should be reference made to archaeology work in the supporting text and in the policy to require an archaeological assessment to inform planning applications.

Suffolk County Council noted that the site is within 400m of a sewage treatment works and that proposals should not prejudice the works.

Suffolk County Council stated that there are pockets of surface water flooding across the site and a natural surface water flow route along the northern boundary of the site.

Parish and Town Councils

Corton Parish Council stated that they understand the need for housing and are not against the proposed plan for housing on the site. They questioned how much the input the Parish Council would have on the plans. They questioned what role the existing school and pavilion would have. They raised issues with access on to Corton Long Lane due to traffic associated with the nursery. They requested that they are advised on all future plans within their Parish boundary.

Oulton Parish Council raised concern that the development would cause an increase in traffic through their village. They stated that the paths through the village are narrow and pedestrian are at risk from being hit by HGVs. They requested that Oulton Street was narrowed in one location to avoid overtaking and limit HGVs.

Other Organisations

Beccles and Bungay Cycle Strategy stated that an essential part of this development would be a grade-separated pedestrian and cycle crossing over (or under) the A47. They added the primary school should be located close to this crossing to help achieve very high levels of walking and cycling to the school. They suggested a well designed subway with good visibility would be the best option.

Suffolk Preservation Society welcomed the inclusion of local shopping and leisure facilities only as they would not wish to see the regeneration of Lowestoft town centre to be prejudiced through out of town competition.

Suffolk Wildlife Trust noted that 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. The Trust stated that these further surveys were necessary to identify avoidance, mitigation and enhancement measures and should also be undertaken for the western part of the
site. They added that the policy should ensure ecological surveys are undertaken should any development come forward on the site. They added the policy should also secure ecological enhancements, as well as any required mitigation or compensation measures.

Developers/Landowners

ER (East Anglia) Ltd. stated that they strongly support the proposed allocation. They requested minor additions to 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. They stated that modest quantum of residential development along Blundeston Road would not prejudice the wider allocation and the provision of community facilities and the design principles of a Garden Village. They added this would help the site make a early contribution to the District’s housing supply.

Gladman Developments Ltd. state that the Local Plan should take into account the risks associated with the delivery of large scale schemes such as this one.

M J Edwards & Partners objected to the proposed allocation. They noted that access was a constraint. They raised concern that the requirement for a masterplan as part of a neighbourhood plan process, while necessary, will further delay the delivery of housing. They added the development and loss of farmland would have a devastating effect on the business. They noted that the existing road system was considered inadequate to support the development and a major investment in the roads system was required. They also raised concern about insufficient jobs and economic opportunity to support the development.

Suffolk County Council as the landowner of the site supported the allocation subject to the adoption of a masterplan, covering access, distribution issues etc, as per the draft plan. They noted that 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.

Members of the Public

Concern was raised that the scheme would not meet Garden City principles in terms of land value capture.

It was questioned why so many new homes were required.

It was considered that the development was too large, representing a 300% increase in the size of Corton. It was suggested that this scale of development would undermine the ambience of the village and won’t integrate into the existing village, spoiling the identity of Corton and reducing the vitality of the village.
Concern was raised that the development would de-value existing properties.

Concern was raised that views from private property and also public view point of the countryside would be lost.

Concern was raised that the development would result in the loss of grade 2 agricultural land.

It was noted that the site covered land previously occupied by the medieval hamlet and church of Thorpe and development would destroy this.

It was stated that the development would deprive residents of Corton of rural walks.

Concern was raised about the impact on utility infrastructure, particularly water pressure. It was noted Corton already suffers from poor water pressure.

Concern as raised that any affordable homes would not remain affordable in perpetuity.

It was stated that the site was too near the sewerage works and there would be an amenity issue associated with the smell. It was suggested that the sewerage treatment works was constructed in its current location in order to avoid being close to residential properties.

Concern was raised about the impact on the landscape which was considered to be very attractive.

Concern as raised about impact on wildlife. It was noted that the site provided a habitat for tawny owls, barn owls, bats, fallow deer, buzzard, otter, sparrow hawk, cuckoo, and woodpecker, together with other common species.

Concern was raised about the impact on traffic congestion, particularly congestion along Corton Long Lane associated with parked cars outside the Kindergarden. Related to this was concern about increase in accidents associated with the poor access and increase in traffic. Concern was also expressed about the impact of using Corton Long Lane during the construction phases.

Concern was expressed about the A47 cutting the site in half. It was suggested that just one half of the site could be developed. Slipways were requested as a means of access on to the A47.

Concern was raised about the introduction of another roundabout on the A47 and it was suggested the site would be better served from the existing roundabouts, together with a pedestrian and cycle bridge over the A47. It was suggested that the western part of the site could be accessed from Gorleston Road.
Concern was raised that the distance from the site to the town centre would discourage healthier travel options such as walking and cycling.

It was noted that drainage is an issue in Corton which contributes towards coastal erosion. It was suggested that development of this site may add to the current problems particularly if trees are removed.

It was stated that development could have a negative impact on tourism.

Concern was raised on the impact on doctor surgeries, dentists and hospitals.

It was suggested that the increased population could result in an increase in crime. Concern was expressed whether the police would be able to cope with the scale of the population increase associated with the development.

It was stated there was a lack of jobs and economic potential to support the increase in housing.

Concern was raised about the capacity of the existing school in Corton.

Concern was raised that following the completion of the Garden Village, bus services will be diverted away from Corton to the new village as it will have a larger population.

It was suggested that rather than creating a new village it would be better to expand each village with sympathetic additions. This would spread impact and would allow development to connect into existing bus routes.

It was suggested that brownfield land should be developed before greenfield.

It was suggested that more development could be located to the south of the town to avoid the coalescence with Great Yarmouth. It was suggested that the two towns could work together to prepare a strategy.

It was suggested that the Council bring back empty properties into use rather than developing new houses on the site.

It was noted that the development provides an opportunity to deliver a new cycle link towards Great Yarmouth making use of the old railway line.

It was stated that walking and cycling should be seen as the main method of travel within the site.

Concern was raised that the allocation covered properties on Taylors Farm.
It was stated that the site should not be called ‘North Lowestoft Garden Village’ when the site is within Corton Parish and has poor links to Lowestoft.

There was support for the creation of more sheltered housing and dementia friendly design principles.

It was suggested that if the scheme is carried out with due sensitivity and imagination, it could make a positive contribution to the area. It was suggested that development should be non-pastiche, stereotype-free styles of architecture, thoughtful layout and grouping, and ecologically sound use of open space. It was suggested that planting should be native, deciduous hardwoods (not ornamentals) with copse and spinney technique applied. It was suggested that as some of the development will occupy land formerly belonging to the medieval hamlet of Thorpe, the name should be used in whatever title is chosen to identify the garden village.

How these comments have been taken into account in the Final Draft Local Plan

The part of the site to the west of the A47 has been removed from the allocation. Instead the allocation has been extended to the slightly to the north to Stirrups Lane. This change resolves some of the issues around access and the issue of severance by the trunk road and potential impact on the strategic function of the A47. It also reduces the landscape impact as the east side of the site has a greater capacity for development and is more contained in the landscape between detracting features. Expanding the site to the north will have limited impact on coalescence and there is limited visual connectivity between Stirrups Lane and the edge of Hopton.

Reference to the wastewater recycling centre have been changed to water treatment works. An additional requirement has been added to the policy to require the masterplan to demonstrate no adverse effect on the operation of the works.

The photos have been removed from the document.

A requirement for an ecological assessment to support the masterplan has been added to the policy.

Reference to a cycle link between Hopton and Corton has been added to the supporting text and has been added to the infrastructure delivery plan.

Corton Parish Council will continue to be consulted on plans as they progress.

Transport modelling undertaken as detailed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) indicates the development will not result in an increase in traffic through Oulton Village and will not result in significant impacts on
the network elsewhere. Localised issues on Corton Long Lane and elsewhere in the vicinity of the site will be assessed through a transport assessment associated with the planning application. Traffic calming measures in Oulton Street would need to be considered through detailed transport assessment associated with development on the land allocated north of Union Lane and between Union Lane and Hall Lane (Policies WLP2.14 and WLP2.15).

The scale of retail development on the site will be commemorate with the scale of development and is likely to take the form of a local shopping centre which would not compete with the town centre. Reference to the archaeological potential of the site has been added to the supporting text including reference to the possible location of the former village of Thorpe.

Reference has been made to the provision of a cycle link between Hopton and Corton.

Whilst it is acknowledged that the site falls within the Parish of Corton, it is considered a stand-alone development resulting in a new settlement and therefore would not result in an increase in the size of Corton as a village.

Issues relating to private views and value of property are not material planning considerations which can be taken into account in the preparation of the Local Plan.

It is acknowledged that the development will result in the loss of high grade agricultural land. However, many alternative options would have the same effect. On balance the benefits of the development are considered significant enough to outweigh the loss of high grade agricultural land.

The development will need to include green infrastructure provision and provide new rights of way. This should help ensure existing residents and new residents till have access to the countryside.

No concerns have been raised by Essex and Suffolk Water with respect to water pressure.

The policy requires the masterplan to have regard to water treatment works and ensure new development does not impact upon its operations. If necessary there is scope within the site to ensure no residential development occurs within 400m of the works. Anglian Water usually raise concerns if residential development is delivered within 400m of the works as this is where odour issues can start to arise.

The site has a similar accessibility to the town centre as other alternative sites on the edge of Lowestoft.

Drainage issues will be addressed through the masterplanning exercise and in more detail at the planning application stage. There is no evidence to suggest the are any issues which are insurmountable.
There is no evidence to suggest that development will have a negative impact on tourism.

The infrastructure delivery plan in the Local Plan identifies that there will need to be improvements to police infrastructure to support growth. These will be funded through developer contributions.

A new school will be provided on the site which will mitigate any impacts on the existing primary school in Corton.

**Policy WLP2.13 – Land North of Union Lane, Oulton**

**Statutory Consultees**

The Broads Authority noted that the allocation is close to the Broads and would extend the built form of Lowestoft towards the Broads.

The Environment Agency supported the 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 noted that the site incorporates the location of the former Oulton Workhouse. They noted, that whilst there are no remaining buildings, the site includes a burial ground. They noted that the policy and supporting text states that development should be avoided on the burial ground.

Suffolk County Council stated that main vehicular access should be from Parkhill plus additional sustainable links.

Suffolk County Council stated that archaeology assessment should be carried out prior to planning permission being granted rather than as a condition. They also requested the policy to be amended to read: ‘Development should avoid impacts on and enhance the historic burial ground to the northwest of the site’.

Suffolk County Council stated that surface water flood risk from an ordinary watercourse traverses through the site.

**Parish and Town Councils**

Oulton Parish Council objected to the site. They stated that Oulton Village has a varied and interesting past. They noted the site has historic value and the burial site should be returned to its original state to give respect to peoples loved ones. They stated that the site is surrounded by green belt. They added that the proposed density was too high and not in keeping with the density and type of housing already existing in the original Village. They stated that if the allocation is carried forward it will destroy the original village.
Other Organisations

Suffolk Wildlife Trust stated that the site was subject to a wildlife audit in 2017 which recommended that a number of further surveys were required to establish the site’s ecological value. They noted that the policy requires the submission of an ecological assessment. They added that development should also be required to 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.

Developers/Landowners

Oldman Homes strongly supported the allocation. They stated that 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. They added that the site forms a logical extension to the built up area, being directly adjacent to the settlement boundary. They added that part of the site constitutes previously developed land and in line with the National Planning Policy Framework ensure effective reuse of previously developed land. They stated that the site is not located in a sensitive landscape setting and, subject to appropriate design / landscaping measures, can be incorporated into the urban area. They stated that the site can be developed in a way to ensure there is not impact on a nearby County Wildlife Site or nearby listed buildings. They added the site is suitable in terms of highways and accessibility and is capable of incorporating measures to encourage travel by non-car modes. They added it will also provide an opportunity to enhance infrastructure, such as the pavement on Parkhill, to the benefit of the wider community. They stated that development could begin within five years subject to allocation and planning permission and that development is considered viable taking into account affordable housing provision and CIL contributions. Notwithstanding the above, they requested a number of minor amendments to the policy. They stated they do not consider the site to be rural in character and therefore the reduced density of 25 dwellings per hectare is not justified. They stated that in order to ensure efficient use of land it was suggested that 30 dwellings per hectare would be appropriate with lower density on the edges and higher densities in the middle of the site. It was suggested that the provision of open space on the site could be reduced by making improvements to open space elsewhere in the locality. They requested changes to the policy to reflect these issues. They noted this would allow the construction of 170 dwellings on the site.

Members of the Public

The main concerns raised related to the impacts on traffic congestion and road safety. It was noted there was significant congestion at Oulton Broad Roundabout where queues can be 20 minutes long. It was noted there was an HGV problem on Somerleyton Road.
The narrowness of Oulton Street and pathways and the associated safety concerns with respect to HGVs and other traffic was noted. Safety concerns were also noted at Hall Lane, Dunstan Drive and Sands Lane and Union Lane. It was stated that Parkhill was an accident blackspot, with frequent speeding drivers and the roads running north toward Great Yarmouth were dangerous. Speeding concerns were also identified along Oulton Street.

Concern was raised about the cumulative increase in traffic along Parkhill associated with the North Lowestoft Garden Village Proposal and the Woods Meadow development. Concern was raised that traffic calming measures and HGV weight limit have not been implemented. It was suggested that the pedestrian crossing on Parkhill needed be made more visible.

Concern was raised that air pollution associated with cars waiting to turn out of the access road on to Parkhill.

Concern was raised about the impact on other infrastructure including schools and GP surgeries. It was noted that there was no guarantee that GPs will staff a new surgery.

It was noted that there was a historical burial site associated with the workhouse and that it should not be disturbed or harmed.

Concern was raised about the impact on wildlife.

It was noted that there were existing noise pollution associated with Parkhill Hotel. It was suggested that these would get worse with more residents in the vicinity.

Concern was raised about the impact of the Local Plan on the Neighbourhood Plan. It was suggested that the Neighbourhood Plan should be completed and use that to highlight the areas which should be developed.

It was suggested that the level of development would mean that Oulton would become a continuation of Lowestoft.

Concern was raised about the potential loss of privacy for people bordering the site.

Concern as expressed about the drainage issues and the capacity of the sewerage system. It was noted that the system is regularly becoming blocked.
How these comments have been taken into account in the Final Draft Local Plan

The Policy and supporting text have been amended to provide greater reference to the burial ground on the site and the need to avoid development on this part of the together with a requirement to enhance the site.

It is agreed that a density of 30 dwellings per hectare would be a more appropriate density for this site. Although the site has a semi-rural character, there are local examples of higher density housing along Oulton Street (60 dwellings per hectare). The site is of a scale to accommodate higher densities in the eastern and southern parts of the site, allowing for lower densities on the northern and western edges of the site to fit in with the more rural character of that location. As such an average density of 30 dwellings per hectare is considered appropriate. However, as a result of the stronger reference to the burial area, it is considered that the capacity of this site for development is 150 homes rather than 170 as argued by Oldman Homes.

Reference has been made to the ecological assessments undertaken by Suffolk Wildlife Trust. It is not considered necessary for the policy to include provisions to protect any habitats of ecological value on the site and measures to mitigate or compensate any impacts and measures to enhance the site’s value for wildlife. Policy WLP8.34 - Biodiversity requires this.

Whilst the site is in reasonable close proximity to the Broads, it cannot be seen or experienced from the Broads and would have no demonstrable impact on the Broads or its setting.

It is not considered appropriate to reduce the amount of open space required on the site. There are no Local Equipped Areas for Play within 400m walking distance from the majority of the site. Therefore a new local equipped area for play is required on the site. Fields in Trust recommend that a Local Equipped Area for Play measure 20m by 20m with a 20m buffer between the activity zone and dwellings. Therefore a space of 60m by 60m would be preferable equating to approximately 0.4 hectares of open space.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

There is no evidence of local air quality concerns in the Oulton Street area.

There have been seven road accidents on Parkhill in the last five years. None of these have involved pedestrian casualties. Whilst safety is a concern it is considered that any issues can be mitigated. A detailed transport assessment associated with a planning application will assess safety in more detail.
and identify any necessary mitigation. The extension of the footpath along Parkhill will help to reduce speeds.

There is unlikely to be any noise issues affecting the site from the Parkhill Hotel. The site is some distance and there is already a reasonable amount of screening in the form of buildings and vegetation between the site and the hotel.

The Council’s Local Plan needs to set out the strategic matters concerning growth and development for the Waveney District. Importantly, it must set out a plan for meeting objectively assessed needs for housing and ensuring a rolling five year supply of housing. This means there is a necessity to identify sites for development within the plan in all parts of the District, irrespective of whether a Neighbourhood Plan is under preparation or not. If the Local Plan does not identify sufficient land to meet a five year supply, there is a significant risk that speculative development could occur in advance of Neighbourhood Plans coming forward.

Whilst Oulton is a distinct community with its own Parish Council, it is part of the continuous built-up, urban area of Lowestoft and already contains many examples of suburban housing. Lowestoft, as the main town in the District is justified in taking the majority of the District’s growth. However, there is limited suitable and available land within the Parish of Lowestoft to accommodate this level of growth. Therefore it is necessary that a proportion of the growth of Lowestoft takes places in the Parishes of Oulton, Corton, Carlton Colville and Gisleham.

Policy WLP2.14 Land Between Hall Lane and Union Lane, Oulton

Statutory Consultees

The Environment Agency stated that they would support the retention of natural features including trees and hedgerows in the layout of any future development at the site.

Historic England noted the requirement for 1 hectare of the site to 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. However, they stated that the proposed allocation would have a negative impact on the setting of the House and would result in harm to its significance. They therefore, find the allocation unsound. They stated that the building would have had some status and significance. They added that the western side of the building which faces the allocation is still recognisable as a building of the 16th century which makes the house's setting on this side of particular importance. They stated 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. They added that the north-side of Hall Lane has not been
developed to date and therefore beyond the rear (western) boundary of the Manor House’s garden open fields can still be seen. They added that 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. They noted 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. They noted that the policy requires the buildings fronting onto the ‘open space’ on Hall Lane would be detached and spaced as existing buildings to the south of Hall Lane. They stated that the development on the south-side of Hall Lane is inappropriate in itself and would be even less appropriate closer to the Manor House. They added the density of the development would require vehicular access in a way that does not reflect traditional forms of building. They stated that a Heritage Impact Assessment should be prepared to understand whether development could take place on the site, and if so what type and quantum.

Suffolk County Council stated that main vehicular access should be from Hall Lane plus additional sustainable links.

Suffolk County Council welcomed the consideration of the impact on the listed manor house. However, they suggested the open space provision, currently set at c1ha, should also be informed by specific assessments of impacts on the setting to determine development parameters.

Suffolk County Council stated that surface water flood risk from an ordinary watercourse traverses through the site.

Parish and Town Councils

Oulton Parish Council objected to the site. They stated that Oulton Village has a varied and interesting past. They noted the Grade II* Manor House. They stated that the site is in the green belt. They added that the proposed density was too high and not in keeping with the density and type of housing already existing in the original Village. They stated that if the allocation is carried forward it will destroy the original village.

Other Organisations

Suffolk Preservation Society object to the allocation as they consider it will harm the setting of the grade II* Manor House. They stated that the provision of a 1 hectare buffer to the west of the asset is insufficient to safeguard its rural context. They recommended that the number of dwellings is substantially reduced and that the policy makes specific reference to the heritage asset.

Suffolk Wildlife Trust stated that the site has not been subject to wildlife audit and therefore its current ecological value has not been established. They stated that although the policy requested an
ecological assessment and the retention of natural features, with a baseline ecological assessment it cannot be confirmed that the site is appropriate for allocation for development. They recommended that further ecological assessment was undertaken. They stated that 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.

Developers/Landowners

Sharon Corbin strongly supported the proposed allocation. They stated that 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. They added that the site forms a logical extension to the built up area, being directly adjacent to the settlement boundary. They noted that the site is not within a sensitive landscape and subject to appropriate landscaping and design could be incorporated into the urban area. They considered that the proposed development of the site is not constrained by environmental or heritage assets. They added a buffer to the south would ensure heritage assets are not harmed by the proposed development. They added the site is suitable in terms of highways and accessibility and is capable of incorporating measures to encourage travel by non-car modes. They stated that whilst the site is within two separate ownerships development can be delivered immediately. They added the development is considered viable taking into account affordable housing provision and CIL contributions. However, they requested some changes to the policy. They stated that work undertaken by Canham Consulting indicated that an alternative access could be provided to the north of the site. They stated that this would have the benefit of allowing a phased approach to development ensuring that the delivery of residential units on the northern part of the site is not delayed. They suggested that the policy should be amended to allow access via the north of the site.

Badger Building supported the allocation. They stated that 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. They raised some reservations about the preservation of hedgerows within the site layout. They recognised the ecological case for this but stated it can often make for awkward boundary arrangements between properties.

Members of the Public

The main concerns raised related to the impacts on traffic congestion and road safety. It was suggested that Hall Lane could resemble an A road, following completion of development. Speeding concerns were noted on Hall Lane which was considered dangerous due to bends in the road. Concern was raised about the cumulative effects of the development together with the Blundeston Prison development and the Woods Meadow development. It was noted there was significant congestion at Oulton Broad Roundabout where queues can be 20 minutes long. It was noted there
was an HGV problem on Somerleyton Road. The narrowness of Oulton Street and pathways and the associated safety concerns with respect to HGVs and other traffic was noted. Safety concerns were also noted at Hall Lane, Dunstan Drive and Sands Lane and Union Lane. It was stated that Parkhill was an accident blackspot, with frequent speeding drivers and the roads running north toward Great Yarmouth were dangerous. Speeding concerns were also identified along Oulton Street.

It was stated that Parkhill was an accident blackspot, with frequent speeding drivers and the roads running north toward Great Yarmouth were dangerous. Speeding concerns were also identified along Oulton Street.

Concern was raised about the cumulative increase in traffic along Parkhill associated with the North Lowestoft Garden Village Proposal and the Woods Meadow development. Concern was raised that traffic calming measures and HGV weight limit have not been implemented. It was suggested that the pedestrian crossing on Parkhill needed be made more visible.

Concern was raised about the lack of a footpath along Hall Lane.

It was suggested no development should take place in Oulton until the effects of the Woods Meadow development had been ascertained.

Concern was raised about the impact on other infrastructure including schools and GP surgeries. It was stated that local schools are at capacity and there is difficulty recruiting teachers. It was noted that there was no guarantee that GPs will staff a new surgery. It was suggested there were very few local shops within Oulton village and nearby supermarkets were already overcrowded and overused.

It was stated that the electricity and telephone infrastructure in the locality was poor and new development would make it worse.

Concern was raised about the impact on the grade II* listed Manor House.

Concern was expressed about the impact on equestrian activities.

Concern was raised about the impact of the Local Plan on the Neighbourhood Plan. It was suggested that the Neighbourhood Plan should be completed and use that to highlight the areas which should be developed.

It was stated that 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. It was suggested that development of the site would be contrary to the aims identified in the Landscape Character Assessment for this landscape area.
Issue of flooding on Hall Lane and Union Lane were noted. It was noted that development of the site could make matters worse. It was stated that the site is frequently waterlogged and boggy and new development could significantly increase surface water discharge compromising local ditches. It was suggested there could be an increased risk of subsidence.

It was noted that the area does not benefit from mains drainage, and the installation of mains drainage would cause significant disruption.

Concern was raised about the impact on wildlife. The presence of bats, owls, deer, foxes and harrier hawks and a rookery were noted.

It was suggested that brownfield sites should take preference over greenfield sites.

Concern was raised that the density of development was too high. It was questioned why sites in Blundeston had a much lower density and were being phased behind the delivery of the Blundeston Prison site, whilst the sites in Oulton were not phased behind the Woods Meadow site. It was also questioned why Kessingland, which was a similar size to Oulton was allocated significantly less development as they had a completed Neighbourhood Plan.

It was suggested that the level of development would mean that Oulton would become a continuation of Lowestoft.

It was stated that the trees surrounding the site should be protected.

Concern was raised about loss of private views.

Concern was raised about the potential loss of privacy for people bordering the site.

It was questioned where the jobs would come from to support the new development.

Concern was raised about any access, vehicular, pedestrian or cycle on to Union Lane. It was stated that the road is extremely narrow and has no pavements.

**How these comments have been taken into account in the Final Draft Local Plan**

A Heritage Impact Assessment has been undertaken to understand the potential impact on the setting of the Grade II* listed Manor House. This concluded that the paddock field to the south of the site should be left entirely undeveloped. As such this area has been removed from the allocation.
With the exception of the field boundaries which include hedgerows and mature trees, which the policy seeks to retain, there are no natural features on the site which would question the overall suitability of the site for development. The policy requires an ecological assessment to be undertaken prior to planning permission being granted. This assessment will identify any habitats which need to be retained within the development and any other mitigation necessary. Access from Union Lane is not considered suitable due to the lack of footways on the street. It is not considered feasible to extend the footway along Union Lane to due to numerous parcels of third party land.

Although the site is made up of a number of landowners, the open space requirement is for the whole site. It is not considered necessary to make this explicit in the policy.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

There have been six road accidents on the Hall Lane/Oulton Street junction in the last five years and further accident on the B1074 north of Laurel Farm. None of these have involved pedestrian casualties. Whilst safety is a concern it is considered that any issues can be mitigated. A detailed transport assessment associated with a planning application will assess safety in more detail and identify any necessary mitigation. The extension of the footpath along Parkhill associated with the North of Union Lane site (Policy WLP2.14) will help to reduce speeds. A footpath will also be extended along Hall Lane.

It is considered that there is no justification for holding back development until Woods Meadow has been delivered. The evidence base studies which support the Local plan suggest that development is suitable in this location cumulatively with the Woods Meadow development.

To mitigate the impact on the listed building it will be necessary to retain the paddock. Therefore there shouldn’t be any impact on equestrian activities.

Only a small part of Hall Lane is currently at risk of surface water flooding. The risk is considered to be low. Any development will be required to provide sustainable drainage systems to mitigate the risk of flooding from surface water run-off.

All suitable and available brownfield sites in the District have either been allocated for development in this Local Plan or already benefit from planning permission. However, even with these sites identified for development there is still a need for greenfield sites to meet development needs.
A density of 30 dwellings per hectare is considered consistent with the surrounding character.

Issues relating to privacy and outlook will be managed at the detailed planning application stage in line with Policy WLP8.29 on Design.

The Council’s Local Plan needs to set out the strategic matters concerning growth and development for the Waveney District. Importantly, it must set out a plan for meeting objectively assessed needs for housing and ensuring a rolling five year supply of housing. This means there is a necessity to identify sites for development within the plan in all parts of the District, irrespective of whether a Neighbourhood Plan is under preparation or not. If the Local Plan does not identify sufficient land to meet a five year supply, there is a significant risk that speculative development could occur in advance of Neighbourhood Plans coming forward.

Whilst Oulton is a distinct community with its own Parish Council, it is part of the continuous built-up, urban area of Lowestoft. Lowestoft, as the main town in the District is justified in taking the majority of the District’s growth. However, for this to occur the growth has to occur in the Parishes where there is undeveloped land including Oulton, Carlton Colville and Corton.

Policy WLP2.15 – Land South of the Street, Carlton Colville/Gisleham

Statutory Consultees

Historic England identified that there was a scheduled monument on the site known as ‘Moated Site 200m south west of Bell Farm’. They noted that 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. They stated that any development that includes and is within the setting of a rural moated site is therefore likely to have an impact upon that significance. They stated that the proposed development would remove the remaining rural context and setting for the monument. They recommended that a heritage impact assessment is undertaken 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. Without this evidence they do not believe the evidence is there to justify the inclusion of this site allocation.

Suffolk County Council stated that the site has the ability to provide a solution to the existing traffic problems at the Primary School. They noted potential for permeability with the existing residential area. They stated that existing public rights of way could utilised and enhanced and opportunities should be sought to link to WLP2.16. They added that the site masterplan should ensure connectivity for sustainable modes and avoid the major access road forming a barrier to interaction between zones.
Suffolk County Council stated that the policy and supporting text needs to make reference to the scheduled monument on the site. They stated there should be a requirement for detailed assessment of development impacts on the setting of the monument, which may affect the illustrative masterplan. They noted that references to below ground archaeological remains are sound and should remain as they are.

Suffolk County Council stated 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. They added that 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.

Suffolk County Council stated that 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. They noted 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. They suggested the following worded is included in the policy: ‘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.’ They also proposed an additional point: ‘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 Council stated that the majority of water from the site will eventually discharge into the Kirkley Stream which is a highly vulnerable watercourse. They 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. They added that SuDS should be utilised to discharge surface water at source.

Parish and Town Councils

Carlton Colville Town Council stated that the site off of Bell Farm does not offer sufficient opportunities, nor access to work or leisure activities. They stated that The Street is not wide enough and there are no opportunities to widen it. They added that the site is too near Kirkley Stream in terms of ecology. They stated that the community hub aspect could be accommodated in existing facilities. They stated that the car park area would add to difficulties already experienced on this junction. They stated that the Town Council already provides allotment spaces for its residents and new allotments would generate increase traffic from South Lowestoft. They stated that there was already a care home in close proximity to the site. They added the site does not provide good access.
to employment areas. They stated that a preferable site would be site 179 known as Eades Farm, Beccles Road. They stated that this site has good access on to the A146 with good links to Lowestoft, Beccles and Norwich. They stated there would be no requirement for the Country Park because the site is adjacent the proposed Oakes Farm sport and leisure site. They believed the site would generate the same benefits as the WLP2.15 site. They suggested Eades Farm 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. They noted that following an open day attended by 70 residents, several of the residents expressed the same view as the Town Council.

Gisleham Parish Council stated that they thought the area was unsuitable for the level of development proposed. Whilst they recognise that the town has to grow on a north-site axis, they raised concern that the development is on high quality agricultural land which is essential to provide food resource for both local and national use. They stated that 800 homes on this land would put a significant strain on the country roads to the south of the site. They added that Carlton Colville Primary School has sufficient land within its boundary to enable improved parking on its site, without utilising valuable farm land. They also raised issues with flooding, reduction in wildlife habitat, pressure on road networks and pressure on facilities such as doctor’s surgeries.

Other Organisations

Suffolk Wildlife Trust stated that the site has not been subject to wildlife audit and therefore its current ecological value has not been established. They stated that although the policy requested an ecological assessment and the retention of natural features, with a baseline ecological assessment it cannot be confirmed that the site is appropriate for allocation for development. They recommended that further ecological assessment was undertaken. They stated that 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.

Developers/Landowners

Badger Building supported the allocation. They had 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 Community Infrastructure Levy. They raised concern about the impact on cash flow from the early delivery of the community centre and country park. They indicated that early discussions between the Council, landowner and developer would be needed to bring the site forward.

Gladman Developments Ltd. state that the Local Plan should take into account the risks associated with the delivery of large scale schemes such as this one.
R G Meadows & Son supported the allocation and indicated that early delivery was possible as the site is in single ownership. They indicated a number of possible changes to the indicative masterplan through the submission of two masterplan options. In one option they suggested that instead of providing a new primary school, the existing primary school could be expanded upon site. The alternative option still proposed a new primary school but located slightly to the south to ensure the school is not within the flood zone. They argued that a country park was not necessary in this location. They stated that with development to the north, east and west, a country park in this location would not exhibit a sense of countryside environment. They also argued that the Area of Outstanding Natural Beauty was only 1 mile away and the Norfolk and Suffolk Broads 2 miles from the site indicating good access to natural space. Nevertheless they indicated there should still be significant amounts of open space and landscaping on the site as indicated on their masterplan options. They stated they supported pedestrian and cycle accesses from Ullswater, Shaw Avenue and Low Farm Drive but they did not have control over these accesses. With respect to the requirement for the car park for the community centre and existing school, they said that this should be made more flexible as the exact location of these will not be determined until detailed masterplanning had been undertaken. They raised issue with the term ‘early’ with respect to delivery of the community centre, country park and car park as it wasn’t precise. They also raised concern with the term detailed, with respect to the masterplanning which it would be required to involve the community in. They also noted that there was a successful horse-riding and livery business located on the site and suggested the policy should have a criterion to relocate the business to the south of the site. They added they would like a criterion indicating that viability should not prevent the development from coming forward.

**Members of the Public**

There was support for the cycling proposals of the allocation, particularly a safe cycling and walking route to the school as an alternative to Rushmere Road. It was suggested that 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).

Concern was raised what would happen to existing community buildings if a new hub is developed.

Concern was raised about the loss of high grade agricultural land.

People adjacent to site raised concerns about potential loss of privacy.

Concern was raised about the potential impact on property prices, particularly if housing association homes are built.

It was suggested there was a lack of jobs to support the new housing development.
It was noted that there was a flood plain to the north of the site. Concern was raised about the impact on surface water drainage. It was suggested that moving the country park to the north of the site would help mitigate this.

It was questioned whether flood mitigation would mitigate both existing issues but also issues caused by the new development.

Concerns that the sewerage system is at capacity and that Anglian Water have to frequently unblock the existing sewers along The Street.

It was noted that there was not enough consideration of bridleways.

Concern was raised about the Impact on social infrastructure such as doctor’s surgeries and schools.

Concern was raised about the impact on congestion. It was suggested that this made the allocation contrary to the Suffolk Local Transport Plan. It was stated that parked cars on the Street meant there was regular congestion and safety issues. Concern was raised about the lack of a footpath on the north side of the Street in the vicinity of the Mardle.

Congestion at Bloodmoor Roundabout was also noted. It was suggested that access would be better from Shaw Avenue or Low Farm Drive which would keep traffic out of the village centre. It was suggested that a road link should be provided directly to the A12. It was suggested this would also reduce impact on Bloodmoor Roundabout. It was also suggested that there is provision of a road between WLP2.15 and WLP2.16 for local traffic moving between the residential area and the employment area. It was suggested this would reduce the congestion experienced where the A12 meets the A1145.

It was suggested that the access roads shown on the indicative masterplan were too close together. Not on a major road connection increasing the need to travel. Impact on the Street.

It was suggested that parking should be provided for the new school as well as the old school. More development to the north where there is more jobs and greater potential for economic development.

Concern was raised that the plan does not identify impact on the scheduled monument. It was suggested that thee development would negatively impact on the monument.

Concern as raised by some people that they would lose their private view over the fields.

Concern as raised over the impact on wildlife.
It was noted that the development would increase light pollution in the area.

It was stated that long views towards Gisleham Church (grade I listed) would be disrupted.

It was stated that the development was not a logical extension. It was suggested there were three hubs to Carlton Colville all with access on to major roads. It was stated that this development would create a forth hub without a direct link to main access roads, jobs and infrastructure.

It was suggested that the landscape sensitivity is high, including natural ponds, flood plains, hedgerows and trees, with sweeping views.

It was suggested that the community hub should be located more centrally to the existing community.

It was suggested that the new primary school would have the same problem as the existing primary school with increased school traffic going through the old village centre.

Concern raised that care provision on the site would further increase traffic. It was suggested that this would be better located in central or north Lowestoft which has better access to support provision.

It was suggested that 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 in line with the Suffolk Nature Strategy.

It was suggested that the Country Park should be on the northern edge of the development which would have the advantage of increasing accessibility to the existing community, linking in with the flood plain, provide a future opportunity for a link to the industrial site to the east. It would also provide a buffer between new housing and existing housing.

It was suggested that the detailed masterplan should be accompanied by a biodiversity assessment.

It was stated that the development should be designed to complement and blend in with the old village rather than being another faceless, overcrowded, red brick estate.

It was requested that the plan clarifies that there will be no additional development in the Carlton Colville area for the next 20 years if this development goes ahead.
It was noted the scheme conflicts with the Suffolk Design Guide which states a major access road can only serve up to 300 dwellings.

It was suggested that other smaller sites around the town would have less of an impact. It was suggested that land to the west of Beccles Road would be more appropriate.

**How these comments have been taken into account in the Final Draft Local Plan**

A Heritage Impact Assessment has been undertaken to understand the potential impact on the setting of the scheduled monument. This has concluded that retaining an open area to the west of the site will mitigate any harm to the setting of the monument as well as the setting of the Grade I listed Holy Trinity Church Gisleham. As such the policy and supporting text has been changed to reflect this together with the illustrative masterplan.

Reference to the Minerals Consultation Area has been added to the supporting text.

The policy and supporting text have been amended to better reflect the Lowestoft Flood Risk Management Project.

The Street is considered a suitable access road and the Suffolk County Council Highway Authority have raised no concerns. Should a detailed transport assessment indicate a need to remove car parking from The Street to accommodate the increased traffic flows, part of the site could be used to provide off-street parking for existing residents. The supporting text to the policy has been amended to reflect this.

With the exception of the field boundaries which include dikes, hedgerows and mature trees, there are no natural features on the site which would question the overall suitability of the site for development. The policy has been amended to require an ecological assessment to be undertaken prior to planning permission being granted. This assessment will identify any habitats which need to be retained within the development and any other mitigation necessary. The policy has also been amended to require the retention of natural features where possible. The development of the site, together with the flood risk mitigation proposals provide an opportunity to enhance the ecology of the site.

Given that Carlton Colville Town Council have expressed a request for the community hub to be located elsewhere, this has been removed from the policy.

It is not considered that the alternative site Eades Farm (site 179) is preferable. The site currently has a poor relationship with the existing built-up area of Lowestoft and Carlton Colville. Parts are closer to Beccles Town Centre than Lowestoft Town Centre which could divert custom away from Lowestoft Town Centre. The site also has poor connections to existing employment areas. The site
would not generate the same benefits as this site, including addressing traffic issues at the primary school and mitigating flood risk.

Viability is challenging on this site. The Whole Plan Viability Study (2018) indicates that the site is viable with 20% affordable housing (in line with the rest of Lowestoft), £10 per sqm Community Infrastructure Levy and Section 1016 contributions of up to £7,500 per dwelling to deliver on-site infrastructure and any highway improvements. However, to achieve this it is necessary to increase the density to 35 dwellings per hectare which means the allocation has been increased to 900 dwellings. Consequential amendments have been made to the text to reflect this.

A Country Park is considered essential in this location, both to mitigate the impact on the setting of the Scheduled Monument and the Grade I listed church at Gisleham, as well as to provide a semi-natural area for recreation which will help avoid impacts on nearby protected habitats. The policy has been amended to require the relocation of the horse-riding business to elsewhere on the landowners holding.

The illustrative masterplan shows links to and the policy requires links to the Ullswater development which provides onward links to the South Lowestoft Industrial Estate.

It is acknowledged that the development will result in the loss of high grade agricultural land. However, many alternative options would have the same effect. On balance the benefits of the development are considered significant enough to outweigh the loss of high grade agricultural land.

Issues raised with respect to privacy would be addresses at the time of detailed planning applications. The requirement for open space and flood mitigation to the north of the site means few existing properties will back on to new development. The Country Park has been moved on the illustrative masterplan to the west of the site which means properties along Rushmere Road will also not back on to new development.

Impact on existing property prices is not a material planning consideration and cannot be taken into account in the preparation of a Local Plan.

In terms of concerns raised by members of public with respect to flooding, the requirement in the policy for flood mitigation should improve the existing situation and remove the risk from some existing properties along The Street.

The provision of a country park, subject to design considerations could provide new bridleways. New development will have to provide solutions to improve the capacity of the sewerage network to the satisfaction of Anglian Water.
In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

Loss of private views over the countryside is not a material planning consideration and cannot be taken into account in preparing the Local Plan.

The proposed new primary school will be in a more central location which better serves the large populations on the Bloodmoor estate and the housing estates to the north of Castleton Avenue. This should help encourage travel to school by walking. Therefore, the traffic impacts associated with school travel should be reduced, as acknowledged by Suffolk County Council as the Highway Authority.

The Suffolk Design Guide is now out of date. Suffolk County Council as the Highway Authority are happy with the access arrangements.

Policy WLP2.16 – Land at South Lowestoft Industrial Estate

Statutory Consultees

The Environment Agency stated that this area potentially drains into the Kirkley Stream catchment. They stated it would be beneficial to ensure that surface water management measures reduce surface run off from future development. They added that Suffolk County Council have identified a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues.

New Anglia Local Enterprise Partnership welcomed the identification of employment land designation in the Enterprise Zone. They noted that Suffolk County Council is in the process of developing industrial units at this location.

Suffolk County Council stated that Main vehicular access from should be from Hadenham Road. They stated that opportunities for a public right of way to WLP2.15 should be sought.
Suffolk County Council stated this site is adjacent to Lowestoft Household Waste Recycling Centre and within 250m of Lowestoft Vehicle Car Breakers. They noted that proposals at these allocations need to be able to coexist with these facilities.

Suffolk County Council stated that discharge via ordinary watercourses will have to confirm where these drain to, if eventually to the Kirkley Stream they would expect betterment, as there is significant flood risk downstream which may affect WLP2.15.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

Suffolk Wildlife Trust stated that the site has not been subject to wildlife audit and therefore its current ecological value has not been established. They stated that although the policy requested an ecological assessment and the retention of natural features, with a baseline ecological assessment it cannot be confirmed that the site is appropriate for allocation for development. They recommended that further ecological assessment was undertaken. They stated that 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.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

It was suggested that there is provision of a road between WLP2.15 and WLP2.16 for local traffic moving between the residential area and the employment area. It was suggested this would reduce the congestion experienced where the A12 meets the A1145.

It was stated that the cycle link to Church Road was important as was a link to WLP2.15.

Concern was raised about the loss of agricultural land for food production. It was stated that industrial development should be concentrated on South Quay.

How these comments have been taken into account in the Final Draft Local Plan

All development will require sustainable drainage measures in line with Policy WLP8.24.
A requirement for an ecological assessment has been added to the policy.

It is not possible to secure a road link between WLP2.15 and WLP2.16 as the road travels through land which is not available for development. A cycle link can be achieved through the Bloodmoor/Ullswater housing estates.

There is insufficient land available to accommodate development needs on brownfield/previous developed land. Therefore it is necessary to allocate agricultural land for housing and employment development.

Policy WLP2.17 Land at Mobbs Way, Oulton

Statutory Consultees

New Anglia Local Enterprise Partnership welcomed the identification of employment land designation in the Enterprise Zone.

Parish and Town Councils

Oulton Parish Council stated that screening between the site and the Woods Meadow development should have already been started or marked out.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

Concern was raised about the impact on infrastructure. Concern was raised about the impact of the Local Plan on the Neighbourhood Plan. It was suggested that the Neighbourhood Plan should be completed and use that to highlight the areas which should be developed.

It was noted that the area appears to be working well as an industrial site. It was suggested that consideration needs to be given for parking of heavy lorries. It was suggested that a roundabout on to Gorleston Road was required to support the expansion.
How these comments have been taken into account in the Final Draft Local Plan

The Council’s Local Plan needs to set out the strategic matters concerning growth and development for the Waveney District. Importantly, it must set out a plan for meeting objectively assessed needs for housing employment development. This means there is a necessity to identify sites for development within the plan in all parts of the District, irrespective of whether a Neighbourhood Plan is under preparation or not. If the Local Plan does not identify sufficient land there is a significant risk that speculative development could occur in advance of Neighbourhood Plans coming forward.

There is no evidence to suggest a roundabout is needed and the Highway Authority have not identified a need for a new roundabout at the access on to Gorleston Road.

Policy WLP2.18 Oakes Farm, Beccles Road, Carlton Colville

Statutory Consultees

The Broads Authority noted that the allocation is close to the Broads and would extend the built form of Lowestoft towards the Broads.

The Environment Agency stated that the area potentially drains into the Kirkley Stream catchment. They stated it would be beneficial to ensure that surface water management measures reduce surface run off from future development. They added that Suffolk County Council have identified a need for strict requirements on surface water discharge to the Kirkley Stream due to known flood risk issues. They welcomed the conservation of hedgerows and trees within the development.

Historic England noted that the Grade II listed house, the Rookery, is opposite the proposed allocation. They added that the asset is not identified in the policy or supporting text and there is no apparent assessment of impact on the setting and the significance of The Rookery, particularly of the proposed floodlit sporting facilities.

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). They noted an established need for additional 3G football provision in the district, and stated the proposed population growth in the Lowestoft area will generate additional demand for sports pitches and other recreational facilities. They suggested the policy requirement, ‘Any floodlighting should be low impact’, was vague and misleading. They stated that the proposed 3G pitch will need to meet Sport England minimum standards and that the hours of floodlighting should be controlled to protect residential amenity. They added that the site specific criteria should state that changing facilities should be provided to meet Sport England/FA requirements, and car parking will be provided to meet WDC policy requirements. They also recommended 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.

Suffolk County Council stated that sustainable links were required including a new footway along the A146 frontage.

Suffolk County Council noted there is no discharge strategy is evident and soil conditions look sporadic for infiltration. They noted there is no watercourse and no Anglian Water surface water system.

Parish and Town Councils

Gisleham Parish Council stated that rather than developing this area for sport, consideration should be given to improving existing facilities in Lowestoft such as the Denes Oval. They added that this would tie in with the Ness Point proposal. They stated that they felt this site, together with site 179 would be 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.

Other Organisations

Lowestoft Railway Hockey Club stated that they were disappointed to see provision of a 3G football pitch. They noted there was already sufficient provision in the area. They stated that the area has insufficient provision of hockey facilities. They noted the only provision is that on East Point Academy which they suggested the future of was uncertain. They therefore suggested that the 3G pitch should be replaced with an astro type suitable for Hockey.

Suffolk Wildlife Trust stated that the site has not been subject to wildlife audit and therefore its current ecological value has not been established. They stated that although the policy requested an ecological assessment and the retention of natural features, with a baseline ecological assessment it cannot be confirmed that the site is appropriate for allocation for development. They recommended that further ecological assessment was undertaken. They stated that 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.

Developers/Landowners

No comments were made in response to this section/policy.
Members of the Public

It was suggested that development for sports and leisure would urbanise rural land with good ecological value and contribute to the sprawl of Carlton Colville.

Concern was raised about the impact of traffic and lighting on wildlife and people. It was added that development would have a major detrimental impact on the fringe of the Broads National Park.

It was suggested that the area would be more suitable for housing as it is close to the main road network. It was suggested that sports facilities would be better located in the central part of the town such as on the Jeld Wen site which will be near the third crossing.

It was suggested that most of the land is not level and the soil type is very heavy and doesn’t drain very well and gets water logged, which is not ideal for sporting activities. It was suggested it would be better to put the sports facilities on the land along Beccles Road and Burnt Hill Lane.

It was noted there was a lack of provision for equestrian activities.

Concern was raised about the impact on infrastructure. It was suggested that development could impact upon broadband speeds.

Concern was raised about the los of fields and countryside for people to enjoy walking.

It was suggested that this was a poor location for sports facilities from a traffic management perspective. It was suggested that development would add to existing congestion along the A146 and A1145. It was added that the Council should not consider putting traffic lights on the roundabout.

Concern was raised about the impact on existing residential properties from noise.

Concern was raised about the potential for residential development to enable the sports facilities. Concerns were raised about the impact of this on infrastructure. It was suggested that the Blundeston Prison site would be better for sports facilities.

It was questioned whether Lowestoft and Gt Yarmouth Rugby Club was being considered for residential development. It was suggested this would be a natural extension to the built up area. Alternatively, it was suggested that 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. It was suggested that the Water Lane leisure centre was not suitable to meet the sporting needs of north Lowestoft and it was questioned whether it was expected people to commute to WLP2.18.
How these comments have been taken into account in the Final Draft Local Plan

The policy has been amended to be less specific about the types of sports facilities to be provided. This will enable flexibility to deal with changing circumstances.

A requirement for a Transport Assessment has been added to the policy to ensure any traffic impacts are mitigated.

The text around flood lighting has been clarified, although it is not considered necessary to specifically reference Sport England standards. This would result in a less concise policy as there are numerous standards which could be applied. Instead the reference to relevant standards has been added to the policy.

It is not considered that the development on this site will have any impact on the setting of the Broads.

All development will require sustainable drainage measures in line with Policy WLP8.24. The Grade II listed Rookery is separated from the site by the busy A146. There is significant vegetation screening along this road. Given the low risk of any development impacting upon the setting of the Rookery, it is not considered necessary to make reference to it in the policy or supporting text.

It is not considered necessary to add a requirement to a footway along the A146 frontage as the site may not be accessed from this road.

The site is not considered suitable for housing in its entirety. It is a significant distance from Lowestoft Town Centre and employment areas and is less favourable than other options allocated for Lowestoft. However, a limited amount of residential development on the 6 hectares at the north of the site may be suitable for residential development, only in order to enable the delivery of the sports facilities.

There is no evidence to suggest that the site contains habitats and species which would undermine the overall suitability of the site. A preliminary ecological appraisal has been undertaken which didn’t identify any significant issues which would undermine the suitability of the allocation.

Issues relating to noise will need to be addressed at the planning application stage. It is considered that there is sufficient space on the site for noise not to be an issue to residential amenity.

Gunton Park has been allocated for residential development to facilitate the relocation of the Lowestoft and Great Yarmouth Rugby Club to larger and improved facilities. These are likely to be in the north of the town.
Alternative Sites

007 Burn Hill Lane to Marsh Lane, Carlton Colville

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Gisleham Parish Council stated that the use of areas to the west of Carlton Colville would have the advantage of commencing the much needed Barnby bends bypass from the roundabout at the end of Castleton Avenue. They added that Areas 7 and 112 on the Beccles Road could be developed as preferred sites as links with the A146 would enable good transport infrastructure.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was questioned why site were begin considered on the River Waveney side of Beccles Road.

It was suggested that this site should be given further consideration in place of WLP2.12.

It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use. It was suggested the site also had a benefit over WLP2.15 as surface water could discharge directly into the Broads.

It was suggested that this site would be better suited for sports and leisure development rather than the Oakes Farm site (Policy WLP2.18)
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The sites were submitted for consideration by owners, developers and interested parties. Strategic site allocations are detailed in the Draft Local Plan and discounted sites are listed in the Appendix for public comment.

The use of the land west of the A146 either for housing or sports and leisure would extend the built up area of Lowestoft and Carlton Colville towards the Broads. The Settlement Fringe Landscape Sensitive Study identified the site as having a low capacity for development due to the rural character and visibility from the Broads. Development of the site would have a detrimental impact the setting of the Broads and the landscape.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments. The allocated sites have good access to main roads and public transport without creating unacceptable levels of traffic.

The sites west of the A146 do not offer significantly better development and traffic management opportunities such that this would outweigh the harm to the Broads and landscape.

The site is not considered suitable for development. The site has not been taken forward in the Local Plan.

021 Hall Road Carlton Colville

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.
Developers/Landowners

Warnes & Sons Ltd. stated that the Local Plan had not allocated sufficient small and medium sized sites. They stated there were sound arguments which suggest this site should be included in the new Local Plan as a residential allocation including:

- The site is well related to the urban edge and would round off the existing line of development that extends along the western boundary of the site.
- The site has 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 a reputable local builder.
- There are no constraints such as contamination, flood risk, access and no excessive costs involved in preparing land for development.
- Once planning permission is granted the site will deliver houses quickly.

They noted with respect to highway impacts that the Council has provided no evidence of these and there is no comment from Suffolk County Council as Highway Authority. They added they were to allow road widening along the full length of the land in their ownership to improve flow of traffic and incorporate a footpath along the western side of Hall Road. They stated that significantly more congestion would be caused by the preferred site WLP2.15. They added that development of the site will deliver new affordable homes and improvements to infrastructure through CIL. They stated that an archaeological desktop study and geophysical scan had been undertaken which suggests archaeological concerns could be dealt with through condition. They added that the preferred site WLP2.15 would have greater archaeological potential and could impact upon the setting of a scheduled monument.

Members of the Public

It was suggested that the smaller alternative site options around Carlton Colville would be preferable as traffic will be dispersed on to several different roads.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The Draft Local Plan has allocated housing to a range of sites of different sizes that have the capacity to be developed within the plan period.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to a few small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.
The school is a locally known point of congestion at school drop-off and pick-up times. The preference is locate development where existing issues will not be exasperated. The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

The site 21 is considered less preferable to the site allocated under Policy WLP2.15 (now WLP2.16) of the Draft Local Plan. The site 21 is not of a scale to provide on-site benefits such as a school, country park, allotments, local shops, community centre, or community parking for the school.

The site has not been taken forward in the Local Plan.

022 Hammonds Farm, London Road, Gisleham, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Wellington Construction stated that in response to the Council’s concern about the poor relationship there was already liner development along London Road, and established housing to the north-east Willow Road and Jubilee Road. They added it relates better to the built up area than the proposed garden village to the north of Lowestoft. It was suggested that the site could deliver housing more quickly than preferred sites. They added improvements to car fuel efficiency will broaden the case for sustainability considerably.
Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is detached from the limited linear residential development on London Road/A12 to the south. Access to the site is off the A12 to the west and as such does not relate well with the residential development to the north. The immediate area is dominated by out-of-centre retail and tourism uses. Proposals to address issues of school capacity by sending children from the site to the proposed new school on allocated site WLP2.15 (now Policy WLP2.16) would not support sustainable methods of transport.

The site is considered less preferable to the sites allocated in the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops.

Policies in the Draft Local Plan address the issue of providing affordable housing and self build housing.

The site has not been taken forward in the Local Plan.

023 Holly Farm, Wood Lane, Oulton, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.
Developers/Landowners

Mr and Mrs Waring requested that the site is reconsidered. They suggested that there were factually inaccurate or incomplete information and inconsistent conclusions which have led to the site being discounted. They stated the Council’s assessment 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. They added 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. They stated the following was inaccurate or incomplete information in the Council’s analysis:

- The site is not only accessed from Wood Lane, it is also accessed from the surfaced and adopted Holly Hill, Camps Heath.
- The site has safe pedestrian access as it is traversed by a Public Footpath connecting to existing Camps Heath village facilities.
- The site is adjacent and contiguous to the built up area of Camps Heath and not solely in open countryside.
- The site is partly brownfield
- No account of the development of the adjacent Woods Meadow Country Park with its safe pedestrian access is made.
- Bus Stop, Primary School, Playground, Country Park, Shops, Sports Facilities are all within walking distance on existing or proposed pedestrian paths.

They stated the following were 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

They added that the site currently 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. They added the proposal would seek to remove a number of these and therefore improve the impact on the landscape. They added the site is mainly redundant and needs a economically viable future during the Local Plan period. They noted a small scale development would be anticipated to have lesser impact upon highway and pedestrian infrastructure than other alternatives.

Members of the Public

No comments were made in response to this site.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The site is located in the countryside with the countryside defined as land outside any settlement boundaries of towns or villages. The site is near to the built up area of Lowestoft and the new development at Woods Meadow.

The strategy for rural areas, as detailed in Section 7 of the Draft Local Plan, supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. The site does not have a close relationship with a “larger village” or “smaller village”. The site is on the periphery of Camps Heath a scattered settlement with no shop, school, GP surgery or any other significant services or facilities. The site is therefore not comparable with those rural sites allocated in Section 7 of the Draft Local Plan which support existing rural services, facilities and communities.

Due to the proximity to Lowestoft the site had the potential to contribute towards the Lowestoft area’s housing provision and tourism. However, the relatively minor benefits of the site are outweighed by the adverse impact on the landscape and Broads, and the site is considered less preferable to the other sites in and around the Lowestoft area. The site has not been taken forward in the Local Plan.

040 Land at Laurel Farm, Hall Lane, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Badger Building stated that the land to the east of the site remains undeveloped notwithstanding the allocation, at the whim of the land owner and that land to the south will be developed by Persimmon before the end of the plan period, They added that this site has the potential of providing the necessary junction improvement between Hall Lane and Flixton Road. They added that development of the site could also provide financial assistance with the provision of a necessary foul
sewer on Hall Lane. They stated could be linked by phasing to the Hall Lane site so that its
development did not take place before 2023. They added it 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.

Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney
Local Plan’ published July 2017 remain valid.

The site has a poor relationship with the existing built-up area of Lowestoft that is not expected to
change until 2028. The site is less preferable than other sites in the area. The site has not been taken
forward in the Local Plan.

051 Land at The Old Rectory, Church Lane, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Christopher Stannard stated that with the development of Woods Meadow, 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. Therefore
they suggested 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 view point. They
added that development would not impact on the setting of the Church or the landscape as it is well
screened by mature trees. They added there was nothing of historical value on the site. They added
the site is available immediately, deliverable and would lend itself very favourably to a low density self build or custom housing project. They stated it has 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”.

**Members of the Public**

No comments were made in response to this site.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is a field with areas of woodland that is considered to have a poor relationship with the built up area as it is largely surrounded by other fields, with the exception of the Old Rectory to the north and a few residential properties that abut the southwest corner. Land to the north/west of Church Lane and west of Wood Lane retain a semi rural character. The Old Rectory is a non-designated heritage asset and limited weight can be attributed to soft landscaping which screens the property.

The site is less preferable than other sites in the area. The site has not been taken forward in the Local Plan.

**053 Land between Church Lane and Church Avenue, Oulton**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.
Developers/Landowners

Messrs Munnings and Jermy stated the site has a good relationship to the existing built up area as the site is adjacent to housing to the north and east (including the Woods Meadow development) and a school to the south. They added there will no material impact on the listed church as the site is approximately 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. They added the site is in a more sustainable location that site WLP2.12 which they stated was in the strategic gap. They added the site is less than 3 miles from Lowestoft Town Centre and close to proposed services and facilities on the Woods Meadow site. They stated there was potential to provide 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. They added they would not object to undertaking archaeological work.

Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is a field that is considered to have a poor relationship with the built up area. The land to the north/west of Church Lane and west of Wood Lane is outside the settlement boundary and new development at Wood Meadows. The area retains a semi rural character that is separate from the urban character of the Lowestoft area.

Additional housing to the west of Church Lane would extend the built up area towards the Grade I listed Church of St Michael and into the countryside having a detrimental impact on the setting of the church, the landscape and the Broads.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now Policy WLP2.13) of the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops.

The site has not been taken forward in the Local Plan.
056 Land between Rushmere Road and Fairhead Loke, Carlton Colville

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Keith Winter stated the site has the potential to deliver land for the expansion of the primary school and car parking on the same side of the road if the site developed for housing.

Members of the Public

It was suggested that the smaller alternative site options around Carlton Colville would be preferable as traffic will be dispersed on to several different roads.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The Draft Local Plan has allocated housing to a range of sites of different sizes that have the capacity to be developed within the plan period.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments
The site is considered less preferable to the site allocated under Policy WLP2.15 (now Policy WP2.16) of the Draft Local Plan. Rushmere Road is a country road and there is no evidence it is dangerous. The option of parking in a car park on the same side of the road as Carlton Colville Primary School does not outweigh the other on-site benefits of site WLP2.15.

The site has not been taken forward in the Local Plan.

080 Land off Church Lane, Carlton Colville

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Badger Building noted that the site is the subject of a current application by ourselves and for the reasons set out in that application and taking in to account the comments made in the site analysis, they 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. They added 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.

Members of the Public

It was suggested that the smaller alternative site options around Carlton Colville would be preferable as traffic will be dispersed on to several different roads.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The Draft Local Plan has allocated housing to a range of sites of different sizes that have the capacity to be developed within the plan period.
The strategy in the Draft Local Plan allocates a significant percentage of the district's growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

The site is considered less preferable to the site allocated under Policy WLP2.15 of the Draft Local Plan. The site has not been taken forward in the Local Plan.

111 Land to the north of the A146, Beccles Road, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Durrants (on behalf of the landowner) noted that Carlton Colville Town Council had previously stated the town must retain its semi-rural nature. They note that the development of this site 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. They added the site is boarded to the East, South and West by roads which would define a clear boundary of where development stops. They added potential impacts on the landscape could be minimised by devising a low level lousing scheme; bungalows and planting around the site close to already established hedges. They argued that Site 11 is not visible from the land to the north on the other side of the railway (photos added to...
illustrate point). They stated that if the sites were to have bungalows there would be fewer units on the sites which would in theory minimise the extra recreational impact on Carlton Marshes. They added there would be a distinct separation between Carlton Marshes and the proposed sites by the railway and grassland to the north. They stated that the site is outside of the flood zone and easily accessible from Burnt Hill Lane, Ivy Lane and A146.

Members of the Public

It was questioned why site were begin considered on the River Waveney side of Beccles Road.

It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The sites were submitted for consideration by owners, developers and interested parties.

The use of the land would extend the built up area of Lowestoft and Carlton Colville towards the Broads. The Settlement Fringe Landscape Sensitively Study identified the site as having a major contribution to the setting of the Broads and therefore a low capacity for development. Whilst the impact of development may be mitigated the railway line, through planting and through the design of the housing, the site remains less preferable than other sites in the area.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments

The site has not been taken forward in the Local Plan.
112 Land to the north of the A146, Beccles Road, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Gisleham Parish Council stated that the use of areas to the west of Carlton Colville would have the advantage of commencing the much needed Barnby bends bypass from the roundabout at the end of Castleton Avenue. They added that Areas 7 and 112 on the Beccles Road could be developed as preferred sites as links with the A146 would enable good transport infrastructure.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Durrants (on behalf of the landowner) noted that Carlton Colville Town Council had previously stated the town must retain its semi-rural nature. They note that the development of this site 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. They added the site is boarded to the East, South and West by roads which would define a clear boundary of where development stops. They added potential impacts on the landscape could be minimised by devising a low level lousing scheme; bungalows and planting around the site close to already established hedges. They argued that Site 112 is not visible from Carlton Marshes (photos submitted to illustrate point). They stated that if the sites were to have bungalows there would be fewer units on the sites which would in theory minimise the extra recreational impact on Carlton Marshes. They added there would be a distinct separation between Carlton Marshes and the proposed sites by the railway and grassland to the north. They stated that the site is outside of the flood zone and easily accessible from Burnt Hill Lane, Ivy Lane and A146.

Members of the Public

It was questioned why site were begin considered on the River Waveney side of Beccles Road.

It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The sites were submitted for consideration by owners, developers and interested parties.

The use of the land would extend the built up area of Lowestoft and Carlton Colville towards the Broads. The Settlement Fringe Landscape SENSITIVELY Study identified the site as having a major contribution to the setting of the Broads and therefore a low capacity for development. Whilst the impact of development may be mitigated the railway line, through planting and through the design of the housing, the site remains less preferable than other sites in the area.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

It is highly unlikely that the development of site 7, 111 and 112 would result in sufficient developer contributions to fund a bypass of the Barnby Bends.

The site has not been taken forward in the Local Plan.

137 Rear of Nos 485 & 487 London Road South, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

Waveney Removers stated there were no tree preservation orders on the site and is not within a conservation area.

Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The comments regarding the trees have been noted and assessments updated as appropriate. The site is a small site within the Settlement Boundary of Lowestoft where the principal for residential development is considered acceptable subject to details and site specific issues.

The site has not been taken forward in the Local Plan.

147 The Old Rifle Range, A12 London Road, Pakefield, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Tegerdine considered that the scale of growth in the rural areas was disproportionate and it was not a sound approach when there was land available within Lowestoft, the most sustainable location in
the District, such as this site. They referred to previous evidence submitted which demonstrated the deliverability of the site. They stated that the reasons given for discounting the site as a residential allocation are weak and unsubstantiated. They stated the site has a good relationship to the built up area as it borders a row of cottages known as Catherine Terrace, Elizabeth Terrace and Barnard’s Terrace. They added that 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. They argued that primary school capacity would be provided on the preferred site WLP2.15 and this site could financially contribute towards it and therefore improve the viability of that allocation. They stated 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. They added 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.

**Members of the Public**

It was suggested that development of this site would be preferable to WLP.15 as it would deliver housing closer to major road networks to ensure bus routes can be utilised.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The strategy of allocating development in rural areas is considered appropriate and proportionate. The strategy enables development to enhance or maintain the vitality of rural settlements.

The site abuts a row of terrace properties that front the A12 but is not well related to the residential properties in either Pakefield or Carlton Colville. Attempts to address school capacity by sending children from the site to the proposed new school on allocated site WLP2.15 would not offer or support sustainable methods of transport.

The site is considered less preferable to the sites allocated in the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.
The site is considered less preferable to the sites allocated in the Draft Local Plan. The site has not been taken forward in the Local Plan.

164 Land west of Northern Spine Road/north of Pleasurewood Farm

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was stated that the development of this site would be preferable to WLP2.12. It was stated that concerns over access could be addressed and the landscape is no more sensitive than WLP2.12. It was suggested that the adjacent sewerage treatment works to WLP2.12 was a similar constraint to the adjacent landfill site on site 164.

It was suggested that the site would be a more natural extension to Lowestoft than the proposed WLP2.12.

It was suggested that development of this site would be preferable to WLP.15 as it would deliver housing closer to major road networks to ensure bus routes can be utilised.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.
Development of the site would have an adverse impact on the landscape and there is a risk of contamination.

The strategy in the Draft Local Plan allocates a significant percentage of the district’s growth to the Lowestoft area. The level of proposed new housing to north Lowestoft area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now WLP2.13) of the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops. The site has not been taken forward in the Local Plan.

172 Land west of Parkhill, Oulton (south of Spinney Farm)

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was noted that access along Parkhill for pedestrians is very poor. Concerns around safety were noted in this respect. Concern was raised with respect to the cumulative effect on this with the Woods Meadow development. It was noted that there is not a great deal of facilities for those who cannot use a car around Oulton/Blundeston regarding shops, Doctors etc.
How these comments have been taken into account in the Final Draft Local Plan

No changes to the site allocations are considered necessary.

178 Carlton Motors, Rushmere Road, Gisleham

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was suggested that the smaller alternative site options around Carlton Colville would be preferable as traffic will be dispersed on to several different roads

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is small and narrow and would not accommodate many houses.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.
The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

The site has not been taken forward in the Local Plan.

**179 Eades Farm, Beccles Road, Carlton Colville**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

Carlton Colville Town Council requested that this site is reconsidered. They stated the site has access on to the A146 with good links to Norwich, Beccles and Lowestoft. They indicated the site could deliver a similar quantum of development as WLP2.15. They noted the site would not require a Country Park as it will be adjacent WLP2.18 which will provide walking facilities. They noted that cycle paths could provide connections back into Carlton Colville. They stated that the site would generate the same benefits as those proposed under policy WLP2.15 and would allow for the existing community of Carlton Colville to continue to benefit from a semi-rural environment.

Gisleham Parish Council stated that they felt this site and WLP2.18 are the most suitable areas for housing development to the west of the town. They added 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. They stated public transport links would be far easier to create than the proposed area WLP2.15.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

No comments were made in response to this site.
Members of the Public

It was suggested that the site was more suitable than site WLP2.12 and WLP2.15. It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site would support a range of on-site infrastructure and the strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the south Lowestoft/Carlton Colville area will necessitate the provision of new services and facilities, such as a new school. Nevertheless, the site is considered less preferable than the allocated site WLP2.15 (now WLP2.16).

The site is further from the main residential areas of Carlton Colville and offers less opportunity to integrate the site with the existing residential properties. Site is less able to provide spaces, services and facilities that would benefit both the existing and proposed housing developments.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

No changes to the site allocations are considered necessary.

182 Land south of 324 Yarmouth Road and east of Pleasurewood Hill north of Gunton Avenue, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

Forecore Ltd. stated that the Local Plan had not allocated sufficient small and medium sized sites. They stated there were sound arguments which suggest this site should be included in the new Local Plan as a residential allocation including:

- The site is well related to the urban edge and built up area of North Lowestoft begin surrounded by development to north, south and east.
- The site has 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.
- There are no constraints such as contamination, flood risk, access and no excessive costs involved in preparing land for development.
- Once planning permission is granted the site will deliver houses quickly.

They considered that impact on the townscape is not to be of sufficient reason to exclude the site from the local plan and a well designed residential development could offer an equally positive contribution to the townscape and the entrance to the town. They suggested a low-density scheme which retains as much of the existing natural landscaping features and maintains a rural character. They added that in the event of WLP2.12 being developed the entrance to the town will shift a good deal further north. They added that development of the site will deliver new affordable homes and improvements to infrastructure through CIL. They noted that larger allocations proposed in the plan have numerous constraints which might delay development or significantly reduce the number of dwellings delivered.

Members of the Public

It was suggested that this site was preferable to WLP2.12.

It was suggested by another that the site makes an attractive contribution to the townscape and the entrance to the town and creates a rural feel to locality on the edge of the town. It was considered that this statement was also applicable to potential development of the Lowestoft and Gt Yarmouth Rugby Club which is visible and adjacent to this land.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The Draft Local Plan has allocated housing to a range of sites of different sizes that have the capacity to be developed within the plan period.
The strategy in the Draft Local Plan allocates a significant percentage of the district’s growth to the Lowestoft area. The level of proposed new housing to the north Lowestoft area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now WLP2.13) of the Draft Local Plan which can accommodate on-site benefits such as a school. The site has not been taken forward in the Local Plan.

183 Land to the south of Hall Lane, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Ken Houchen objected to the fact that the Plan had discounted this site. It was suggested the site was not in open countryside and is located in close proximity to the hamlet of Camps Heath and the cluster of dwellings that extend along Fisher Row & Holly Hill. It was added that the site is also located just beyond the northern boundary of the large residential site known as Woods Meadow which is currently being developed. It was noted that no formal highway comments had raised concern about safe vehicular access. They added the site provides an opportunity for a low density well designed residential development that will relate well to its surroundings. They added the site could be developed as self build/ custom build housing to meet local need. They added the site is well contained by well established hedgerows.
Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed. The site is located in the countryside outside the settlement boundary of the Lowestoft area and is surrounded by agricultural fields. The site is close but distinct from the built up area of Lowestoft and the new development at Woods Meadow.

The pedestrian access is considered poor as there are no footpaths or street lighting that connect the site to services, facilities or public transport. The vehicle access is off a country road.

Due to the proximity to Lowestoft the site had the potential to contribute towards housing for the town. However, the relatively minor benefits of the site are outweighed by the larger benefits of the allocated site in the Draft Local Plan. The site has not been taken forward in the Local Plan.

184 Oakenshaw, Parkhill, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was suggested that this site would be preferable to WLP2.12 and WLP2.15. It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is not suitable for development due to the impact on the setting of the Parkhill Hotel Grade II listed building.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the north Lowestoft area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now WLP2.13) of the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops. The site has not been taken forward in the Local Plan.

185 Parkhill, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

It was suggested that this site would be preferable to WLP2.12 and WLP2.15. It was suggested that this site was preferable as it borders an existing main road and access and therefore better in traffic management terms. It was suggested the site is better located to fit in with bus routes and therefore discourage car use.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is not suitable for allocation in the Local Plan due to the impact on the setting of the Parkhill Hotel Grade II listed building.

The cumulative impacts on the road network of the new development within Lowestoft has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction. Mitigation measures for this have been identified. Other improvements necessary to mitigate development will be identified through Transport Assessments.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the north Lowestoft area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now WLP2.13) of the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops. The site has not been taken forward in the Local Plan.

187 Plot ‘H’, Blundeston Road, Oulton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

It was suggested that this site would be preferable to WLP2.12.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is isolated in the open countryside with poor access.

The strategy in the Draft Local Plan allocates a significant percentage of the districts growth to the Lowestoft area. The level of proposed new housing to the north Lowestoft area will necessitate the provision of new services and facilities, such as a new school. Distributing housing growth to 2/3 small/medium sites will not provide the number of houses required by the overall strategy of the Local Plan or the opportunity to provide on-site services, facilities and benefits to the local community.

The site is considered less preferable to the site allocated under Policy WLP2.12 (now WLP2.13) of the Draft Local Plan. The site is not of a scale to provide on-site benefits such as a school, employment, and local shops. The site has not been taken forward in the Local Plan.

204 Harbour Road, Lowestoft

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

G Hayward stated the site should be reconsidered. He questioned differences in the assessment between site 204 and site 54. They acknowledge the site had potential contamination. They concluded that the site is available, suitable and achievable.

Members of the Public

It was suggested that the site appears to be ideally suitable to mixed use housing and marina. It was noted there was likely to be less contamination on this site than on the Badger Building site at Caldecott Road. It was noted that once the Brooke Peninsula site is developed this will be an attractive site for development with close links to the railway station and local amenities.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site has not been taken forward in the Local Plan.
Beccles and Worthingham

Strategy for Beccles and Worthingham

Statutory Consultees

The Broads Authority commented that the proposed growth in Beccles and Worthingham would create recreational pressure on the Broads and mitigation would be required.

South Norfolk District Council (draft) was supportive of the strategy for Beccles and Worthingham and made comment on allocated sites, housing, employment and infrastructure.

Parish and Town Councils

Beccles Town Council queried whether the district-wide 35% Affordable Housing requirement applies the same to Beccles. They consider the proposed number of homes to be too high. The Town Council would like to see Planning policies allocate affordable housing to local residents and consider that there is a greater need for 1 and 2 bedroom homes. They would like to see more than 15% leisure growth in Beccles as it is currently poorly served in this regard. The Town Council would also like to see provision for a large supermarket to serve the south of the town.

Beccles Town Council believed that the preferred option For Beccles and Worthingham comprising the Garden Neighbourhood Is the best strategy. The Town Council agreed with concerns over the health service, traffic issues and homes being occupied by people from outside of the area. They wished to see a new health centre as part of any large scale development in Beccles and for health care provision to be reviewed prior to any planning permission for the allocated sites being granted. The Town Council would like to see a new traffic survey carried out after a reasonable length of time following the completion of the Southern Relief Road.

Worlingham Parish Council queried the level of housing and contended that Worlingham has a maximum housing need of 301 dwellings (minus windfall development) over the plan period. They queried how the 1250 homes can be retained as a maximum figure.
Other Organisations

The Beccles Society raised concerns regarding the number of housed allocated to Beccles; the lack of doctors and capacity to expand at Beccles Medical Centre; the lack of local police resources; and future water resources.

Developers/Landowners

No comments were made in response to this section.

Members of the Public

There were objections from members of the public who raised concerns in relation to a number of issues. There was some general opposition to large scale development and some felt that the proposed housing numbers are too high. Some felt that a new town should be considered instead of an extension to Beccles and Worlingham. There were also fears that the strategy could lead to an influx of people from outside of Beccles and Worlingham.

Traffic issues were cited including congestion, town centre parking problems, and roads in the town centre are not adequate to cope with the extra traffic. Reduction in air quality from increased traffic was also raised. Some people felt that public transport provision was not adequate to cope with the proposed allocations.

Many people raised concerns over the pressure on Medical Centre and the lack of doctors, along with the lack of space to expand on the site. The loss of the minor injuries clinic was also raised. The Lack of Fire Station, police presence and dental surgery capacity was also raised.

Pressure on local schools and the lack of capacity in the primary schools and high schools in Beccles was raised. There were also fears about pressure on the sewerage system. Some felt that there is a lack of jobs in the Beccles area.

There was also support for the strategy and the new homes and facilities it would bring to the area. There was support for small scale homes which would be more affordable for people. A number of respondents supported the extension of the medical centre.

Some members of the public wished to see the police station and recycling centre re-opened. One member of the public commented that Beccles and Worlingham are well placed to provide sports and outdoor leisure facilities and existing facilities should be upgraded or replaced. Some members of the public stated they would like to see car-free areas of Beccles town centre and improved public
transport. One person wished to see low level street lighting and another requested a cycle link in to the cycle route from Cedar Drive. A member of the public commented that infrastructure constraints should be fully resolved before development of the residential allocations begins.

How these comments have been taken into account in the Final Draft Local Plan

The Whole Plan Viability Study has confirmed that the district wide policy WLP8.2 requiring sites with 11 or more houses in Beccles to provide 30% affordable house is viable. The Housing Mix Policy WLP8.1 in the Draft Local Plan supports 1 and 2 bedroom houses.

Individual qualification for affordable houses is not planning consideration.

The site allocation WLP3.1 includes the provision of play areas, sports fields and cycle routes. David Lock Associates have developed the master plan for site WLP3.1 in further detail.

Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018), shows that traffic congestion through Beccles will not be increased to unacceptable levels. Due to the comprehensive Transport modelling carried out further surveys are not considered necessary once the Southern Relief Road has been completed to support the Local Plan, but a Transport Assessment and Travel Plan should be submitted with any planning application.

Support for car free areas in Beccles are noted but are not necessary as part of the allocation of land for development in the Local Plan. Development in Beccles should support public transport provision.

The housing need for the district was identified in the Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Area published May 2017. The options for distributing housing throughout the district were addressed in the Help Plan our Future report published April 2016. Beccles and Worlingham are considered suitable to take 16% of the district’s growth until 2036 which equates to 1,473 houses.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.
Policy WLP3.1 – Beccles and Worlingham Garden Neighbourhood

Statutory Consultees

The Environment Agency supported the policy in respect of preservation of field boundaries, hedgerows and woodlands. They wish to see further detail in regard to sustainable drainage.

Historic England commented that the setting of the grade II listed Worlingham Manor does not appear to have been considered, although they note the positioning of the country park bordering Ellough Road.

Suffolk County Council commented that access on to the Southern Relief Road could be incorporated, subject to design. They would require pedestrian and cycle links to Beccles, but not vehicular links. The County Council would require a full transport assessment and travel plan. Comments on surface water drainage were provided.

Suffolk Wildlife Trust recommended that ecological assessment of the sites takes place before determining whether it is appropriate for allocation.

Parish and Town Councils

Beccles Town Council supported WLP3.1 as it will deliver infrastructure and have least impact on the road network. The Town Council supported car access only on to the southern relief road and would like to see bus gates allowing bus routes between the allocation and the existing town. They stated that infrastructure should be tied to milestones in development, preventing further development until the infrastructure is provided. The Town Council added that the policy should limit the maximum number of homes and specify the amount of space for parks, open space, landscaping etc. They requested a strategic gap on the Beccles and Worlingham parish boundary. Beccles Town Council would like to see phased development. Beccles Town Council wished to see a new primary school provided to support growth, rather than the expansion of Worlingham Primary School. Greenways in to the existing residential roads should be provided to encourage sustainable transport. They would like to see reference to electricity supply upgrades in the policy.

Worlingham Parish Council claimed that the masterplan will result in the southeast part of Beccles coalescing with the southwest part of Worlingham and stated that the land should be left undeveloped to protect the separate identities. The Parish Council raised concerns over development of greenfield sites and countryside. Worlingham Parish Council commented that the layout of the masterplan does not protect the character of Worlingham. They also raised concerns over loss of wildlife habitats; surface water drainage; traffic impacts; and lack of a new medical facility. The Parish Council queried the demand for employment use as part of the allocation. Worlingham Parish Council contended that policy 3.1 does not achieve economic, social and environmental objectives of the NPPF and request that alternative options are considered.
Other Organisations

The Beccles Society supported the garden village development principle. They took the view that policy WLP3.1 should included phasing for infrastructure in detail of funding. They suggested the use of bus gates to allow buses to travel between the new and existing development, but no access for cars. The Beccles Society recommended a landscaped strip is planted along the Beccles/Worlingham parish boundary. They accept the access points on to the southern relief road for cars. The Society added that the London Rd/Peddars Lane/St Marys Rd junction will need improving. What provision will be made for more town centre car parking? They recommend a mid-sized supermarket is provided on WLP3.1.

Worlingham Neighbourhood Plan Team supported the retention of the individual identities of Worlingham and Beccles and using open space to define boundaries. They requested that the total number of homes for both preferred sites in Beccles is included in the ‘Frequently Asked Questions’. The Team requested that policy WLP3.1 specifies that up to 1100 dwellings are to be delivered during the plan period.

Using the results of the Worlingham Household Questionnaire, Worlingham Neighbourhood Plan team suggested that there would be high levels of concern over 400 homes in Worlingham. Windfall development is likely to add an additional 23 homes in Worlingham over the plan period. There is broad local acceptance of the need for significant levels of housing development, but an increase above 400 dwellings would risk resentment from the community and harm to the parish’s character and identity. The Neighbourhood Plan Team suggested alterations to the layout of the masterplan including moving some of the housing eastward and an access on to Ellough Road. They also suggested landscaping in between existing and proposed homes to provide privacy and security and highlight they are keen to be involved and make recommendations regarding the local plan. The Neighbourhood Plan Team had concerns over smells blowing over the site from nearby industrial sites. They supported consideration of accommodation for sheltered or retired communities, along with market housing for older people. The Team would like to see the character of Worlingham and Beccles reflected in new housing. The Neighbourhood Plan Team would like to see phasing of development in Worlingham throughout the plan period. The team highlighted concerns in relation to the capacity of the medical centre and traffic volumes.

Beccles and Bungay Cycle Strategy supported the masterplan. They also supported the provision of the cycle link to Ellough Industrial estates as part of the Garden Neighbourhood and would like to see it extended along Benacre Road to Anson Way. The group supported the creation of greenways linking in to the existing built-up area and access for cars being on to the relief road only.
Developers/Landowners

DLP Planning Ltd (on behalf of Larkfleet Homes) supported the allocation of the sites under policy WLP3.1 which they highlight are not subject to constraints which would inhibit development. They commented that the scale of development allows for a mixed use development with a variety of facilities and services that would complement Beccles and Worlingham. DLP Planning stated that the sites are well situated for employment opportunities at the nearby Ellough industrial estate and enterprise zone. The forthcoming relief road would create a hard physical edge that would enclose the site and create a logical edge to the settlement. DLP Planning commented that Larkfleet’s research and consultation events have confirmed the suitability of their site (82). They supported the principle of creating a masterplan and raise the following issues for consideration in relation to this:

- Location of employment land
- A water main traversing the site from east to west and the need for an easement
- Location of the primary school
- Indoor and outdoor facilities needs
- Location of care retirement community and co-location with community uses and local centre
- Maximising opportunities for sustainable transport
- Rights of way on and adjacent the site
- Ecological opportunities and mitigation from recreational pressures
- Impact of noise from Southern Relief Road and neighbouring employment sites
- Impact on neighbouring houses
- Retail units should be highly visible and easily accessible from outside the site
- The adjacent triangle of land to the southeast of the Garden Neighbourhood should be included in the plan
- Inclusion of sustainable drainage and green infrastructure

DLP Planning recommended that the proposed country park is located further to the southwest of their site. They stated that an access to the site from Ellough Road would serve early phases of development and their highway modelling found there is sufficient capacity in the network to accommodate this. DLP Planning stated that Larkfleet’s site could support sustainable drainage systems, green infrastructure, sustainable transport means, and high quality open space. They stated they have concerns over the technical robustness of the masterplan and its deliverability and viability.

The Owners of Chenery’s Land (sites 8 and 9) supported the allocation and masterplan in policy WLP3.1 and are prepared to assist in the delivery of services, facilities, roads, cycle paths and landscaping. They are prepared to work with other parties in order to facilitate the delivery of the master plan.
Beccles Townlands Trust supported the allocation and masterplan in policy WLP3.1 and is prepared to assist in the delivery of services, facilities, roads, cycle paths and landscaping. They are prepared to work with other parties in order to facilitate the delivery of the master plan.

Badger Building Ltd commented that the allocation should be broken up in to smaller elements to assist with delivery and provide choice in the town.

Gladman Homes Ltd commented that the Council will need to demonstrate deliverability of large strategic allocations and also test their viability.

River Waveney Trust commented that the policy should include reference to sustainable drainage schemes and green infrastructure. Development should be phased to allow for improvements at the Beccles/Marsh Lane water recycling centre.

Waveney and Yare Housing Association commented that the masterplan lacks social/leisure provision and a pub/restaurant is crucial. They commented that the employment area could be extended to incorporate larger retail outlets and parking. There is greatest need in the locality for smaller residential units.

**Members of the Public**

Members of the public objected to this allocation on a number of grounds. Some neighbouring residents were concerned about overlooking/loss of privacy and light pollution. There were concerns about the amount of traffic that the development would generate and the impact on parking in the town centre. Others were concerned about access on to the southern relief road lowering the speed limit on the relief road. Some members of the public queried how construction traffic would access the site. Electricity supply issues in Ellough were also cited as a reason for objection.

Some members of the public objected due to the increase in surface water flooding and development of greenfield sites. There were concerns about the appearance of housing in the countryside and how the development would harm the character and identity of Worlingham. Other members of the public raised the issue of noise and smells from nearby industrial sites affecting new residents. Some members of the public stated that the sewerage system would not cope with the development.

Concerns were raised about the risk of the proposed infrastructure not being provided by developers. There were many objections due to the existing strain on the medical facilities in Beccles and the lack of proposed new medical facility. There were also questions about how the infrastructure will be funded and who will manage and maintain open spaces and play areas. Some residents objected due to the lack of pharmacy or post office.
There were also many members of the public in favour of the Garden Neighbourhood. Members of the public stated that the land beside the southern relief road is a suitable location for development and the preferred option takes advantage of opportunities created by the new road. There was support for the layout of the masterplan - provision of open space and pedestrian and cycle access were cited as strengths. Some respondents were supportive provided that roads, schools, doctors, shops and sewers were adequate. Some members of the public suggested that routes for buses could be opened up between the Garden Neighbourhood and the built up areas to the north. It was also suggested that one way vehicular access from the south of Beccles and Worlingham on to the southern relief road could be opened up.

A number of people were keen to see landscaped buffers between the existing houses next to the site and the new homes. Many people were supportive of retaining the separate identities of Beccles and Worlingham.

A number of respondents were supportive of the principle of masterplanning the area as it provided a joined-up approach and control over the area. Some members of the public commented that the masterplan approach would deliver greater infrastructure than a patchwork development. It was highlighted that infrastructure must be provided at specific trigger points during development. One person wished to see a pub on the development and there was support for a medium or large supermarket to be provided. The retirement community was also supported. Respondents highlighted that new homes were needed in Beccles and Worlingham and that these would support local shops and schools which may be lost without new growth.

Some respondents had questions about the preferred option or had comments or suggestions to make. One person questioned whether there was a need for a retirement community in this location. Others queried what would be done to improve car parking in the town centre. One respondent questioned if there would be a focus for young people in the Garden Neighbourhood.

It was suggested that the policy criteria should include sustainable drainage and that development is phased to allow for the water recycling centre to be upgraded. Some respondents wished to see a mix of architectural styles used including reference to older styles and examples of high quality modern design. Another person stated that sufficient car parking should be provided. It was suggested that the development should be designed to take in to account people with disabilities.

One respondent suggested that the country park should be made a destination and include a café and a car park. Another respondent suggested that the country park is broken up and distributed across the site to provide a green axis and break up areas of housing.
How these comments have been taken into account in the Final Draft Local Plan

David Lock Associates have developed the master plan for site WLP3.1 in further detail following consultation with interested parties. The master plan has taken into consideration the character and identity of Beccles and Worlingham, issues of coalescence, landscape buffers, the impact on Worlingham Manor, access onto the Southern Relief Road, pedestrian and cycle links/routes, and bus routes.

The master plan includes a Community Hub that allows flexibility for shops, pubs, café or other facilities to brought forward as required.

Additional policy wording has been added stating “on-site infrastructure, including the primary school, community centre, sports fields and open spaces will be secured and funded through Section 106 planning obligations.”

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

For Waveney to accommodate the projected growth, it is inevitable that development will have to occur on greenfield land. In terms of greenfield allocations, the strategy has sought to direct these to the least environmentally sensitive land where there is greatest potential for social and economic gains. This is evidenced in the Sustainability Appraisal Report.

Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018), shows that traffic congestion through Beccles will not be increased to unacceptable levels. Due to the comprehensive Transport modelling carried out further surveys are not considered necessary once the Southern Relief Road has been completed, but a Transport Assessment and Travel Plan should be submitted with any planning application.

The Whole Plan Viability Study (2018) has confirmed the viability and deliverability of the site.

Reference to surface water drainage, sustainable drainage and green infrastructure in Policy WLP3.1 are not considered necessary as this is addressed through the Flood Risk policy WLP8.24.

Issues relating to private views and value of property are not material planning considerations which can be taken into account in the preparation of the Local Plan.

Waveney has an aging population and there will be an increased need for facilities and services for older people.
Policy WLP 3.2 – Land West of London Rd, Beccles

Statutory Consultees

The Environment Agency supported the requirement for contamination assessment of the petrol station. Any extension to the cemetery will require a groundwater assessment.

Historic England commented that this site is adjacent to the conservation area boundary and is an opportunity to enhance the conservation area.

Suffolk County Council (draft) commented that a new footway should be provided along the site frontage plus sustainable links such as off-site rights of way into the countryside. The County Council would require a transport assessment for this development. They added that there is some risk or surface water flooding on the site.

Parish and Town Councils

Beccles Town Council supported allocation WLP3.2.

Other Organisations

Beccles and Bungay Cycle Strategy supported cycle links to Meadow Gardens and Kemps Lane. There should be no vehicular access to the north. A central refuge should be provided to help safe crossing of London Road.

Developers/Landowners

No comments received.

Members of the Public

Two members of the public commented that Development of this site will create traffic issues on London Road. One person objected due to loss of view and impact on their property value.

Some respondents registered their support for this allocation. One member of the public stated that access should be on to London Rd only. Another member of the public wished to see cycle links to the Kemps Lane cycle route on the eastern side of London Road. There was support for landscaping between the existing neighbouring homes to the north and east of the site and any new dwellings.
There was also support for protecting existing trees on the site. One person noted that there were three major trunk pipes running through the site.

**How these comments have been taken into account in the Final Draft Local Plan**

Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018), shows that traffic congestion through Beccles will not be increased to unacceptable levels. A Transport Assessment and Travel Plan should be submitted with any planning application.

The policy wording includes support for pedestrian and cycle links and retention of natural landscape features.

Issues relating to private views and value of property are not material planning considerations which can be taken into account in the preparation of the Local Plan.

**Policy WLP3.3 – Land South of Benacre Road at Ellough Airfield, Ellough**

**Statutory Consultees**

New Anglia Local Enterprise Partnership supported this allocation.

Suffolk County Council commented that a transport assessment would be required for this development. There is some surface water flood risk on the site.

**Parish and Town Councils**

Beccles Town Council was supportive of this allocation and would like to see the retention of the Enterprise zone and an upgrade to the electricity supply. They also would like to see a cycle link from the southern relief road, along Benacre Road to the roundabout at Copland Way, and as far as Beccles Business Centre.

**Other Organisations**

No comments received.

**Developers/Landowners**

No comments received.
Members of the Public

One member of the public objected due to the development of greenfield sites. Others registered their support for the allocation. It was suggested that policy WLP3.3 should include provision for a cycle link between the southern relief road, the roundabout at Copland Way, and Beccles Business Park. There was also support for upgrade to the electricity supply.

How these comments have been taken into account in the Final Draft Local Plan

Transport modelling undertaken has identified the impacts of development at the allocated sites and the mitigation works required. The Transport modelling, reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018), shows that traffic congestion through Beccles will not be increased to unacceptable levels. A Transport Assessment and Travel Plan should be submitted with any planning application.

In terms of concerns relating to infrastructure provision, such as electricity, through liaison with key infrastructure providers, the plan has identified where there are issues with the provision of infrastructure and has identified the necessary improvements required. There are sufficient mechanisms in place to ensure the delivery of infrastructure including developer contributions.

For Waveney to accommodate the projected growth, it is inevitable that development will have to occur on greenfield land. In terms of greenfield allocations, the strategy has sought to direct these to the least environmentally sensitive land where there is greatest potential for social and economic gains. This is evidenced in the Sustainability Appraisal Report.

Pedestrian and cycle routes though allocated site WLP3.1 will improve access to the site WLP3.3.
Beccles and Worlingham - Alternative Sites

016 Former Beccles Heat Treatment, Gosford Road, Beccles ................................................................. 951
024 Homestead Farm, Ringsfield Road, Beccles ...................................................................................... 952
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016 Former Beccles Heat Treatment, Gosford Road, Beccles

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

One member of the public commented that this site and the adjoining site are derelict and should be prioritised for re-development for a mixed use scheme including housing and retail.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site on its own is less preferable than other sites due to the close proximity of the commercial garage. Should the land to the west of the site come forward then the two plots together would be suitable for a mixed use redevelopment. The site is located within the settlement boundary of Beccles where there is presumption is favour of development and may come forward for consideration as windfall development.

The site has not been taken forward in the Local Plan.

024 Homestead Farm, Ringsfield Road, Beccles

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Ringsfield and Weston Parish Council do not consider this site to be suitable due to the high agricultural land value and their desire to retain a clear boundary between Beccles and Ringsfield.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

Members of the public supported discounting this site as Ringsfield Rd is narrow; has poor visibility, and is close to a school making it unsuitable for access and increased traffic volume. Ringsfield Road does not connect with the Beccles Southern Relief Road and is also part of National Cycle Route no. 1. Respondents also commented that this site includes grade 2 agricultural land and wildlife habitat and development would be harmful to the rural landscape. Another respondent commented that there are surface water drainage issues.

How these comments have been taken into account in the Final Draft Local Plan

The comments supporting the discounting of the site have been noted.

The site has not been taken forward in the Local Plan.

036 Land at Cromwell Road and London Road, Weston

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Ringsfield and Weston Parish Council objected to development of this site as services and infrastructure are not available to support development and separation between Beccles and Ringsfield and Weston should be maintained.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Two members of the public supported allocation of this site as it has good road access; will not impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M& H Plastics. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site is considered less preferable to the sites allocated in the Draft Local Plan. The site has not been taken forward in the Local Plan.

044 Land at Sandpit Lane, Worlingham

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

Badger Building promoted the merits of this site including a sustainable location; availability for immediate development; and the opportunity for custom or self-build development.
Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is considered less preferable to the sites allocated in the Draft Local Plan which cumulatively deliver sufficient housing and on-site benefits. The site has not been taken forward in the Local Plan.

062 Land east of Ellough Road, Worlingham

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Worlingham Parish Council supported development of this site. The Parish Council stated a landscaped buffer could mitigate the impact on the listed building Worlingham Manor. Land containing landscaping or office uses could act as a buffer to protect proposed dwellings from the environmental impacts of nearby industrial sites to the east and south.

Worlingham Parish Council asserted that little weight should be given to the number of landowners involved when assessing the suitability of sites. There are other options available which do not involve the development of site 82 which would be harmful to the character and identity of Worlingham. The Parish Council contend that dispersed sites could deliver a new primary school via CIL or Section 106 agreements.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site would have a greater impact on heritage assets, specifically Worlingham Manor, than the allocated sites in the Draft Local Plan which would not require a strategy of mitigation works or boundary treatments. There is no guarantee that landscaping will be sufficient to mitigate the impact on the setting of the listed building. The rural setting of the building is important to its significance therefore any development on this site has the potential to cause harm.

The character and identities of Beccles and Worlingham have been considered by David Lock Associates in the master planning of the site WLP3.1 allocated in the Draft Local Plan. Development on the WLP3.1 sit is not considered detrimental to the character of Worlingham.

Dispersing development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services, facilities, and benefits to the local community. The site is considered less preferable to the sites allocated in the Draft Local Plan which cumulatively deliver sufficient housing, a school, employment, and local shops.

The site has not been taken forward in the Local Plan.

072 Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane)

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Members of the public objected to the development of this site as it belongs to the Beccles Fenland Trust. Respondents also objected due to poor access; the coalescence of Beccles and Worlingham; the loss of wildlife habitat; development in a flood risk zone; loss of sports fields; and potential impact on the Beccles Conservation Area.

How these comments have been taken into account in the Final Draft Local Plan

The comments supporting the discounting of the site have been noted.

The site has not been taken forward in the Local Plan.

107 Land to the East of London Road, Beccles

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Ringsfield and Weston Parish Council objected to development of this site as services and infrastructure are not available to support development and separation between Beccles and Ringsfield and Weston should be maintained.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

Members of the public supported allocation of this site as it has good road access. Other reasons included lack of impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M& H Plastics and agricultural fields. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site is considered less preferable to the sites allocated in the Draft Local Plan. The site has not been taken forward in the Local Plan.

108 Land to the east of London Road, Beccles (south of John Lawrence Close)

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public commented that there are surface water drainage issues with this site.

How these comments have been taken into account in the Final Draft Local Plan

The comments regarding drainage issues on site have been noted.

The site has not been taken forward in the Local Plan.

124 London Road, Weston, Beccles

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Ringsfield and Weston Parish Council objected to development of this site as services and infrastructure are not available to support development and separation between Beccles and Ringsfield and Weston should be maintained.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

Members of the public supported allocation of this site as it has good road access. Other reasons included lack of impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.

One person objected to the development of this site as it is an isolated greenfield site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M&H Plastics and agricultural fields. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The identities of Beccles and Worthingham have been considered by David Lock Associates in the development of the master plan for the site WLP3.1 allocated in the Draft Local Plan.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site is considered less preferable to the sites allocated in the Draft Local Plan. The site has not been taken forward in the Local Plan.

145 The Bull Field, Ringsfield Road, Beccles

Statutory Consultees

No comments were made in response to this site.
Parish and Town Councils

Ringsfield and Weston Parish Council do not consider this site to be suitable due to the high agricultural land value and their desire to retain a clear boundary between Beccles and Ringsfield.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Members of the public objected to the development of this site as Ringsfield Rd is narrow; has poor visibility; lacks a footpath; and is close to a school making it unsuitable for access and increased traffic volume. Ringsfield Road does not connect with the Beccles Southern Relief Road and is also part of National Cycle Route no. 1. Meadow Green is also unsuitable for access. Respondents also commented that this site includes grade 2 agricultural land, wildlife habitat, mature trees and development would be harmful to the rural landscape. Another respondent commented that there are surface water drainage issues.

How these comments have been taken into account in the Final Draft Local Plan

The comments supporting the discounting of the site have been noted.

The site has not been taken forward in the Local Plan.

174 West of Ringsfield Road, Beccles

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

Ringsfield and Weston Parish Council do not consider this site to be suitable due to the high agricultural land value and their desire to retain a clear boundary between Beccles and Ringsfield.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Members of the public supported discounting this site as Ringsfield Rd is narrow; has poor visibility, and is close to a school making it unsuitable for access and increased traffic volume. Ringsfield Road does not connect with the Beccles Southern Relief Road and is also part of National Cycle Route no. 1. Respondents also commented that this site includes grade 2 agricultural land and wildlife habitat and development would be harmful to the rural landscape. Another respondent commented that there are surface water drainage issues.

How these comments have been taken into account in the Final Draft Local Plan

The comments supporting the discounting of the site have been noted.

The site has not been taken forward in the Local Plan.

175 Land to the north of the Evergreens Garden Centre, Weston

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.
Members of the Public

Two members of the public supported allocation of this site as it has good road access. Other reasons included lack of impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M& H Plastics and agricultural fields. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site has not been taken forward in the Local Plan.

176 Land to the west of the A145

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.
Developers/Landowners

No comments were made in response to this site.

Members of the Public

Two members of the public supported allocation of this site as it has good road access. Other reasons included lack of impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M&H Plastics and agricultural fields. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site has not been taken forward in the Local Plan.

207 Land to the west of Evergreens Garden Centre, Weston

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Two members of the public supported allocation of this site as it has good road access. Other reasons included lack of impact on existing housing; and smaller sites developments are more in keeping with development outside of Beccles.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The site is located on the outskirts of the Beccles separated from existing residential areas by M& H Plastics and agricultural fields. Due to the remote location the site is not considered suitable for housing.

Scattering development and using small sites will not provide the number of houses in Beccles required by the overall strategy of the Draft Local Plan and will not provide the opportunity to for on-site services and facilities such as schools, local shops, and playing fields.

The strategy for rural areas supports small scale development that enhances or maintains the vitality of the rural settlements they are associated with. Allocating the sites on the outskirts of Beccles for housing would not support the rural strategy, village of Ringsfield or any other rural settlement. The site would therefore not be considered a suitable alternative to the allocated sites in rural areas.

The site has not been taken forward in the Local Plan.
Strategy for Halesworth and Holton

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

Halesworth Town Council is not opposed to the proposed developments in the Local Plan but is concerned about the impact that they will have upon local services and infrastructure. In particular the town council would like to make the following points:

- A lot more needs to be done to attract young people to live and work in the town.
- More employment land is needed to generate local job opportunities.
• Halesworth needs a secondary school – without it parents with teenage children will choose to live in other towns and villages.

• Planned population growth will put excessive pressure on secondary schools in nearby towns. Therefore it is necessary to provide a secondary school in Halesworth.

• A longer period of construction is needed to better enable infrastructure and services to adapt.

• Council housing and housing association housing is needed to rectify the imbalance in the town’s population.

• Priority needs to be given to the delivery of a community centre in a central and accessible location. This should house the town council, voluntary organisations and meeting rooms.

• The Town Council questions the rationale behind delivering a care home and sheltered dwellings as part of the healthy neighbourhood given the need to create a more demographically balanced population.

• There is concern regarding the delivery of outdoor sports facilities. Halesworth Playing Field Association was not consulted during the preparation of the draft plan and yet its ‘vision’ is described within the context of Halesworth Campus Ltd.’s and Halesworth Health’s plans. Reconsideration is necessary to optimise the use of resources and the benefits to the town. Halesworth Playing Fields Association must be party to any future discussions.

• Plans outlined in policy WLP4.1 will lead to the closure of the Apollo Youth Centre. There is no indication that alternative accommodation will be provided.

• Closure of the youth club will lead to the loss of facilities for teenagers who are not interested in sports. Lack of a policy means that this facility cannot be protected as an asset of community value.

• The Hopkins Homes development will lead to loss of the strategic gap and the rationale for this decision needs to be explained.

• Proposed development will increase the volume of traffic on local roads. The Town Council believes that this will create serious traffic management issues.

• Proposed development will stretch parking facilities beyond capacity.

• Road junction improvements will be needed to ensure the safety of pedestrians.

• Care attention should be paid to surface water runoff on all allocated sites. This is particularly important because the local topography makes Halesworth susceptible to flooding and this is an issue that only seems to be increasing.

• Development should include hard and soft landscaping to enhance visual appearance.
Other Organisations

Therese Coffey MP notes the enabling development that will deliver new health and community facilities. It is important that such land and facilities receive special designation in the future. There is concern in the community that, with the exception of the Campus, new housing development is not being adequately supported by an expansion in community facilities. Waveney District Council needs to provide greater clarity about how it will support community wellbeing. Halesworth Rifle Hall has failed to adequately serve as a community hall and there is a lack of such a facility in the town.

Cutler’s Hill Surgery is concerned about the implications for the town of the projected increase in the population and the implications for healthcare, particularly given that health facilities are under considerable pressure. The surgery draws attention to the following issues with regard to local healthcare provision:

- Halesworth is remote from the nearest general hospital.
- Cutler’s Hill Surgery is currently experiencing difficulty in recruiting new doctors. This will become an important issue with the projected increase in population (2500 people).
- Increasing GP workload has meant that the surgery has not been able to adapt to the needs of the increasingly elderly population who use primary care.
- The GP surgery will require expansion to cope with the increase in population and this will need to be fully funded. There is also concern about the future of the Patrick Stead Hospital Building.
- Access to the surgery from Bungay Road is quite restricted and this must be improved.
- Lack of resources is creating increasing pressure on local health services and some of the main issues are summarised as follows. Closure of the Patrick Stead Hospital has meant the loss of access to community inpatient beds. Loss of Outreach Outpatient services in March 2017. No mechanism for avoiding erroneous hospital admissions. Bureaucratic pressure on the District Nurse Service means this service is now badly restricted. Potential loss of the Rayner Green Service, which supports disabled people and their carers, would be a major blow. Voluntary care organisations are under increasing pressure.
- Lack of resources means that providing end of life care at home is proving very difficult. Consequently patients are admitted to hospital and cannot be discharged because there is no suitable care available at home.

In addition to the above Cutler’s Hill Surgery also raises the following points with regard to the local community:
There is a need to provide affordable housing for young people. Without this new development will attract older people.

The provision of a care home is welcomed but priority should be given to local people. The Care Commissioning Group should provide funding for 14 beds in the care home. A community care hub to replace the Patrick Stead Hospital is also welcomed.

The delivery of new sporting and educational facilities is supported but there is concern that the Edgar Sewter Primary School does not have the space on which to expand to meet additional need.

Funding for transport to hospitals is needed because local people are dependent upon voluntary provision.

New development should minimise car use and promote access for cyclists and pedestrians.

Development should use solar panels so as to minimise pollution.

Open spaces should meet the needs of wildlife and the community. They should also provide a pleasant environment to live in.

Ecological protection should be given full consideration in order to protect the environment and health. This includes protecting local hedgerows.

The Halesworth and Blyth Valley Partnership made the following points:

- Halesworth is located within a high quality environment and provides a range of services.
- The town has suffered from a lack of investment at the national and local level and this has led to relative economic decline.
- High house prices have meant this town has increasingly become a retirement community.
- To attract investment the town must provide adequate employment land, housing, schools, healthcare and sporting facilities.
- Removal of proposals for a new town is supported because this would have undermined existing centres.
- Provision of affordable housing is supported but this has to be accompanied by improved provision of schools, sports facilities and healthcare. This, in addition to more housing, will help to attract local employers.

The Morton Partnership has expressed concern that the proposed level of growth will place a greater burden upon already stretched services and facilities.
The Four Towns Crime Prevention Team has expressed concern about development on Hill Farm Road. Hill Farm Road is already cluttered with parked cars and is too narrow for construction vehicles. Site entrance points are also narrow and cannot accommodate large construction vehicles. Additional residential traffic will exacerbate congestion. An additional point of access directly onto Holton Road is required. Holton Road and Quay Street are already congested and cannot be served by double decker buses. Infrastructure issues have not been covered adequately. Improvements to the road network, sewerage, schools and bus services should all be completed before the proposed development can be delivered. The town centre should support local shops and provide free parking. Development should be accompanied by employment opportunities for all.

Developers/Landowners

Hopkins Homes supports the Council’s approach, which identifies Halesworth as a sustainable location for growth. However levels of growth suggested for Lowestoft are considered to be overly optimistic and rural growth is unsustainable. This means that more development is likely to take place in market towns. Halesworth could create several hundred more homes than those allocated and so Hopkins Homes wishes to promote its own site located to the west of Norwich Road (site 122), which is in a uniquely sustainable location.

Christchurch Estates note with regard to section 4 of the plan that the allocated sites and level of growth for Halesworth and Holton represent the minimum level of growth for the settlement and should not be represented as a finite target.

Richborough Estates recognises the role of Halesworth and Holton in delivering the Local Plan. Halesworth has good facilities, which can support growth beyond the level identified in the Local Plan. The settlement has good facilities and benefits from good transport connections, including regular trains to Ipswich and Lowestoft.

Members of the Public

In terms of the size and location of development the following concerns were raised:

- 740 new homes, which would deliver 1500 new residents, is too much for a town the size of Halesworth. There is no need for the planned new houses. There is concern that development on this scale will dilute the town’s character.

- Too many houses located on one site. There should be no more than 100 houses in any new development. Development should be dispersed across several smaller sites. Smaller sites such as numbers 76, 102 and 13 would be preferable. This would enable sympathetic infill development.

- Brownfield land should be favoured and new housing linked to local employment opportunities to reduce the need to commute.
• Town centre residential development would be preferable because it would help to support the role and function of the town centre it would also enable people to lead independent lives without using a car. The Volvo Garage is a possible site for future development.
• The large maltings building in the middle of the town should be retained and may be suitable for future residential use.
• There is support for playing field use on land to the west of Town Farm and low density residential development to the North of Town Farm – provided vehicular access is restricted to Harrisons Lane.
• Small properties are required to attract local people and help them stay in the area.
• Existing empty properties could be renovated.
• The current middle school site and Dairy Hill are the highest points in the town and construction on these sites will increase the risk of surface water flooding. There is concern that measures should be included to reduce flood risk.

In terms of provision of infrastructure there were a number of concerns were raised including:
• Infrastructure should be improved prior to development.
• There is concern that there is no guarantee that development of the middle school site will lead to improved playing field facilities.
• There is concern about the recent loss of the middle school and the Patrick Stead Hospital.
• Healthcare provision must be expanded to support the additional population. There are concerns that the town is located too far away from a hospital - Halesworth is located 25 miles form an accident and emergency centre.
• Dukes Drive does not have the capacity to support additional development. Saxons Way is also not large enough to accommodate extra traffic. There is also concern about the impact of development upon the junction between Hill Farm Road and Holton Road. The latter is very busy during peak travel times.
• Road access to the Chediston Street site will require improvement.
• Harrisons Lane is too narrow to accommodate additional traffic and the junction between Harrisons Lane and Norwich Road will require improvement.
• The cycle lane along Harrisons Lane should be protected.
• Organisations should be compelled to work together to ensure the delivery of adequate sports facilities.
• Edgar Sewter School has already been extended and there is no middle school to absorb the additional population. Further expansion could mean the loss of playing
fields. There is also a lack of evening activities for children. There is also a need for secondary education provision.

- Developer funding for infrastructure is pooled centrally by Waveney District Council and none of this money is spend in Halesworth.
- Increased use of healthcare will prove unsustainable for Halesworth.
- More town centre car parking is needed to support development.
- Chediston Street will require improvement to accommodate additional traffic arising from development.
- A transport plan is needed, given the dearth of existing provision. Twice hourly trains to Ipswich are needed, particularly at peak travel times, as well as a bus service to Ipswich.
- There is an abundance of poorly maintained play areas, which have become places of anti social behaviour. Larger play spaces, which include cafes, toilets and indoor play facilities, will benefit the wider area and not just the immediate development.

Concern was raised that the four year construction period for development on Hill Farm Road will inflict noise, inconvenience and health issues on local residents for an unacceptable period of time. It was suggested that access to site works will be along Hill Farm Road, which will exacerbate this issue. There was concern that measures should be put in place to limit impact upon local residents, including controlling the hours of operation.

It was suggested there are no jobs to support residential development and residents will have to work elsewhere.

It was suggested house prices are too expensive for local people to afford. Only second home owners can afford local properties. Another respondent suggested affordable housing provision should be weighted towards shared equity housing noting high house prices and low wages mean that young people leave the area. They noted that shared equity has the advantage of creating a sustainable community, rather than introducing residents who are dependent on others.

It was suggested that there will not be enough employment opportunities for the extra residents, who will have to commute to other towns.

It was stated there is a need to ensure that the nursing home proposed for the middle school site is retained as a C2 use class. Clarity is needed with regard to who will be responsible for ensuring that these uses are delivered.

It was suggested there is a need to encourage the creation of new shops and to encourage existing ones. This includes provision of a second local supermarket which would benefit the younger population.
There were complaints that the consultation event took place when people are returning from work and looking after their children. There is also only one poster for the Halesworth area with everyone crowded around it. It was suggested that plans lacked context and were difficult to understand.

It was stated that Halesworth is never mentioned in ‘In Touch’ and there are no reports from the Halesworth County Councillor, creating a sense that the town ‘does not exist’.

**How these comments have been taken into account in the Final Draft Local Plan**

Waveney District Council will work with Suffolk County Council Highway Authority to ensure that all new residential and employment allocations are adequately served by the road network and provide safe access for motorists, cyclists and pedestrians.

The mixture of houses on all residential allocations will provide housing for a range of age groups and so attract younger residents, as well as providing for the needs of elderly residents.

The Halesworth Healthy Neighbourhood development will deliver new accommodation for the youth club in addition to better sports facilities. Halesworth Playing Field Association has been acknowledged as a separate independent organisation.

The Council will also work with Suffolk County Council to ensure that new residential development is adequately serviced by pre-school, primary and secondary school provision. The Council will work with the Clinical Commissioning Group to ensure the delivery of new healthcare facilities as part of the Halesworth Healthy Neighbourhood.

**Infrastructure**

**Statutory Consultees**

No responses were received in response to this section.

**Parish and Town Councils**

Halesworth Town Council identified Halesworth as a market town that provides a range of shops and facilities and needs to meet the needs of local people. To that end the Town Council made the following points:

- Improved car parking is needed to absorb additional housing. It is noted that there is currently no on street parking.
• The Thoroughfare should be completely pedestrianised.
• Public transport is limited. There is a heavy dependence on Halesworth Area Community Transport (HACT), which is staffed by volunteers. It would be useful if a developer contribution would enable this service to be expanded to include allocated development sites.
• Car parking should take priority over the provision of cycle routes (although the latter is a laudable aim).
• Hill Farm Road should be linked with cycle access across Millennium Green and Town Park so that cyclists can avoid the busy Holton Road.
• Pedestrian access requires improvement and could be combined with new cycle routes.
• Lack of a secondary school will hamper efforts to address the demographic imbalance.
• Healthcare is a major concern. Cutler’s Hill Surgery will require a major investment to meet the current needs of the ageing population and the additional needs created by new development.
• The proposed increase in population raises the need for a new community centre.
• The loss of the Apollo Youth Centre after its lease expires will increase problems with anti social behaviour.
• Improvements to the sewage network are required.
• Broadband should be provided as standard to all new developments.

Other Organisations

Halesworth Playing Field Association writes in relation to the information on page 97 and that detailed in allocation WLP4.1. The HPFA states that it is not involved in the development of the Halesworth Healthy Neighbourhood and is concerned that the division of sports provision between two separate providers will be both wasteful and lead to confusion. The HPFA has for more than 60 years been the sole provider of sports facilities in the town and has the expertise, teams and contacts to run a multi disciplinary sports complex.

Halesworth and Blyth Valley Partnership is concerned about the lack of detail about how primary school provision in Halesworth and Holton can be expanded. Loss of playing fields would be detrimental to both schools and parking problems at both schools would be exacerbated. Road infrastructure should be improved and phase 2 of the relief road should be revisited before any future expansion of the town is considered. Halesworth lacks a cohesive strategy to attract and encourage businesses within the town and this is crucial in preventing the town from becoming a retirement settlement. The sewage system must be expanded to support new development and the
bridge at the Thoroughfare must be improved and altered to prevent a future flood event from occurring.

Beccles and Bungay Cycle Strategy welcomes the inclusion of schemes to improve the cycle network as identified in the Waveney Cycle Strategy.

Halesworth Health has expressed concern about the ability of local healthcare providers to cope with the proposed increase in population. It is vital that healthcare and education facilities match the age profile of users. Currently many healthcare providers have had to reduce services and are struggling to cope with demand as the examples below will illustrate:

- Acute healthcare facilities are located 30 miles away: this takes 1 hour each way by car; by public transport it can take half a day to access services. Therefore local service provision is essential.
- There is no out of hospital service to prevent hospital admissions meaning that it is a struggle to keep people at home. As a result they end up in overcrowded acute hospitals.
- Outpatient facilities have been reduced. Consultant consultations in Halesworth have ceased.
- Rayner Green, which supports those with dementia or a severe disability, is under review and only providing a reduced service.
- Cutler’s Hill must expand to cope with the proposed population increase – this is acknowledged in the Local Plan. However this must be funded and matched by adequate staff recruitment.
- Castlemeadow Care’s proposals for the Campus site are welcomed and will provide nursing and residential home beds, dementia care, NHS community funded beds and a community hub providing community healthcare.
- Support for Halesworth Campus: sports facilities are currently restricted and increased provision will help to include mental and physical health and to reduce health problems and illnesses.
- Support for the skills centre, which it is hoped will include some healthcare training.
- Integrated healthcare will work well with the information and support centre, which is proposed for Cutler’s Hill and will support people with life-changing illnesses.

Developers/Landowners

No responses were received in response to this section.
Members of the Public

Members of the public raised the following issues about infrastructure provision:

- Delivery of infrastructure improvements must be agreed prior to development.
- Secondary education should be provided in Halesworth before future development is permitted.
- The sewage network will require improvement to cope with new development. Reference made to a burst sewer in Bramfield Road.
- There is concern about pressure on local health services. Cutlers Hill doctor’s surgery will need to be expanded. Consideration should be given to the difficulty in training and recruiting medical staff. There is a need for an NHS dentist, as well as more details about the expansion of Cutler’s Hill Surgery. There is a need for better access to accident and emergency facilities, as well as outpatient services.
- Primary educational provision is oversubscribed and will require expansion – but it is not clear where this will happen. The number of children estimated to join schools in Halesworth has been underestimated. There is a need for a new secondary school as well as pre school facilities. There need to be more evening activities for children.
- There is no evening bus service.
- There is a need for single age classes in primary schools in order to lift educational attainment and to attract specialist teaching staff.
- There is concern that Halesworth Police Station has been shut. Voluntary library staff members have had to deal with an increasing amount of anti social behaviour.
- Additional car parking is needed to accommodate new housing development.
- Clarification is needed with regard to site WLP6.2 as to where the access point will be located. There are already issues with speeding motorists approaching the junction between London Road and Roman Way and this will only be exacerbated.
- There is a need for a new swimming pool (including a children’s pool). The size of pool currently proposed (20 metres) is inadequate. People currently have to travel to Leiston to go swimming. Some people are unable to use gyms or play sports for exercise and so access to a swimming pool is important.
- Better control of surface water flooding is needed. Millennium Green and The Thoroughfare recently had raw sewage flowing through them.
- The road network cannot cope with proposed development. Harrisons Lane is narrow and with a very tight junction with Norwich Road. There are poor sightlines at an intersection with Bungay Road to the north. This is particularly serious because buses now use Harrisons Lane. Holton Road is already busy, particularly during peak times.
- Green infrastructure improvements include the restoration of ponds and the Green Lane which runs along the south eastern edge of WLP4.1 and connects with Bungay Road.
- Principal bus stops should include off road parking bays to reduce congestion.
- Better railway linkages are needed to Liverpool Street and Norwich.

It was questioned as to what proportion of the houses will be affordable.

It was questioned as to whether consideration has been given to waste disposal. Currently residents can only take household waste to disposal sites in Leiston and Lowestoft.

It was suggested there should be a phased approach to development with Site WLP4.1 built first because of the key infrastructure improvements that it will bring. It was suggested time should be given for the increased population to be accommodated before any more development is then built.

It was suggested that a new out of town supermarket is needed to support young families. A possible site would be next to the Spectra packaging site or Bernard Matthews.

It was noted there is a need for more local employment as well as transport to areas that provide employment.
How these comments have been taken into account in the Final Draft Local Plan

Delivery of the Halesworth Healthy Neighbourhood will provide new health facilities that will help to replace those lost through the closure of the Patrick Stead Hospital. The Council will work with the CCG to ensure that new development is adequately served by health facilities.

Halesworth Healthy Neighbourhood will deliver new sports facilities and a youth club.

The Council will work with Suffolk County Council to ensure that there is adequate preschool, primary and secondary educational provision for the additional children who are expected to live in Halesworth.

The Council will work with Suffolk County Council to ensure that new housing is served by adequate access for motorists, cyclists and pedestrians. Car parking will be provided in accordance with guidance set down by Suffolk County Council.

The text has been altered to acknowledge the status of Halesworth Playing field Association as an independent organisation.

Policy WLP1.4 of the Local Plan will ensure new development is supported by adequate sewerage network provision.

Policy WLP4.1 – Halesworth / Holton Healthy Neighbourhood

Statutory Consultees

Suffolk County Council notes that there is no reference to archaeological work and therefore an upfront archaeological assessment will be required to accompany any planning application. This requirement should be referenced in the site policy.

Suffolk County Council states that main access to the site should be provided from Norwich Road and Harrisons Lane, together with sustainable transport links. Transport assessment required.

Historic England notes that Town Farm, a grade II listed building, is located within the area covered by policy WLP4.1. Formerly called Pest House Farm, it was used as a small pox isolation hospital. There is concern that consideration of the farm and its setting does not appear in the text. There is no evidence that a heritage impact assessment has being undertaken. This should assess whether any development is possible, the potential impact on the heritage asset, possible mitigation measures and the quantum of development that could take place. Without the assessment it is not possible to include this site allocation within the Local Plan.
Parish and Town Councils

Halesworth Town Council notes that Dairy Hill is part of allocation WLP4.1, even though the Halesworth Playing Field Association was not party to any discussions about the allocation. It is therefore questioned how the ‘vision’ of the HPFA can be known without any discussions taking place. This issue needs to be revisited and the HPFA included in future discussions. This will enable a more balanced approach to the provision of sports facilities and the optimum use of existing facilities, as well as the provision of a wide range of different facilities. Play areas should be well planned and overseen with interesting landscaping and a range of equipment for people of all ages. Tree and shrub planting must be used creatively so as to enhance the appearance of development and build on the work of Halesworth in Bloom. Harrisons Lane will require major improvement to accommodate development, which will result in at least 350 cars using the lane. Loam Pit Lane is a pinch point and exits onto Holton Road at a tight junction. Visibility is reduced by parked cars on one side and the railway bridge on the other. This is not a safe exit for cyclists. There is no guarantee that the NHS will fund services at the proposed care home and so it cannot be considered as a replacement for the Patrick Stead Hospital.

Other Organisations

Halesworth Health supports the Halesworth Campus project. This will improve physical and mental health and will increase the range of services that physiotherapists can use to help their patients. In the long term a swimming pool would also be very beneficial. The site should be connected to cycle and pedestrian routes through the town. The skills centre is an important part of the project and has the potential to delivery training in both sport and healthcare.

Suffolk Wildlife Trust cautions that the current ecological value of the site has not been established. Without a baseline understanding the ecological value of the site it cannot be determined whether it is suitable for development. Therefore further ecological investigation is needed before any decision is made. Any planning application should be supported by an ecological assessment and development should include measures to mitigate biodiversity impact and secure significant ecological enhancements.

The Halesworth Playing Fields Association (HPFA) would like to know how development of the Halesworth Campus site will help to deliver improved facilities at Dairy Hill as the organisation is not currently involved. The HPFA has its own development plan, which it is starting to implement. Money from the development of the Campus would accelerate this implementation process, which would in turn aid in the delivery of the objectives in WLP4.1. It is suggested that the field opposite Dairy Hill, which is proposed to compensate for the loss of existing playing fields to development, should be transferred to the ownership of the HPFA, which could make immediate use of the field and support the increasing number of teams requiring pitches. If the HPFA is mentioned in text...
supporting allocation WLP4.1 it must be identified as a separate organisation to Halesworth Campus Ltd. Any development must incorporate the HPFA’s vision and ensure that its business plan objectives are achieved. The objectives are not in conflict with WLP4.1 but the HPFA intends to remain as a separate charity with the objective of providing a range of sports facilities for local people.

Dairy Hill is located outside of the boundary for WLP4.1 and so it will play no part in the implementation of policy 4.1. In addition the HPFA is concerned that the photographs of Dairy Hill give an inaccurate impression of the quality of the sports and changing facilities there. The HPFA will supply more accurate photos for the final plan.

The Halesworth and Blyth Valley Partnership expressed the following concerns:

- More work about financial viability is needed with regard to the cost of improving the junction between Harrisons Lane and Norwich Road. Surface water flood risk issues will also need to be mitigated.
- Will the proposed healthcare facilities meet the needs of a growing community and will the CCG commit to provide NHS beds and facilities?
- The Campus proposal includes the loss of a flat playing field next to the skills centre to be replaced by a sloping site with power lines running across it. The cost of levelling the site will threaten the viability of the scheme. Existing tennis courts at Dairy Hill are identified by the Green infrastructure Strategy as having adequate capacity to meet local needs. It therefore does not make sense to provide additional courts, which would fragment provision and undermine existing providers. Consideration should be given to the future of the Basley playing field on Bramfield Road, which is isolated from main sports provision in the town.
- The accommodation of community organisations at the skills centre should not come at the expense of providing vocational training. The Apollo Youth Centre must also be protected due to the lack of alternative provision for young people in the town.

Sport England supports the proposed scheme in principle but adds that it must comply with its policy document ‘A Sporting Future for the Playing Fields of England’. All new sports facilities and playing field facilities will need to comply with Sport England technical guidance and quality performance standards. All new facilities must provide storage facilities, changing rooms and car parking. New artificial grass pitches must be floodlit and subject to hours of use conditions that maximise benefits to local sport.

Developers/Landowners

Suffolk County Council, as part owner of the site, supports policy WLP4.1.
Halesworth Campus and Castlemeadow Care indicated they have been working to develop a mixed use scheme that will include sports facilities, a care home and healthcare facilities, some of which will replace those lost with the closure of Patrick Stead Hospital. Two public exhibitions have demonstrated strong public support. This is a complex scheme that is nearing fruition and it is hoped that a planning application can be submitted towards the end of 2017. The organisations welcome the support provided by policy WLP4.1 and believe that all aspects outlined in the policy are deliverable. However it is requested that the masterplan be amended so that the healthcare element of the scheme includes all of the land owned by Castlemeadow care.

Richborough Estates supports the delivery of 125 dwellings prior to the delivery of the 3G pitch because it enables the frontage along Harrisons Lane to be delivered, will be more attractive to developers and will help to bolster the Council’s 5 year supply. Richborough Estates has developed as masterplan, which includes 215 dwellings, landscaping and open space. Richborough Estates stated that development on the site will retain the existing field structure and will be designed so as to relate to the existing landscape and include green infrastructure and links to public rights of ways. They noted the site is well contained by existing hedgerows and vegetation along its eastern edge which will be retained and which will prevent any feeling of coalescence with Holton. They noted that highway access to the site will be designed so as to maximise permeability and to accord with the surrounding landscape. They noted that work is needed to strengthen the local gas network there are no insurmountable issues and Anglian Water have indicated that it will be possible to provide both drinking water and foul sewerage connections to the site.

Members of the Public

Members of the public raised a number of general issues in relation to the proposed development. They state that the proposed development on this site is too large and will create excessive pressure on local public services, including schools and healthcare. There is also concern that development would erode the strategic gap between Halesworth and Holton and that development would be made up of bland designs that do not respect the surrounding landscape. The density of development was considered too high and should be 20/25 dwellings per hectare, rather than the proposed 30 dwellings per hectare.

It was suggested that the scale of development proposed will increase problems with traffic congestion and speeding vehicles. In particular it was suggested, this will create road safety issues for pedestrians and cyclists. Proposed sports development will create noise and disturbance for local residents.

Members of the public also made the points below, which relate to specific issues.
• Loam Pit Lane must not be used for access – including cycle access – in its current form. However Loam Pit Lane could provide cycle access if it was resurfaced.
• Roman Remains potentially exist on this site, which should be investigated prior to development.
• Odour from chicken sheds could create a nuisance and might exceed Environment Agency limits.
• The trigger for the delivery of the 3G pitch should follow the 25th occupation of a new dwelling. This would reduce delivery time to two years, not four to five years at present. This is important because Halesworth needs sports facilities, which are currently lacking, to create a sense of community.
• Smaller children’s play spaces, such as those on the Campus site, are little used with poorly maintained equipment. It would be better to develop smaller playing spaces and focus equipment on larger better used sites such as Town Park, which is accessible to surrounding residential areas.
• There is concern that covenants restricting the use of the playing fields to sports use only have been lifted.
• Secondary education must be provided in the town in order to restore the demographic balance in the town. It is not sustainable to transport additional children to secondary school in Bungay. An older population would place an increasing burden on local healthcare services.
How these comments have been taken into account in the Final Draft Local Plan

A Heritage Impact Assessment is being prepared by the landowners. It is considered possible that the quantum and mix of development can be accommodated without causing a level of harm to the listed building which isn’t outweighed by the benefits of the development.

A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site. Transport modelling in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) does not identify any congestion issues in Halesworth.

The Policy for the site has been amended to require archaeological investigation to be completed as part of any future planning application. A Heritage Impact Assessment will also be completed prior to any planning application being submitted.

The Policy for the site has been amended to require an ecological assessment to be completed as part of any future planning application.

The chicken sheds are covered by the allocation and are unlikely to be retained through redevelopment.

Provision of a youth club and vocational training will be included in the new Campus proposals.

The text has been amended to acknowledge the status of Halesworth Playing field Association as an independent organisation.

Policy WLP8.30 on open space design will ensure that play areas are located and designed in a safe way. Landscaping and tree planting will also be undertaken so as to minimise landscape impact from the development.

The trigger for delivery of the 3G pitch will remain the completion of the first 100 dwellings to ensure viable delivery of the scheme.

Smaller play spaces are more accessible for local residents of the Halesworth Healthy Neighbourhood and so will be retained within the scheme.
Policy WLP4.2 Land adjacent to Chediston Street, Halesworth

Statutory Consultees

Suffolk County Council stated the site is within a Minerals Consultation Area. They added that the County Council will 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. Suffolk County Council states that main access to the site should be provided via the improved junction between Chediston Street and Roman Way. There should also be sustainable links to the existing pedestrian and cycle network. Transport assessment required.

Parish and Town Councils

Halesworth Town Council notes that this site is located upstream of Halesworth and cautions that surface water must be safely disposed of in order to reduce the risk of flooding in the town itself. Access in the north east corner of the site will encourage those visiting the town centre to make their return journey via Chediston Street, which is narrow and a conservation area. Moving the site entrance towards the south east corner of the site would encourage more traffic to travel along London Road.

Halesworth and Blyth Valley Partnership states that the site has good road access along Roman Way and to the town centre and could form a well planned westward extension to the town. Careful design and landscaping is needed at the application stage in order to minimise landscape impact. Surface water runoff must be addressed and development density should not be increased.

Other Organisations

There were no responses to this site / policy.

Developers/Landowners

Christchurch Estates draws attention to the application recently submitted to the Council for consideration. The representation supports this application and demonstrates that the site is suitable, deliverable and available for residential development. They noted the site is located 600 metres from the town centre and is well connected to services, facilities and employment opportunities. The site is not located in a fluvial floodplain and is considered to be at low risk from surface water flooding. They noted surface water will be managed by attenuation and controlled discharge, in line with industry best practice. SUDs will be utilised to help control surface water on the site. They added that development will be designed and landscaped so as to minimise impact.
upon the surrounding landscape. There will be a vegetated boundary along the western edge of the site, which will also be kept free from development. Natural features will be retained to enhance landscaping. Houses on the highest parts of the site will be limited to 1.5 storeys so as to reduce landscape impact. They noted the ecological assessment has indicated that the site is of little ecological value and that development would not cause any harm to local wildlife habitats. They noted the criteria set out in Policy WLP4.2 are considered to be deliverable and achievable and will be incorporated into the design and development of the site.

Hopkins Homes states that development on site number 122 would be preferable to site WLP4.2 because it would have less impact upon the surrounding landscape. In addition site 122 is also located close to local shops, services and facilities.

**Members of the Public**

One member of the public states that site 13 (Fair View Farm) is preferable to WLP4.2 as it does not contain any archaeological content or contamination or surface water issues, is better contained in the landscape and benefits from good access straight onto Norwich Road. They noted development on site 13 will not lead to urban sprawl because it does not cross any natural settlement boundaries in the landscape, such as Roman Way.

There is concern about impact upon the landscape caused by development and that the proposed site allocation policy does not sufficiently mitigate this.

Concern was raised that the proposal will lead to congestion along Roman Way and Chediston Street and there is only one point of access onto the site, which is inadequate.

It was suggested that development will add another 800 patients to the list at Cutler’s Hill Surgery, which is already overloaded. It currently takes two weeks to see a doctor.

There were concerns that proposed development will increase pressure on local schools.

It was suggested that new housing will lead to loss of view for existing residents as well as overlooking which will negatively impact on property values.

It was suggested that pedestrian and cyclist safety will be impacted, particularly for school children.

Concern was raised that development will exacerbate issues of surface water flooding for existing properties on Roman Way.

It was stated that new housing will create issues with noise and light pollution.
Concern was raised about the impact on local bird and wildlife populations. Part of this will be caused by an increase in the number of domestic cats.

It was suggested that part of the site contains spoil from a previous development, which raises issues about ground stability.

Concern was raised that the proposed development will increase pressure on the local sewer network.

It was suggested that an additional road is needed to connect the western edge of the new development to Dukes Drive. This would provide an alternative route to those travelling towards Walpole.

It was suggested that the development must cater for the needs of elderly residents as well as local families.

**How these comments have been taken into account in the Final Draft Local Plan**

Reference to the Minerals Consultation Area has been added to the supporting text.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site Transport modelling in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) does not identify any congestion issues in Halesworth.

The planning system cannot guarantee that development will not occur in future, nor can it prevent the loss of property values.

The Policy requires a landscaping scheme which will reduce the harm of the development on the landscape.

The policy has been amended to include a requirement for an ecological assessment.

This site is preferable to site 13 because it would form a natural extension to existing residential areas to the east and south. Development on this site would also have good access to the town centre.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.
Policy WLP4.3 Land north of Old Station Road

Statutory Consultees

Suffolk County Council states that no more than ten dwellings can be served by Old Station Road and that the site should be linked to existing footpaths.

Suffolk County Council states that there is a sensitive watercourse to the north of this site. Discharging via this water course must result in betterment on pre development runoff rates.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

Halesworth and Blyth Valley Partnership supported allocation WLP4.3 but cautioned that the junction between Wissett Road and Norwich Road is already a pinch point and there are road safety issues at the Edgar Sewter Primary School.

Developers/Landowners

There were no responses to this site.

Members of the Public

Members of the public raised the following issues:

- Wissett Road is already heavily used because to the lorry depot on Wash Lane and the junction between Wissett Road and Norwich Road is already congested.
- Traffic travels excessively quickly along Wissett Road down the hill behind Edgar Sewter Primary School.
- There is a flood plain to the south of Wissett Road and more housing will exacerbate surface water flooding.
How these comments have been taken into account in the Final Draft Local Plan

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access for 10 dwellings cannot be achieved to this site.

Policy WLP4.4 – Land west of Lodge Road Holton

Statutory Consultees

Suffolk County Council notes that there is no discharge strategy for the site. Soil conditions for infiltration are marginal, there are no watercourses and no Anglian Water surface water system.

Parish and Town Councils

There were no representations in response to this site.

Other Organisations

There were no representations in response to this site.

Developers/Landowners

There were no representations in response to this site.

Members of the Public

Concern was raised that the proposed height and gradient of the new properties will lead to overlooking and loss of privacy, as well as loss of outlook.

Concern was raised about the impact on infrastructure, including the sewerage system, primary school and GP surgeries.

Concern was raised about the increase in traffic including fumes and odour, and the impact this will have upon existing properties.
It was suggested that existing residents were not informed about this proposal when they bought their houses. Concern was raised that residents will lose their view of the countryside and this will lead to a reduction in property values.

It was suggested that 15 new dwellings will increase noise.

It was suggested that construction work will cause disruption for local residents, particularly those with young children.

It was suggested that development will increase runoff and lead to the flooding of existing properties.

It was suggested that Site 87 is preferable because it is closer to services and employment opportunities and would have less impact upon existing residential areas.

It was suggested that development should not occur where there is not enough for young people to do in their spare time.

It was noted that Halesworth and Holton are only served by one supermarket, which is expensive.

**How these comments have been taken into account in the Final Draft Local Plan**

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

Impact on existing property prices is not a material planning consideration and cannot be taken into account in the preparation of a Local Plan.

Loss of private views over the countryside is not a material planning consideration and cannot be taken into account in preparing the Local Plan.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

This site is preferable to site 87 because it is shielded in the landscape behind an existing development directly to the south.
Policy WLP4.5 Broadway Farm

Statutory Consultees

Suffolk County Council states that the wording regarding archaeological investigation is sound but adds that in light of the site’s reduced area, which is smaller than that considered at the Issues and Options Stage, archaeological investigation could be undertaken under a condition on consent of planning application for this area.

Suffolk County Council states that access would require improvement, particularly to visibility and width, to enable increased use. Transport assessment required.

Suffolk County Council notes that there is a pocket of surface water flooding along the south of the site.

Parish and Town Councils

Halesworth Town Council states that safe, off-road access is needed for cyclists and pedestrians. It will also increase accessibility for local residents who wish to access the town centre. The Broadway Farm proposal only permits limited development; however, major industrial development on this site is required to correct the demographic imbalance in the town.

Other Organisations

Suffolk Wildlife Trust cautions that further work is necessary to ascertain the site’s biodiversity value and to evaluate whether or not it is suitable for the proposed development. Any planning application must be supported by an ecological assessment and must include measures to mitigate impacts on and secure benefits for local habitats.

Halesworth and Blyth Valley Partnership supports the statements in WLP4.5 and WLP8.13. With the creation of 740 new houses it will become vital to ensure that new employment land at Broadway Farm is delivered.

Developers/Landowners

The landowner notes that the site is allocated in the current Local Plan as site specific allocation HAL2. High set up costs are the likely reason why this site has remained undeveloped. However it is questioned why the New Local Plan has reduced the area of this site, particularly in view of the likely increase in population that Halesworth is expected to experience. This is particularly the case given the commitment in the New Local Plan to create new employment opportunities in Halesworth. They suggested that it would be better to reinstate the whole of site specific allocation HAL2 but this
time with retail along the road frontage. This could include a supermarket or fast food outlet. This would enable the development of more traditional employment uses to the rear of the site. They included a sketch map to illustrate the proposals. They noted that in allocating only the front of the site the present residential occupier would be enclosed in an industrial estate – which is unacceptable. They noted there is interest in developing the site but a negative planning approach and infrastructure costs means that this hasn’t occurred. They noted the Co-op in Halesworth has a monopoly on local retail meaning that its prices are higher than at competing supermarkets. This is not sustainable and therefore competition is needed. They stated that access can be provided more cheaply via a T junction with a ghost island for vehicles turning right of the A144. They noted the area under the power cables would only be suitable for parking.

Members of the Public

One member of the public responded, who supported the reference in the policy to pedestrian and cycle access. They suggested archaeological investigation should be done in cooperation with Halesworth and District Museum who have developed archaeological strategies and are currently involved in a planned dig in Wissett.

How these comments have been taken into account in the Final Draft Local Plan

Issues relating to access will be considered during the planning application process. This will include the provision of safe access for pedestrians and cyclists.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

The proposed allocation for Broadway Farm is in accord with the need for employment land in Halesworth during the life of the Local Plan, as identified by the Council in the employment land needs assessment.

Any planning application on this site will be required to include an ecology assessment completed by a suitably qualified person.

Retail development on this site would not be acceptable because it is contrary to national planning policy and there is the potential for significant negative impact upon Halesworth town centre.
Alternative sites

Site 13 Fair View Farm, Norwich Road

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public wrote in support of site 13, examining the reasons given why the site was discounted. They noted that Site 13 would not encroach into the countryside any more than any of the allocated sites, impact a nearby listed building is not certain and biodiversity impact is only a minor negative. They noted the draft Strategic Housing and Employment Land Availability Assessment did not identify any constraints that cannot be mitigated. This site is also well connected to a range of local services and employment opportunities, although WLP4.2 may be closer to the town centre. They noted a number of issues with WLP4.2 in terms of archaeology, historic town dump, highway issues, landscape sensitivity, and urban sprawl.

Two other members of the public urged the consideration of smaller sites next to Sparrowhawk Road, including sites 13, 76 and 102. It was noted that Sparrowhawk Road is underused and has good access to the town and nearby employment sites. Developing these sites would result in less disruption for residents of existing housing.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.
The Chediston Street site is located closer to Halesworth town centre than site 13 and would form a more natural extension to existing residential areas than site 13. Work will be taken as part of any planning application on the Chediston Street site to minimise landscape impact. The Chediston Street site will also be surveyed for archaeological content and a mitigation scheme will be provided where necessary. It is therefore considered that the Chediston Street site is preferable for residential development.

Site 14 – Field at Saxons Way

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

The Landowner made the following points:

- Flood risk assessment indicates that 4450 metres of the site are suitable for development.
- Electrical cables running across the field could be diverted under the ground.
- The sewer crossing the site could be re-routed.
- The field is mown and can be accessed for viewing.

Members of the Public

Two members of the public replied with the following responses:

- Concern that this site appears to be part of the Town Park.
- Smaller sites, including site 14, would be preferable to site WLP4.2 because of its location on high ground.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Site 14 is not considered suitable for development because of issues of flood risk and landscape impact. A sewer pipe and electricity lines crossing the site would also need to be re routed.

Site 76 – Land North of Sparrowhawk Road

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public urged the consideration of smaller sites next to Sparrowhawk Road, including sites 13, 76 and 102. Another noted that Sparrowhawk Road is underused and has good access to the town and nearby employment sites. Developing these sites would result in less disruption for residents of existing housing.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.
Site 76 is not considered suitable for development because it is poorly connected to the existing built up area and is poorly connected to residential areas.

**Site 86 – Land at off Saxon’s Way**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

Badger building states that this site could be developed in tandem with the neighbouring site 14. The site is located close to the town centre and development would not impact upon the surrounding area. It would be ideal for self build and a developer led scheme could provide access and serviced plots. Development would complement development on the other side of Saxons Way, which is already allocated for housing.

The landowner drew attention to Anglia Water’s requirement that surface water should be dealt with through a sustainable drainage system. The developer will ensure that this is put in place. Housing on this site should be able to link up with the sewage network used to service existing dwellings. They disagree with the claim by Historic England that development will impact upon the setting of Gothic House. They added landscaping would help to screen new development and minimise impact. The landowner questions the amber alert listed by Suffolk County Council Archaeology. The service has not previously raised any previous concerns and previous developments on the corner of this site met with no objections. The developer would ensure careful and original design, which is needed on this unusual site. In response to concerns form the Halesworth and Blyth Valley Partnership on the grounds that this site is part of the phase 2 relief route the landowner states that other development has already taken place along this route, which cannot now be removed. There will be no impact on species and habitats or species of value, as noted by Suffolk Wildlife Trust, because the site is due to be cleared of undergrowth. They noted that development on this site would have a significant positive impact because it is located close to
the town centre, school, bus and rail transport. They noted that development on this site would benefit both the young and old, who may have mobility issues and need to live close to the town centre.

Members of the Public.

One member of the public stated that smaller pockets of development on sites 115, 116, 160, 86, 14 and 106 might be preferable to site WLP4.2, which is located on high ground.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Site 86 is an unusual shape and is located within close proximity to the sewage works, which means that could only deliver a limited amount of new housing. In addition development on the site would also have a negative impact upon the surrounding townscape.

**Site 87 – Land on Bungay Road, Holton**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

No comments were made in response to this site.
Members of the Public

One member of the public questioned why this site has been discounted when it is located closer to shops, services and employment opportunities than site 89. This site would also have had less impact on surrounding residential areas due to its location.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Site 87 was not considered suitable for allocation because there are alternative sites that are located closer to shops and services.

Site 102 – Land South of Sparrowhawk Road

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public urged the consideration of smaller sites next to Sparrowhawk Road, including sites 13, 76 and 102. Sparrowhawk Road is underused and has good access to the town and nearby employment sites. Developing these sites would result in less disruption for residents of existing housing.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Site 102 was not considered suitable for allocation in the Local Plan because of potential landscape impact and concerns about road access. The size of the site exceeds the amount of employment land needed in Halesworth during the life of the Local Plan.

Site 106 – Land to the north of 34-48 Old Station Road

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public stated that smaller pockets of development on sites 115, 116, 160, 86, 14 and 106 might be preferable to site WLP4.2, which is located on high ground.

How these comments have been taken into account in the Final Draft Local Plan

This site has planning permission for housing and so is no longer included in the plan making process.
Site 115 – Land to the west of Halesworth (Block1)

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

No comments were made in response to this site.

Members of the Public

Concern was raised that the site is grade 2 agricultural land and so development should not be permitted.

It was noted the site has less impact on the landscape than site WLP4.2 because there is less height difference between the site and surrounding dwellings.
It was stated the site is not located too far from the town centre and residents could walk, use their car or the local bus service to access the town centre.

Concern was raised that development would increase the risk of surface water flooding, devalue local homes, remove views of the countryside and create congestion.

It was noted development of this site would reduce the gap between Halesworth and Walpole.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.
This site has not been allocated in the Local Plan because it is likely to have a greater landscape impact than some alternative sites. It is also located further from the town centre and educational facilities than alternative sites and is partially located on high grade agricultural land.

**Site 116 – Land to the west of Halesworth (Block 2)**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

No comments were made in response to this site.

**Members of the Public**

Concern was raised that the site is grade 2 agricultural land and so development should not be permitted.

It was noted the site has less impact on the landscape than site WLP4.2 because there is less height difference between the site and surrounding dwellings.

It was stated the site is not located too far from the town centre and residents could walk, use their car or the local bus service to access the town centre.

Concern was raised that development would increase the risk of surface water flooding, devalue local homes, remove views of the countryside and create congestion.

It was noted development of this site would reduce the gap between Halesworth and Walpole.
Concern was raised that the site is close to the river and so is at risk from flooding.

It was noted that this site is a haven for wildlife and so should be protected.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site has not been allocated in the Local Plan because it is likely to have a greater landscape impact than some alternative sites. It is also located further from the town centre and educational facilities than alternative sites.

**Site 122 – Land west of Norwich Road, north of Old Station Road**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

Hopkins Homes produced a sketch showing how this site could be developed. They stated the site is well related to the existing settlement and is located 900 metres from the town centre, 600 metres from the primary school and 250 metres from the proposed community, sports and educational development on site WLP4.1. They stated safe road access could be provided onto Norwich Road with pedestrian access onto Old Station Road. The site is identified as being suitable for development in the Strategic Housing and Employment Land Availability Assessment (SHLAA). Hopkins Homes states that this site is a sustainable on sensible option and argues that it should be allocated accordingly. They added Site WLP4.2 extends into the open countryside and is situated on visible rising ground whereas the land west of Norwich Road is enclosed on three sides by urban area and on the fourth by the railway line. Land west of Norwich Road would have no landscape
impact because it is an infill development. By contrast site WLP4.2 would form an extension into a sensitive area of countryside (photos were supplied to demonstrate this). They noted the site is located on grade 3 agricultural land; whereas site WLP4.2 is located on grade 2 land. NPPF paragraph 212 states that development on agricultural land should be directed towards lower quality agricultural land, in this case land to the west of Norwich Road. They stated that Land to the west of Norwich Road is therefore a sustainable and deliverable option that should be included in the New Local Plan.

Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site is well contained in the landscape but will not be allocated on the Local Plan because alternative sites have more benign impacts, are closer to the town centre or deliver wider benefits. The preferred sites deliver adequate numbers of housing without the need to allocate site 122 as well.

Site 148 – The Sawmill, Sandy Lane, Holton

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

The site owner objected to the decision not to allocate the site for development in the Local Plan. They stated that the site is suitable for development, is immediately available, is viable and in
accordance with the National Planning Policy Framework. They stated The Sawmill site is a better option for development than site WLP4.4. This is because the Sawmill site has been used for this purpose for 200 years and has planning permission for storage. By contrast site WLP4.4 is a greenfield site located on grade 3 agricultural land. They noted the Council have claimed that as a former employment site the Sawmill could suffer from ground contamination. However this is common on brownfield sites and it is unlikely that the level of contamination would be unusual. The phase 1 contamination study attached states that while a full study is necessary to understand the situation it is likely that this requirement could be controlled through a planning condition and the site could be remediated to ensure that it is safe for residential use. They stated residential development would be preferable to allowing the site to become derelict or releasing greenfield land on the edge of the village for development. They added the Sawmill site is enclosed in the landscape in contrast to WLP4.4, which is much more open to the landscape and would require significant mitigation measures. They acknowledged that Sandy Lane is currently narrow but that the extant use of the site already generates significant amounts of traffic. Development of the site that replaces this current road access would therefore be welcome. The Sawmill site is located close to the public house and primary school, whereas site WLP4.4 is more peripherally located.

Members of the Public

No comments were made in response to this site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site will not be allocated in the local plan because alternative sites within Holton are located closer to Halesworth and so are more sustainably located. Alternative sites also have less landscape impact. The site may suffer from contamination issues and also has poor road access.

Site 159 – West of Triple Plea, Halesworth / Spexhall

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

No comments were made in response to this site.

**Members of the Public**

One member of the public states that there are more viable options for development in Brampton. Site 159 is located on a straight section of road with no houses in front or behind. The sewage works is located nearby on the corner of Redisham Road.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site will not be allocated for development in the Local Plan because of uncertainty about whether it is available for development. In addition this site is poorly connected to the existing settlement and development would be highly visible in the landscape. In addition development would harm trees and hedgerows surrounding the site, which are an important part of the landscape.

**Site 160 – Basley Ground, Bramfield Road, Halesworth**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.
Developers/Landowners

No comments were made in response to this site.

Members of the Public

One member of the public stated that smaller pockets of development on sites 115, 116, 160, 86, 14 and 106 might be preferable to site WLP4.2, which is located on high ground.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site will not be allocated for development in the Local Plan because this would lead to the loss of a playing field without any replacement. Development would be located within the flood risk zone and there are sequentially more preferable sites available within Halesworth.
Strategy for Bungay

Statutory Consultees

South Norfolk District Council supports mention of cross boundary links and recognition that Bungay acts as a local service and employment centre for Earsham and Ditchingham. The Council is pleased by the growth proposed in Bungay. (Comment pending political approval.)

Suffolk County Council notes that modelling suggests no significant congestion issues at junctions in Bungay. (Comment pending political approval.)

Suffolk County Council considers that Bungay Primary School and Bungay High School have capacity and that allocations WLP5.1 and WLP5.2 would not result in new places needed. 31 places for early education covering children aged between 2 and 5 would be required. (Comment pending political approval.)

Parish and Town Councils

Bungay Town Council notes that the average resident’s age is now 47 and the next draft of the Local Plan needs to address the issue of employment land/opportunities possibly by working with neighbouring Norfolk parishes. Bungay Town Council wants Waveney District Council to improve the town’s economy through provisions for startups, promotion of tourism, branding for the town, policies that support a varied High Street, and increased hotel provision.

Mettingham Parish Council raised concerns regarding the amount of building planned and queried whether there is a policy regarding “brownfield” sites.
Other Organisations

Bungay Honeypot Centre (Martin Evans) highlights the importance of completing the planned new Community Centre. The existing community centre site could provide approximately eight new houses and the new centre would provide improved facilities for several local groups.

Bungay Medical Centre Property Company notes they have not been previously consulted on plans to expand, there is limited existing parking, the site adjacent to the Medical Centre is proposed for a community centre, and the proposed community centre plans provide insufficient parking.

The Bungay Neighbourhood Development Plan Steering Group recommends increased services, facilities and housing for the elderly. The group asks for clarification of the development around the swimming pool and queried the need for new industrial units on this site. (Please note application DC/17/4164/ARM for Approval of Reserved Matters was submitted 29/09/2017 for 150 new dwellings and 3ha of employment land.) The group notes the lack of employment in the town and that an increased population will result in increased commuting. The group considers tourism needs more attention, the town would benefit from a hotel and there is an ideal site in the centre, startup businesses should be encouraged, development of the river systems should be encourage, and land should be made available for mobile telephone masts.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One respondent considers the proposed developments resulted in modest growth. Another respondent supports the two sites in Bungay provided necessary local infrastructure improvements are made.

One respondent considers the document a good starting point for discussion but lacks substance. Another respondent considers planners are disregarding local issues and blighting the lives of many residents, and considers the historic character of Bungay is being spoilt by developments that increase on street parking.

There are several queries regarding the proposed new community centre. These include how will new housing contribute to a new community centre, the need for a new community centre, the lack of proposed parking at the new community, and that the eight houses proposed on the site of the existing Community Centre have not been included in the Local Plan. Other queries include why Mettingham has not been allocated any houses.
Concerns and objections include –

- Increased pressures on the town’s infrastructure particularly the medical centre, schools and sewage system.
- Building on agricultural fields.
- The lack of a north/south bypass will force traffic through narrow town centre roads.
- Increased noise and air pollution resulting from increased traffic in the town centre.
- The Local Plan does not address the impact of growth in Norfolk on Bungay.
- The Local Plan does not include the new housing on the Old Ditchingham Malting sites as new homes for Bungay.
- The development will disrupt scenic views across “Tin River Valley”.
- The Local Plan does not address the existing parking issues which are causing problems or the issue of electric cars in the future.

How these comments have been taken into account in the Final Draft Local Plan

Land is allocated for employment use which will deliver employment land to help meet the need in the district identified in the Employment Land Needs Assessment and support the local economy. Branding of Bungay is something that local organisations could explore together. The tourism policy supports tourism development which could include a new hotel. The Bungay Neighbourhood Plan could explore the potential for a new hotel.

National planning policy promotes the regeneration of brownfield sites. However there are not sufficient and suitable sites in Bungay to meet the need for housing. For Waveney to accommodate the projected growth, it is inevitable that some development will have to occur on greenfield land. In terms of greenfield allocations, the strategy has sought to direct these to the least environmentally sensitive land where there is greatest potential for social and economic gains. This is evidenced in the Sustainability Appraisal Report.

The design and parking layout for the new community centre has been granted planning permission. The NHS and the Clinical Commissioning group have been consulted as part of the local plan process and have indicated that they do not require additional land to be allocated in the local plan to serve the medical centre and have no objections to the proposed level of growth for Bungay. The existing community centre site is within the settlement boundary of Bungay therefore housing is acceptable in principle, however detailed matters will need to be determined through a planning application. The ‘Built Community Services and Facilities’ policy allows redevelopment if it involves the provision of an equivalent or better replacement community facility.

Transport modelling as reported in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) has not identified significant issues with the highway network over the plan period, including air quality issues in Bungay. Planning applications
for the allocated sites will require transport assessments and travel plans which will encourage sustainable modes of travel and mitigate negative air quality and traffic impacts. The allocated site policies in Bungay are written to support pedestrian and cycle use and they will deliver improvements to pedestrian and cycle access across the area. Air quality will be considered in detail at the planning application stage.

The Strategic Housing Market Assessment (2017) identifies a need for sheltered accommodation and extra care housing in the district. The larger site allocations in this plan require delivery of this type of accommodation. The market is also expected to deliver such accommodation in response to demand. The ‘Lifetime Design’ policy requires 5% of dwellings on developments of 10 dwellings or above to comply with Requirement M4(2) of the Building Regulations which relates to accessibility/adaptability and wheelchair housing standards.

Car parking standards for new developments will need to comply with Suffolk Guidance for Parking and/or Building for Life 12. In addition, neighbourhood plans can set their own parking standards. These can minimise on-street parking. Policy WLP8.21 supports provision of facilities for charging plug-in and other ultra-low emission vehicles.

New roads such as a north/south bypass would be planned and implemented by the Highway Authority: Suffolk County Council.

Consultation with the education authority, Suffolk County Council, has revealed there is sufficient capacity in local schools for the proposed development. Land to extend the high school site by 2 hectares is included as part of the WLP5.2 site allocation.

The findings of the Water Cycle Study show that the Water Recycling Centre is capable of accommodating the proposed growth for Bungay.

**Bungay Infrastructure**

**Statutory Consultees**

No comments were made in response to this section/policy.

**Parish and Town Councils**

Bungay Town Council broadly support the infrastructure requirements outlined but recommend the following enhancements –

- The developments should include a highway layout and provision for PSVs.
- Provision of bus shelters.
- A roundabout at the St Johns Road - St Johns Hill junction.
- Traffic assessments may be required.
- Provision for electric cars.
- Provision of a long term car park for buses/coaches.

Bungay Town Council have noted –
- A policy for the area at Hillside Road – Beccles Road will be required and a recreational use may be appropriate.
- There is no rational for a new pitch at The Maltings. Maltings Meadow (the pavilion) is in South Norfolk District Council. The directors of the sports field have not been consulted and there is no space for an additional pitch.
- There are problems with the sewage network.
- The need for improved electronic communications.
- The impact of development on the High School should be considered.
- The Local Plan should recognise the medical centre serves a large area.
- Library provision should be subject to discussion with both the local and county providers.

Other Organisations
Beccles and Bungay Cycle Strategy (Ian Reid) supports improvements as identified in the Waveney Cycle Strategy.

The Bungay Neighbourhood Development Plan Steering Group are concerned that it appears there is a lack of background knowledge of Bungay’s situation such as –
- Maltings Meadow is located in South Norfolk District Council not Waveney, and there is no space for another pitch.
- Plans to expand the medical centre which has physical constraints and a lack of staff parking, whilst also erecting a new community centre on adjacent land appears contradictory.
- There appears to be no consideration of the impact of development in Bungay, Reydon and Halesworth on the Schools.
- The primary school could be relocated and community related buildings erected on the old middle school site.
- The road system needs to be carefully considered with new roundabouts.
- There is no pedestrian access to town.
- Land should be designated for a new supermarket.
- There are problems with the sewage and drainage including overflow into rivers and sometimes properties.

Developers/Landowners

No comments were made in response to this section/policy.
Members of the Public

A respondent considers there are too many vague statements and wants to know specifics such as how the medical centre will be expanded.

Members of the public have raised concerns and objections regarding-

- The need for infrastructure improvements, particularly to the drains and sewage, to be carried before the proposed developments.
- There is insufficient emphasis on the impact of developments in Ditchingham and Earsham on Bungay.
- The Malting Sport Complex is not in Waveney and there is insufficient space for an additional pitch.
- School places, shopping facilities, local employment and community creation have not been addressed.
- The cramped community centre plans with limited parking are considered unpopular with local residents. The proposed access and parking is regarded as inadequate, traffic will be a danger to children in the park, it will add to the traffic attending the doctors surgery, and erode the green space and park facilities.
- The congestion at the Lower Olland Street – St John’s Road junction needs to be addressed.

There are several queries and concerns regarding the capacity of the Medical Centre and the ability to extend it on a restricted site if the adjacent land is used for a new community centre. There is concern that the NHS historically lags behind delivering improvements to GP surgeries. There is also a query regarding how new industries will be attracted to the area.

There is support for plans to relocate the primary school and erect a new community centre on the vacant site on Hillside Road (the old middle school), and retain the existing sports facilities and land for recreation. The site at Hillside Road is regarded as an alternative and preferred site for a new community centre.

How these comments have been taken into account in the Final Draft Local Plan

Highway layouts, including junctions, will be determined via a detailed planning application and in consultation with the Highway Authority. Bus shelters can be designed in at that time if required. The Highway Authority have not identified a requirement for a roundabout on St Johns Rd. Policy WLP8.21 supports provision of facilities for charging plug-in and other ultra-low emission vehicles. Transport Assessments and travel plans are required as part of the planning application for both site allocations. Provision of employment land will create local employment opportunities and may decrease the need to commute. Coach parking will be provided as part of the High School site extension.
Transport modelling has taken place which has not identified significant issues with the highway network over the plan period, including air quality issues in Bungay. Planning applications for the allocated sites will require transport assessments and travel plans which will encourage sustainable modes of travel and mitigate negative air quality and traffic impacts. The site allocation policies in Bungay have been written to support walking and cycling and will deliver improvements to access across the area. Air quality will be considered in detail at the planning application stage.

The findings of the Water Cycle Study show that the Water Recycling Centre is capable of accommodating the proposed growth for Bungay. Policy WLP8.24 Flood Risk requires use of sustainable drainage systems and opposes surface water connections to sewers.

The Local Planning Authority is holding discussions with the Clinical Commissioning Group and NHS England to understand their requirements for the medical centre and these will be incorporated into the Local Plan accordingly.

Suffolk County Council as the education authority has identified the Primary School and High School in Bungay have sufficient capacity. The allocated site to the rear of the high school includes a pre-school.

With respect to development in Ditchingham and Earsham, the Local Planning Authority has a duty to co-operate with neighbouring authorities including South Norfolk District Council and the Broads Authority. The Local Planning Authority has considered the impact on infrastructure in Bungay and is working with infrastructure providers to plan for existing and future local needs.

The design and parking layout for the new community centre has already been granted planning permission.

The allocated sites are not considered to be of sufficient size to support a shop. Any proposals for a shop would be assessed on their merits.

The Playing Pitch and Outdoor Sports Facilities Assessment (2014) identifies a deficiency of 3G pitches in Bungay and promotes a small 3G pitch at the Maltings Pavilion site.

Any changes to the Primary School and former Middle School sites are likely to come forward prior to the Local Plan and therefore have not been addressed as part of Local Plan.
Policy WLP5.1 - Land East of St Johns Road, Bungay

Statutory Consultees

The Environmental Agency recommends any planning application should include a flood risk assessment to demonstrate the development is safe and does not increase flooding elsewhere.

Suffolk County Council notes access should be from the A144 St Johns Road utilising the right turn lane. New off-site rights of way should be sought to provide recreational opportunities. (Comment pending political approval.)

Suffolk Wildlife Trust notes the site was subject to a wildlife audit in 2017 that recommended further surveys may be required if the boundary features are impacted by development, and that suitable buffers for the boundary should be included. The Trust notes these recommendations do not appear to have been included in the Draft Local Plan.

Parish and Town Councils

Bungay Town Council considers the site should not be allocated for development due to the water drainage issues and instead recommends site 209.

Other Organisations

Beccles and Bungay Cycle Strategy recommend the proposed path along the northwest of the site connects Kings Road and the swimming pool.

Bungay Neighbourhood Development Plan Steering Group considers the site should not be allocated for development due to water drainage difficulties and appropriate land should be made available for green space in Bungay.

Developers/Landowners

The owner does not consider the water course or approved attenuation pond should affect the size or shape of the allocation, and the allocation boundary should revert to the site as submitted. The additional land would allow for a more comprehensive drainage and attenuation solution, and open space and landscaping. The number of houses proposed should be a minimum figure and the proposed density a guide. Evidence should be provided for the 5m landscaping strip. The requirement to protect views of Dukes Farm and Barn is unnecessary and contradicts the
requirement for landscaping. Pedestrian and cycle routes should only be required on land within the control of the landowner. There should be no reference to archaeology in the policy.

Members of the Public

Objections and concerns regarding the site include –

- It is commonly known that “Tin River” overflows and floods the field when it rains continuously.
- “Tin River” has burst its banks on three occasions in the last thirty years flooding the rear gardens of properties on Mayfair Road, and the development may increase the flood risk.
- Housing on the site would make the playground on Meadow Road unsafe.
- There are problems with the sewage system and it couldn’t cope with addition houses.
- The town does not have the infrastructure to support the development. The Doctors Surgery and schools area under strain. The Council Officers and Police Station have been lost.
- It is unlikely people living in development would work in Bungay resulting in increased traffic through the town.
- A public footpath and cycleway along the northwest boundary adjacent to the rear gardens of dwellings will result in noise and pose a security risk, and the footpath should use the roads in the development.
- The proposed landscaping on the southeast boundary would benefit a single family at the farm, with no landscaping proposed on the northwest boundary where there are several properties and families.
- The development would disrupt scenic views.
- St John’s Road would need to become a dual carriageway to the support the developments.
- The development would de-value neighbouring properties.
- The development is too large.

One respondent requested that the site was not accessed via Mayfair Road due to the road being narrow, having a bend, and there is on-street parking. Another respondent recommends a roundabout as a traffic calming measure on St John’s Road, at the access to the WLP5.1 and WLP5.2.

One respondent was not aware of any problems with rain water, except those caused by rubbish in the Tin River.

There is a query regarding whether residents affected by construction and loss of views would be compensated.

Recommendations include moving the houses allocated to site WLP5.1 to sites WLP5.2 and 209 to avoid flooding and drainage issues, the site is developed with bungalows, the creation of a wildlife and fauna buffer between the existing and proposed developments, and a bypass and traffic calming measures are provided.
How these comments have been taken into account in the Final Draft Local Plan

A masterplan has been designed and flood risk in the area has been a factor in its design. Built development remains outside of the flood risk area and in addition the policy requires submission of a flood risk assessment demonstrating that the development is safe and will not increase flood risk outside of the developed part of the site. Furthermore the Flood Risk policy requires development to make use of Sustainable Drainage Systems to deal with surface water drainage.

A masterplan has been developed which includes pedestrian and cycle routes in to and out of the site, providing formal links across this part of Bungay. These links do not need to be positioned immediately on the boundary.

The masterplan indicates areas at the northwest and southeast edges of the site where buildings should be no higher than 1.5 stories. This will reduce the visual impact of buildings to neighbouring properties and when viewed in the landscape to the east and south.

The policy requires an ecological assessment undertaken by a suitably qualified person as part of any planning application. The hedgerow by the Tin River is required to be retained. Landscaping is included on the southern edge of the site which will provide biodiversity connectivity to and from the Tin River.

This allocation is well served by a nearby play area and links will be provided. Additionally, the land by the Tin River should be retained as floodwater-compatible open space.

The site area has been returned to the size as originally submitted. This outline of the site allows the provision of pedestrian and cycle routes to connect to adjoining land. The masterplan specifies where built development should take place and which part should remain undeveloped and support drainage. The number of houses is based on a density of 30 dwellings per hectare, which is the desired density for the Market Towns in the district as set out in the policy ‘Housing Density and Design’. This development will provide a new urban edge to the built-up area of Bungay. Substantial landscaping is required to soften the visual impact of the development in order to prevent an exposed edge in the rural landscape and provide a buffer from the listed buildings to the south. A 5 metre landscaped strip will allow for planting to establish itself. This landscaping can be designed so that views of the listed Dukes Farm and Barn are not harmed. The site has potential for archaeology and therefore archaeological evaluation will be required with any planning application to assess the impact of the development.

The findings of the Water Cycle Study show that the Water Recycling Centre is capable of accommodating the proposed growth for Bungay. Policy WLP8.24 Flood Risk requires use of sustainable drainage systems and opposes surface water connections to sewers.
The Local Planning Authority is holding discussions with the Clinical Commissioning Group and NHS England to understand their requirements for the medical centre and these will be incorporated into the Local Plan accordingly.

Transport modelling reported in Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) has not identified significant issues with the highway network over the plan period. Additionally, employment land is being allocated on the land immediately to the southwest of this site which will provide employment opportunities and reduce the need to commute. The Highway Authority raise no objections to the access and have not identified a requirement for a roundabout or dual carriageway.

**Policy WLP5.2 - Land Rear of Bungay High School**

**Statutory Consultees**

Suffolk County Council has noted the site will require an upfront archaeological assessment and reference should be made in the supporting text and policy. (Comment pending political approval.)

Suffolk County Council advise a through route and link should be provided to the adjacent site. (Comment pending political approval.)

Suffolk Wildlife Trust notes there has been no wildlife audit so the ecological value of the site is not established. It is therefore not possible to confirm the site is appropriate for development. Further assessment is recommended prior to allocation.

Sport England supports the policy in principle as it will secure an extension to the playing fields.

**Parish and Town Councils**

The Bungay Town Council support the allocation.

**Other Organisations**

Beccles and Bungay Cycle Strategy recommend the proposed east-west cycle route connects with St Margaret’s Road as part of the development rather than as a “future connection”.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One respondent recommends a roundabout as a traffic calming measure on St John’s Road, at the access to the WLP5.1 and WLP5.2.

Support received for the development. Various recommendations include that all development is on land to the west side of the A144 on sites WLP5.2 and 209, that only WPL5.2 is developed, that the sewage system is improved prior to development, a bypass and traffic calming measures are provided, and trees and screening are used to protect neighbouring residents from noise and disruption.

Objections and concerns regarding the site include –
- There is too much development proposed Bungay.
- The developments will result in increased emissions and car traffic.
- The pavement to the site is inadequate.
- The schools and GP facilities would not be able to cope.

How these comments have been taken into account in the Final Draft Local Plan

The site has archaeological potential and the policy has been amended to include the requirement for an archaeological evaluation to accompany any planning application.

The policy has been amended to specify that pedestrian and cycle routes shall provide connectivity within and across the site. The connection to St Margaret’s Road falls outside the allocated site but allowance is provided to make connections in the future.

Highway layouts, including junctions and traffic calming measures, will be determined via a detailed planning application and in consultation with the Highway Authority.

Suffolk County Council as the education authority has identified the Primary School and High School in Bungay have sufficient capacity. Additionally this site includes a new pre-school.

The Local Planning Authority is holding discussions with the Clinical Commissioning Group and NHS England to understand their requirements for the medical centre and these will be incorporated into the Local Plan accordingly.
Transport modelling has taken place which has not identified significant issues with the highway network over the plan period.

Visual impact on neighbouring properties will be assessed via a detailed planning application.

The policy has been amended to require an ecological assessment with any planning application.

Alternative Sites

039 Land at Grove Farm, Mettingham

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One respondent supports the site and does not consider development would visually impact the Broads as the site is located behind existing houses.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is in a sensitive landscape which makes a major contribution to the setting of the Broads.

The site has not been taken forward in the Local Plan.
209 Land South of Moutbatten Road, Bungay

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Bungay Parish Council supports site in preference to site WLP5.1.

Other Organisations

The Bungay Neighbourhood Development Plan Steering Group support the site, believe it should be reconsidered, and that it could accommodate a supermarket.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

Members of the public support the site in preference to site WLP5.1.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. This site is considered to be less favourable than the allocated sites which deliver more than sufficient housing for Bungay.
Southwold and Reydon

Strategy for Southwold and Reydon

Statutory Consultees

Suffolk County Council states that Reydon Primary School only has limited capacity to accommodate the extra primary school places generated by allocation WLP6.1. It is unlikely that the school would support any extension or relocation and so it is likely that remaining pupil places will need to be accommodated in Southwold, Wenhaston, Bramfield or Brampton. It is therefore possible that parents will not be able to send their children to their catchment primary school.

Parish and Town Councils

Reydon Parish Council notes that the development allocated to Southwold and Reydon is 4% of the total and represents a significant increase on the existing housing stock in Reydon, where the development is to be located. While it is accepted that housing development is needed to maintain the vitality and viability of market towns this has not been the effect in Southwold or Reydon, where 50% of new homes have become second homes or holiday lets. The ratio between local pay and property prices means that workers cannot afford to access market housing. More affordable housing is needed in all developments and the 35% affordable housing requirements should be seen as a minimum. All categories of affordable housing should be protected in the medium to long term and priority given to those with a local connection. They noted that The Draft Local Plan states that the housing target of 325 dwellings will be offset by dwellings granted planning permission since
2014. They noted number of offset houses referred to in the Draft Local Plan makes no reference to the developments at Pitches View (six shared ownership bungalows for older people), Green Lane (23 affordable homes), Southwold Hospital (4-6 units) and the Police and fire stations (20 units). They added that plans for a nursing home on land adjacent to Sole Bay Health Centre will deliver 20 dwellings because residents will live there on a permanent basis and the planning permission at St. Felix School will create another 69 dwellings. This will reduce the residual target to 175 dwellings, or 106 if the scheme at St. Felix School is approved. They noted this should be the absolute maximum number of dwellings to be delivered over and above that planned for over the plan period. This is unless it can be demonstrated in the later years of the plan that there is a need for more affordable housing on the edge of Reydon. The Parish Council’s acceptance of the housing figures is strictly on the condition that they will include a minimum of 35% of affordable housing and that some of the market housing will be affordable for local people.

Other Organisations

The Southwold and Reydon Society is concerned that there is no objective justification for the number of homes needed in Southwold and Reydon during the plan period. A detailed case is needed based on assessed housing need. There should also be measured to prevent new homes being used as second homes or holiday lets. The proposed 325 new homes are larger than previously proposed options for growth, particularly in relation to the existing housing stock. This is particularly the case in Reydon, where the vast majority of developable land is located. The Society acknowledges that previous rounds of consultation have favoured a greater proportion of new development in market towns and villages and agrees that new housing development is necessary to ensure the viability of these places. However in Southwold and Reydon 50% of new homes become second homes or holiday homes. They noted that The Draft Local Plan states that the housing target of 325 dwellings will be offset by dwellings granted planning permission since 2014. They noted number of offset houses referred to in the Draft Local Plan makes no reference to the developments at Pitches View (six shared ownership bungalows for older people), Green Lane (23 affordable homes), Southwold Hospital (4-6 units) and the Police and fire stations (20 units). They added that plans for a nursing home on land adjacent to Sole Bay Health Centre will deliver 20 dwellings because residents will live there on a permanent basis and the planning permission at St. Felix School will create another 69 dwellings. This will reduce the residual target to 175 dwellings, or 106 if the scheme at St. Felix School is approved. They noted this should be the absolute maximum number of dwellings to be delivered over and above that planned for over the plan period. They added if further housing need is identified later in the plan period this should be provided on smaller peripheral sites on the edge of Reydon under policy WLP8.6, which should be extended to include Reydon for this purpose.

Developers/Landowners
NRL agreed with the conclusions of the strategy on page 24. However, they considered the approach of focusing 55% of growth in Lowestoft and only 4% in Southwold is unbalanced. This is accentuated by Southwold’s historic centre, which presents only a limited number of opportunities for new development. They noted that high house prices mean that more people work in Southwold than actually live there. Opportunities for housing development in Southwold are extremely rare and so it is logical to plan more housing growth in Reydon, for example on sites 5 and 38.

Hopkins Homes stated that it is necessary to increase the level of housing development in Southwold to increase affordability and to reduce the need for workers in Southwold to commute in from other areas.

Members of the Public

It was suggested that the site next to the Sole Bay Health Centre should be considered for housing. It was suggested that NHS Property Services intend to develop the site for housing, possibly with a retail element. It was noted that the site is centrally located and is close to a health centre, pharmacy, a dental surgery and a public house.

It was argued that there was no justification for the 325 homes target. It was argued there is no supporting evidence for the claim that there is a lack of affordable homes or significant in-commuting. Reference was made to the Strategic Housing Market Assessment to support claims. As such it was considered inappropriate to base housing numbers of this argument. It was suggested that homes will likely be occupied by those working outside the area, retirees and second home owners which cannot be considered sustainable development. It was added there was no justification for the 4% housing target and it was suspected that the target is driven by the capacity of the Copperwheat Avenue site. It was suggested that existing commitments mean that a smaller proportion of site allocation WLP6.1 needs to be developed. This would result in less impact on the AONB and less pressure on the sewage system and road network.

It was suggested that more dwellings could be built in the future if there is an identified need. It was suggested that housing need is for one, two and three bedroom dwellings but most homes are sold for second homes or holiday lets.

It was suggested that the planning permission for 69 dwellings at St. Felix School has made the plan making process redundant and will increase public cynicism towards the planning system. It was suggested that other landowners will be surprised that the St. Felix School site, which was one of the sites put forward for allocation in the Local Plan, has been able to jump the gun.

Concern was raised that the plan contains no measures to control second home ownership.
Concern was raised that too many houses will destroy Southwold as a tourist destination and increase pressure on parking facilities.

It was suggested that no housing allocations should be made in Reydon, which is located in the AONB. It was suggested that brownfield sites in Southwold have the potential to deliver a significant amount of new housing.

It was suggested that affordable housing is not needed because it tends to be purchased by troublesome residents.

It was questioned how Southwold Town Council’s strategy fit in with the Local Plan.

It was questioned whether it was legitimate to maintain St. Felix School as a business when its buildings would be good for conversion to affordable housing.

It was questioned whether it can be guaranteed that new houses will be reserved for affordable housing.

**How these comments have been taken into account in the Final Draft Local Plan**

The number of houses on allocation WLP6.1 has been reduced from 250 to 220 to take account of capacity issues at local primary schools.

The housing proposal at St. Felix School was submitted as a planning application, which is a separate process to the Local Plan making process, and as a result this site was considered prior to the finalisation of the Local Plan.

The site next to the Sole Bay Health Centre will not be allocated because there is no available information about whether the site is available for residential development. However it is possible that the site next to the Sole Bay Health Centre could be progressed as a planning application independent of the plan making process.

Development on site WLP6.1 will include the provision of affordable housing in accordance with Policy WLP8.2 which for Southwold and Reydon requires a higher level of 40%. The Local Plan will not include measures to prevent the sale of second homes or holiday lets but this issue could be addressed through the neighbourhood planning process.

**Infrastructure**

**Statutory Consultees**

There were no responses to this section.
Parish and Town Councils

There were no responses to this section.

Other Organisations

Beccles and Bungay Cycle Strategy organisation welcomes the inclusion of improvements to the cycle network as identified in the Waveney Cycle Strategy.

Suffolk Coasts and Heaths states that measures to improve cycle and pedestrian routes could be incorporated into infrastructure sections of the Local Plan. A more strategic approach to Green Infrastructure is needed, which incorporates new development with open spaces and countryside. Green infrastructure should incorporate landscape and wildlife enhancement into its design. There is a much wider remit to green infrastructure than just the two recreation type facilities identified in paragraph 6.5.

Developers/Landowners

There were no responses to this section.

Members of the Public

It was suggested that infrastructure improvements such as cricket pitches and sports fields provide minimum benefits to local people.

It was suggested that better roads, reliable bus services, swifter access to local doctors and reasonably priced shopping facilities should be included.

It was noted that Southwold Cricket Club is currently considering relocating to Reydon.

It was noted that the lease on the Southwold Tennis Club site at Hotson Road is due to end shortly and Waveney District Council have told the club that they will find them a new site because they want to develop Hotson Road. Yet there is no allocation for housing development on Hotson Road in the Local Plan.

There are concerns about the provision of parking as well as for access for cyclists and pedestrians, including school children and dog walkers.

It was suggested that too many properties are proposed - 200 homes means 600 cars plus tradesmen.
It was stated that school places and shops need to be provided to support new families.

**How these comments have been taken into account in the Final Draft Local Plan**

The Green Infrastructure Strategy underpins policies within the Local Plan and provides guidance about the future provision of all types of green infrastructure throughout the District.

Policy WLP6.1 will retain existing trees and vegetation around the edge of the site as well as public rights of way to the south and west. This will help to include linkages with surrounding networks of trees and hedgerows and will promote access to the local countryside. In addition the Council will ensure that development on this site includes new children’s play space.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site. Transport modelling in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) does not identify any congestion issues in Reydon.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

**Policy WLP6.1 Land to the West of Copperwheat Avenue**

**Statutory Consultees**

Suffolk County Council notes that this site was not included in the Issues and Options Consultation. Planning applications must be supported by upfront archaeological investigation and for consistency this requirement should be made in the supporting text using the Council’s wording for this clause. This is a large area that has not been systematically investigated.

Suffolk County Council States that improvements to The Crescents and the Wangford Road pedestrian crossing are required. A transport assessment is also required.

The Environment Agency welcomes the policy to safeguard and enhance the Area of Outstanding Natural Beauty. Proposed tree and hedge planting should include native species.

**Parish and Town Councils**

Reydon Parish Council accepts WLP6.1 as a development allocation. The existing settlement has been planned for westward expansion and the roads have been designed to allow for this. It is accepted that this is not a sensitive site and would create a coherent boundary with the existing settlement. However, they noted development would form a significant incursion into the AONB –
the second after the planning permission at St. Felix School. They added that the site will require considerably fewer than the 250 houses mentioned and therefore an allocation with reduced land area or development density should be considered. This would allow for an increased emphasis on policy, landscaping and gardens. They stated that WLP6.1 should include guidance about design and there is the potential to include elements of Suffolk vernacular and more modern equivalents that reflect the surrounding countryside. They stated that expansion of Reydon should not appear as suburban sprawl or pastiche designer homes. They raised two issues that are a cause of considerable concern:

- Pressure on the sewer network, which is already under considerable strain. There are issues of air pollution and foul water discharge into local dykes. They stated that the Policy should make specific provision for improvements to the sewage infrastructure and the capacity of the treatment works so that these become a required condition of any future planning permission.
- Traffic access should include two points of entrance and exit and any necessary modifications to junctions with the Wangford Road. There are similar concerns with regard to St. Felix School and entrance onto Halesworth Road.

Other Organisations

The Southwold and Reydon Society’s comments were set in the context of its questioning of the need for 250 new dwellings. The Society accepted the case for allocation of the site because the landscape is not particularly sensitive and the road network was obviously built with westward expansion in mind. They drew attention to the Settlement Fringe Landscape Sensitivity Study, which states that this area only has the landscape capacity to accommodate small scale development of ten dwellings or less. They argued that considerably fewer dwellings are needed than the 250 specified in the policy and this means that a smaller land area could be given over to development or the site could be developed at a lower density. This would provide greater opportunity for landscaping, open space or gardens. They noted that site 202, which forms the southern part of this allocation, could accommodate 112 new dwellings, which is in accordance with the requirement identified by the Society. They stated that guidance about design is needed, which includes some elements of the Suffolk vernacular or a modern equivalent, as well as encouraging low carbon impact design. They added that development on this site should make explicit reference to sewage network and treatment improvement works. Traffic should establish at least two points of access / egress and make any modifications to junctions with the Wangford Road.

Suffolk Coasts and Heaths stated that paragraph 6.7 is incorrect in that Reydon is not surrounded by the AONB but rather is located inside of the AONB. They added that allocation of this site is likely to include major development that is contrary to NPPF paragraph 115 and would need to satisfy paragraph 116, which is likely to be problematic. In addition, they stated that a Landscape and Visual Impact Assessment would be required and this should inform measures to mitigate any adverse
impacts associated with development and offer measures to enhance the landscape. They added that development should aim to conserve and enhance the local landscape and should protect and enhance public rights of way and provide linkages with the local footpath network. They stated that there should be detailed guidance about the provision of affordable housing and guidance about design, building quality and sustainable building principles. Open space requirements may need to take into account necessary mitigation regarding disturbance on nearby European Sites. They noted that the amount of open space provided may need to be revised following the HRA assessment.

Suffolk Wildlife Trust cautioned that this site has not been the subject of a wildlife audit and without knowledge of its ecological value it is not possible to know whether it is suitable for development. They added that site allocations should be supported by ecological assessment and development should avoid or mitigate ecological impacts and provide ecological enhancements.

Developers/Landowners

The landowner states that the sewage network lacks capacity and that this is an issue that has become worse over the last 30 years. The pumping station at the bottom of 3 Marsh Lane requires closer examination. Design quality in local developments has deteriorated over the last 15 years. Garages are often used for storage space because of a lack of storage capacity within houses and cars are parked in the road. In addition garages are often too small to accommodate a car. Affordable homes should be included with sensitivity and imagination and not just dropped in.

NRL stated there is an unjustified bias in the analysis of sites WLP6.1, 5 and 38. For example the Council’s analysis underplays the fact that both preferred and rejected sites are located in the AONB. NRL disputes the claim that the preferred site does not form a significant incursion into the countryside and has come to a more balanced conclusion that there is little difference between the preferred and rejected sites in this regard. In short the assertion that the preferred site will have less landscape impact and other sites is not supported by the evidence. They added there has not been any assessment of the impact of the proposed site upon nearby listed buildings. They suggested that WLP6.1 is likely to have a greater impact upon views of the church compared to site 5 and 38 because it is more visible in the countryside. They stated that the Council’s conclusion in its HRA screening assessment that there is no likely significant effect from the proposed housing allocation cannot be supported in fact and is inconsistent with HRAs undertaken elsewhere in Suffolk. In landscape terms they suggested it is necessary to reduce the size of site WLP6.1 by 50% and to bisect the site so that its western flank follows the existing development boundary from north to south. They added that the preferred site should be assessed for its impact on Gorse Lodge, just as thoroughly as sites 5 and 38 have been assessed for their impact on St. Margaret’s Church.
Members of the Public

There is concern that allocation WLP6.1 and the two sites it is made up of (sites 189 and 202) were not included in the original consultation and so it is surprising that site WLP6.1 is now the preferred option in the Draft Local Plan.

Residents were concerned that development on this scale will form a major encroachment into the AONB and will harm local wildlife and habitats.

Concern was raised that no account has been taken of National Planning Policy Framework NPPG paragraph 116 or the Council’s own evidence base. It was noted that the Settlement Fringe Landscape Sensitivity Study identifies this landscape as only being able to accommodate developments of ten dwellings or less. It was stated that Paragraph 6.7 of the Local Plan is incorrect in its assertion that new development will not encroach into the open countryside, as the map on page 115 shows.

It was suggested that this was not infill development and is an important part of the corridor of land that links Wangford Road to Halesworth Road.

Concern was raised that development will lead to the loss of the footpath between Keen’s Lane and Reydon Church, described as ‘...one of the prettiest footpaths in the locality.’ This leads to a glade of trees and a pond, which could be lost to development.

It was noted there is a large site located adjacent to the A12 between the B1387 and Hazels Lane, which has been on sale for years. It was suggested that developing this site would create a new conurbation, as has been accomplished just off the A12 at Saxmundham.

There is concern that further development of the scale proposed will place a considerable burden upon local schools and healthcare providers.

It was suggested that the sewerage system is already at capacity and it is likely that it will not be able to cope with the proposed development.

It was suggested that residential development raises issues of road safety because of the increase in the number of vehicles. In addition this site is remote from Southwold Town Centre, which means that residents will drive rather than cycle or walk to the town centre which will increase pressure on parking.

It was stated that action is needed to control the number of second homes in this development and the wider Southwold area.
It was suggested that future development should only be permitted if there is an increase in the number of jobs for local people.

**How these comments have been taken into account in the Final Draft Local Plan**

The number of houses on this site will be reduced from 250 to 220 so that it does not exceed the capacity of local schools.

The policy will be amended to include a condition requiring archaeological investigation as part of any planning application.

The allocation will be subject to an ecological assessment as part of any planning application.

The supporting text and policy will be amended to reflect the need for improvements to the Crescents and the need for a pedestrian crossing over Wangford Road.

Site WLP6.1 is well contained in the landscape, being surrounded by existing development to the north, south and east. It is also bordered by and existing hedgerow to the west, which further reduces its landscape impact. Alternative sites are more exposed in the landscape because they are only bordered by existing development on one side and are more visible from roads to and from Southwold. In addition the western edge of site WLP6.1 follows the line of an existing hedgerow, which helps to contain it in the landscape.

The site will be designed so as to minimise landscape impact, preserve trees and hedges and to retain existing footpaths. This will also help to help to promote linkages between the new housing and the countryside. This will be delivered through the use of appropriate design and landscaping.

The Local Plan already identifies that improvements to the sewerage network will be needed in Southwold and Reydon. The Waveney Water Cycle Study (2016) identifies that there is sufficient capacity in the wastewater recycling centre.

The Local Plan will not seek to reduce levels of second home and holiday home ownership but this issue could be tackled through the neighbourhood planning process.

**Policy WLP6.2 Southwold Harbour**

**Statutory Consultees**

The Environment Agency supports the policy position, which is that development should not affect the structural integrity of flood defences and may require a permit under the Environmental Permitting Regulations 2010. Permits are required if work is undertaken within eight metres of a fluvial main river of flood defence and 16 metres of tidal waters and associated flood defences.
Suffolk County Council will require consultation if development does come forward on this site and that consideration is given to using mineral content on the site in future development to reduce the amount of material that is transported to and from the site.

Suffolk County Council states that this policy allocation is unlikely to have any impact upon the public highway.

**Parish and Town Councils**

Reydon Parish Council states that this policy is inadequate because it only deals with the harbour itself. The strategy must be extended to provide a strategic framework for the whole Blyth Estuary. The strategy should be based on the work of the Blyth Estuary Group and should seek to maintain the estuary in its current shape. Policies should include the following measures that will deal with tidal surges:

- Further raising estuary walls.
- Measures taken by residents and businesses to make their properties more resilient.
- Design of pontoons and jetties to withstand flood events.

**Other Organisations**

Southwold and Reydon Society states that this policy is inadequate and should be set in the context of a strategy for the whole Blyth estuary. This must preserve the current shape of the estuary and prepare for tidal surge incidents. The strategy must take an integrated approach and include flood tides and allow residents and businesses to make their properties flood resilient. It must also allow the appropriate development of pontoons and jetties.

Suffolk Coasts and Heaths states that the policy concerning the replacement of huts and other structures on either side of Southwold Harbour should be extended to include all development proposals such as change of use of fishing huts, installation of lighting, on water activity, etc. They do not agree that the poor condition of the access contributes to the character of the harbour and that appropriate management of the access route could enhance the harbour. They stated that further investigation is needed regarding current usage and the way private access rights by vehicle are exercised. The status of restricted byway does not allow for a public right of vehicular access. It is necessary to ensure access for local businesses but ensuring that public through traffic is not permitted.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public responded supports the general approach to developing the harbour but stated that the policy was inadequate. The policy must be set within the context of a strategy for the whole Blyth Estuary. It should preserve the current shape of the estuary and to prepare for tidal surge events by taking an integrated approach to deal with flood tides. This includes allowing residents and businesses to make their properties flood resilient and to allow the appropriate development of jetties and pontoons.

How these comments have been taken into account in the Final Draft Local Plan

The Southwold Harbour policy is intended to provide guidance about development of the harbour itself, rather than to provide an overarching strategy for the entire Blyth estuary. However the Council recognises that the harbour is an important part of the estuary and has cooperated fully with other organisations involved in the management of the Blyth estuary when preparing the Local Plan. Furthermore the Council will continue to work with other organisations in the future on all issues concerning the Blyth estuary, including flood resilience. Policy WLP8.25 (Coastal Change Management Area) of the Local Plan does allow for the improvement and strengthening of coastal defences in accordance with the Shoreline Management Plan.

The supporting text provides a description of the harbour, including Blackshore Road. It is not intended to prevent repairs to or improvements to the condition of the road. The policy itself is strongly focused on the protection and replacement of the fishermen’s huts and pontoons. Southwold Harbour is located within a conservation area and so guidance about other types of development can be found within policy 8.37. The Local Plan also provides guidance about the change of use of buildings. Guidance about water based uses can be found within the East Inshore Marine Plan (2014).

Alternative Sites

Site 5 – Brambles Drift, Green Lane, Reydon
Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

NRL have commissioned analysis of heritage, ecology and landscape impact and draw the Council’s attention to their conclusions, which seem to be at odds with their analysis of sites 5 and 38. Dialogue is sought with the Council to narrow differences with NRL and to establish a path forwards. They stated that there is an unjustified bias in the analysis of sites WLP6.1, 5 and 38, for example the Council’s analysis underplays the fact that both preferred and rejected sites are located in the AONB. NRL disputes the claim that the preferred site does not form a significant incursion into the countryside and has come to a more balanced conclusion that there is little difference between the preferred and rejected sites in this regard. They noted the assertion that the preferred site will have less landscape impact and other sites is not supported by the evidence. They noted that work undertaken to date indicates limited archaeological potential and no impact upon views of St. Margaret’s Church. They stated that a preliminary ecological assessment has indicated that development of sites 5 and 38 presents the opportunity to include enhancements to local biodiversity and landscape and with respect to the HRA assessment there is no reason why sites 5 and 38 should not be included in the Council’s housing allocation. They stated that their landscape impact report included within their representation demonstrates that the Council’s assessment of sites 5 and 38 has been disproved. They stated that Sites 5 and 38 are located just as close to local shops and services as the preferred site. The opportunity to replace houses lost to coastal erosion applies to any site, including sites 5 and 38, and not just the preferred site. Play space and other infrastructure requirements for the preferred site can also be provided on sites 5 and 38.

Members of the Public

Two members of the public responded. One opposed to development on sites north of Green Lane on grounds that it would extend the village north of the boundary with negative landscape impacts. In particular site 5 would have a severe impact on the landscape and local infrastructure because of its location on the corner of Wangford Road and Green Lane.
The other response stated that it would be a more ‘village friendly’ approach to meet housing targets by developing a number of smaller sites. Small scale development on sites 5, 26 and 38 was considered preferable. Reydon should expand along Green Lane because historically the village developed close to the church and church hall.

**How these comments have been taken into account in the Final Draft Local Plan**

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The impact upon the surrounding landscape is considered greater than that of the preferred site. Policy for the allocated site will include measures to ensure that future development protects and records archaeological content on the site as well as biodiversity and wildlife habitats.

**Site 26 – Jubilee, Green Lane, Reydon**

**Statutory Consultees**

No comments were made in response to this site.

**Parish and Town Councils**

No comments were made in response to this site.

**Other Organisations**

No comments were made in response to this site.

**Developers/Landowners**

No comments were made in response to this site.

**Members of the Public**

One response opposes to development on the grounds that it would extend the village northwards with a negative impact on land to the north of the boundary.

Another response stated that it would be a more ‘village friendly’ approach to meet housing targets by developing a number of smaller sites. Small scale development on sites 5, 26 and 38 was considered preferable. Reydon should expand along Green Lane because historically the village developed close to the church and church hall.
A third response describes this site as thoroughly unsuitable and states that its address has been entered incorrectly: it should be entered as Rissmere Lane East. Road entrance would be via Rissmere Lane, which currently is used by horse riders, dog walkers and cyclists that currently use this road as a designated lane. Development would form an encroachment into the AONB and would lead to the loss of several established trees.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. This site will not be allocated in the Local Plan because it would impact upon the surrounding landscape and result in the loss of tourist accommodation.

Site 38 – Land at Green Lane, Reydon

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

NRL have commissioned analysis of heritage, ecology and landscape impact and draw the Council’s attention to their conclusions, which seem to be at odds with their analysis of sites 5 and 38. Dialogue is sought with the Council to narrow differences with NRL and to establish a path forwards. They stated that there is an unjustified bias in the analysis of sites WLP6.1, 5 and 38, for example the Council’s analysis underplays the fact that both preferred and rejected sites are located in the AONB. NRL disputes the claim that the preferred site does not form a significant incursion into the countryside and has come to a more balanced conclusion that there is little difference between the preferred and rejected sites in this regard. They noted the assertion that the preferred site will have less landscape impact and other sites is not supported by the evidence. They noted that work undertaken to date indicates limited archaeological potential and no impact upon views of St. Margaret’s Church. They noted that a preliminary ecological assessment has indicated that development of sites 5 and 38 presents the opportunity to include enhancements to local
biodiversity and landscape and with respect to the HRA assessment there is no reason why sites 5 and 38 should not be included in the Council’s housing allocation. They stated that their landscape impact report included within their representation demonstrates that the Council’s assessment of sites 5 and 38 has been disproved. They stated that Sites 5 and 38 are located just as close to local shops and services as the preferred site. The opportunity to replace houses lost to coastal erosion applies to any site, including sites 5 and 38, and not just the preferred site. Play space and other infrastructure requirements for the preferred site can also be provided on sites 5 and 38.

Members of the Public

One respondent is opposed to development on this site because it would extend the village to the north, which would create a negative impact.

Another response states that it would be a more ‘village friendly’ approach to meet housing targets by developing a number of smaller sites. Small scale development on sites 5, 26 and 38 was considered preferable. Reydon should expand along Green Lane because historically the village developed close to the church and church hall.

The third response states that development on this site would encroach into the AONB. There are two large parcels of land to either side of the A1095 just to the south of Might’s Bridges that would be preferable locations for development.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

The sites impact upon the surrounding landscape is considered greater than that of the preferred site. Policy for the allocated site will include measures to ensure that future development protects and records archaeological content on the site as well as biodiversity and wildlife habitats.

Site 117 – Land to the West of Laurel Farm, Reydon

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

Hopkins Homes considered that the Draft Local Plan has failed to allocate enough housing land in Southwold and Reydon and that their site, which is represented as sites 117 and 118, has been erroneously overlooked. The SHELAA identifies both of these sites as being available and achievable. Yet they are both discounted due to impact on the AONB and grade II listed Gorse Lodge. They argued that in the context of the above, the two Hopkins Homes sites must be identified as the most sustainable development option. The site is a similar distance from Gorse Lodge and development could be designed so as to respect the listed building. While the site does extend slightly further to the west it is bounded to the south by the road and by St. Felix School. Therefore the site would not extend the western edge of Reydon any further into the countryside than it already is. They added that Hopkins Homes understand the local context and consider the site to be in a sustainable location that could deliver housing that is needed in the town. They indicated that a review by civil engineers has confirmed that safe road access could be provided for up to 100 dwellings.

Members of the Public

Three members of the public responded to the consultation on this site. Two respondents objected to development on this site because it would encroach into the AONB. Another respondent notes that this site is surrounded by the A1095 road and a listed building.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Development would have a significant adverse impact upon the landscape, which would be greater than the impact from developing on the preferred site.

Site 118 – Land to the west of Laurel Farm, Reydon

Statutory Consultees

No comments were made in response to this site.

Parish and Town Councils

No comments were made in response to this site.
Other Organisations

No comments were made in response to this site.

Developers/Landowners

Hopkins Homes considers that the Draft Local Plan has failed to allocate enough housing land in Southwold and Reydon and that their site, which is represented as sites 117 and 118, has been erroneously overlooked. The SHELAA identifies both of these sites as being available and achievable. Yet they are both discounted due to impact on the AONB and grade II listed Gorse Lodge. They argued that in the context of the above, the two Hopkins Homes sites must be identified as the most sustainable development option. The site is a similar distance from Gorse Lodge and development could be designed so as to respect the listed building. While the site does extend slightly further to the west it is bounded to the south by the road and by St. Felix School. Therefore the site would not extend the western edge of Reydon any further into the countryside than it already is. They added that Hopkins Homes understand the local context and consider the site to be in a sustainable location that could deliver housing that is needed in the town. They indicated that a review by civil engineers has confirmed that safe road access could be provided for up to 100 dwellings.

Members of the Public

Four members of the public responded to this site. Three were opposed to development because it would encroach into the AONB and the fourth noted that the site is located on cultivated farmland.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

Development would have a significant adverse impact upon the landscape, which would be greater than the impact from developing on the preferred site.

Site 138 – St. Felix School (Land between St. George’s Square and Lakeside Drive) Halesworth Road, Reydon

Statutory Consultees

No comments were made in response to this site.
Parish and Town Councils

No comments were made in response to this site.

Other Organisations

No comments were made in response to this site.

Developers/Landowners

The landowner notes that the SHELAA has scored this site positively because it is available and achievable but that it has been scored poorly due to failure to provide a replacement playing field. However, they noted planning application DC/15/3288/OUT and supporting section 106 heads of terms have identified a deliverable replacement sports pitch. They noted that the Waveney Planning Committee approved this application on the 11th of July, subject to completion of a section 106 agreement. The section 106 agreement will be scrutinised at a future planning committee prior to conclusion. They stated that the planning situation has changed and a replacement sports field has been identified and delivery will be secured through the section 106 agreement. The site therefore scores well against the Sustainability Appraisal testing criteria (including a replacement pitch) and should be included in the Local Plan.

Members of the Public

Five members of the public responded to this site. Four were opposed to development on this site for the following reasons.

- Encroachment into the AONB.
- Loss of trees.
- Objection to loss of the school playing field to development to support St. Felix School.
- Road safety issues – entrance would be next to a deep dip in the road.
- Contrary to policies in the existing Local Plan.

It was asked why this site has received planning permission even though it has not been selected for allocation in the Local Plan.

How these comments have been taken into account in the Final Draft Local Plan

The site now has a resolution to grant planning permission. The contribution of this site towards housing delivery in the Southwold and Reydon section has been accounted for.
Site 208 – Broadside Park Farm, Reydon

Statutory Consultees
No comments were made in response to this site.

Parish and Town Councils
No comments were made in response to this site.

Other Organisations
No comments were made in response to this site.

Developers/Landowners
No comments were made in response to this site.

Members of the Public
One member of the public suggested this site as an alternative development site given that sites 5, 26 and 38 were already being developed.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid.

This site will not be allocated in the Local Plan because development would have a significant impact upon the Area of Outstanding Natural Beauty, which cannot be mitigated.
Strategy for Rural Areas

Statutory Consultees

South Norfolk District Council supports broadband for economic development in rural areas and note they would be keen to work with Waveney to improve broadband speeds. (Comments pending political approval.)

South Norfolk District Council welcomes the strategy for growth in rural areas, but recommends that some sites with 10 dwelling area allocated 11 dwellings in order to generate an affordable housing obligation. (Comments pending political approval.)

Suffolk Wildlife Trust note that with the exception of site WLP7.4, none of the sites have been subject to a wildlife audit. The Trust recommends ecological assessments are undertaken prior to determining whether to allocate them for development. Should sites be allocated, planning applications must be supported by an appropriate ecological assessment.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

Bourne Leisure Ltd supports the structure of the Draft Local Plan and inclusion of a Strategy for Rural Areas but suggest the difference between ‘rural’ and ‘countryside’ is clarified. Bourne Leisure is concerned that the vision and strategy for rural areas is too focused on housing at the expense of vital industries such as tourism, and does not support the provision and expansion of tourist and visitor facilities. The company suggests some alterations and additions to the wording to rectify this issue.
Developers/Landowners

Morton Partnership Ltd queried why sites have been selected and recommended that allocations of up to 10 houses are allocated to a larger number of villages to lessen the impact of development in rural area, and has submitted an alternative site in Spexhall.

Somerleyton Estate (Lord Somerleyton) supports the Draft Local Plan’s acknowledgment that there has been limited development in the rural areas and the proposed rural strategy.

Members of the Public

Members of the public support the strategy particularly the comments in paragraph 7.2 and 7.4.
How these comments have been taken into account in the Final Draft Local Plan

Text has been added into paragraph 7.1 referencing tourism.

Affordable housing is an important consideration. However, whilst sites that can accommodate 11 more houses benefit from affordable housing contributions, it is not considered appropriate to use this to discount smaller sites or inappropriately increase the density of development.

A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application. Additional text has been added to the rural site allocation policies.

The report ‘Analysis of the Options or the new Waveney Local Plan’ July 2017 that is available online and details the assessments of sites submitted.

Development in rural areas which supports existing services and facilities is considered sustainable and allocating sites of 10 housing across the countryside would not necessarily support existing services and facilities and therefore contribute towards sustainable communities. Small scale sites may come forward as windfall development through a Neighbourhood Plan or if they are in accordance with the Housing policies.

The Strategy for Rural Areas covers all the areas not addressed through the strategies for Lowestoft, Beccles and Worlingham, Bungay, Halesworth and Holton, and Southwold and Reydon in Sections 2 – 6 of the Local Plan. Within the Rural Areas there are villages, and Countryside which include smaller villages and hamlets. It is considered that this is clearly defined in the Overall Spatial Strategy in Section 1 of the Local Plan.

The Countryside is clearly defined in Policy WLP1.3 Settlement Boundaries as land which is outside the settlement boundaries and allocations.

Supporting the growth of the tourism industry has been added in Section 1 of the Local Plan under Strategic Priorities and Objectives.

The Corton Strategy has been removed from Section 7 Strategy for Rural Areas and is now included in Section 2 Strategy for the Lowestoft Area.

Policy WLP7.1 – Rural Settlement Hierarchy and Housing Growth

Statutory Consultees

No comments were made in response to this section/policy.
**Parish and Town Councils**

Ashby, Herringfleet and Somerleyton Parish Council support the 12% allocation of housing in rural areas but are concerned about the number proposed in Somerleyton.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

Benacre Estates Company supports the classification of Wrentham as a larger village.

Gladman Developments Limited considers that the Local Plan should be proactive in encouraging net improvements to sustainability, that the settlement boundaries fail to balance the character of the countryside against the needs of rural communities, and notes that there is no mechanism via which a settlement can migrate up the sustainability ladder.

Hopkins Homes objects to the policy and considers the percentage of rural growth, the number of new homes, and location of new homes in some small villages to be an unsustainable pattern of development.

Somerleyton Estate (Lord Somerleyton) supports the settlement hierarchy, the classification of Somerleyton as a ‘larger village’, and the allocation of 55 new houses in Somerleyton.

The Sotterley Estate supports the overall strategy for rural areas particularly the flexibility given to neighbourhood plans, the classification of Willingham as a ‘smaller village’, and the allocation of 40 dwellings in Willingham.

Strutt and Parker consider more than 12% of growth should be allocated to rural areas, and raised concern about the dependence on strategic sites to deliver a five-year housing land supply. It was noted that Corton is classed as a ‘larger village’ but no housing has been allocated. Strutt and Parker consider Corton could accommodate 100 new houses.

**Members of the Public**

One member of the public supports the policy.

One member of the public supports the policy that larger villages accommodate more development than smaller villages, but not that development in the rest of the countryside should rely on
compliance with other policies. The respondent considers there are sites in the countryside suitable for development and these should be identified in the plan.

One member of the public express concern regarding the allocation of houses in small villages such as Mutford which have limited facilities, and the impact of new houses and increased traffic on the rural character of villages.

**How these comments have been taken into account in the Final Draft Local Plan**

Community services and facilities are addressed in Section 8 of the Draft Local Plan. Policy WLP8.22 supports the provision new services and facilities where appropriate, which would in turn also increase a settlement’s sustainability.

Sites in other rural settlements have been assessed and have not been considered appropriate for allocation the Local Plan. There is the opportunity for Neighbourhood Plans to allocate additional sites and for windfall development in accordance with Housing policies.

The percentage allocation to the rural area, the allocation to individual villages, and the policy for other rural settlements is considered to be in accordance with the Local Plans overall strategy and appropriate for the rural area. Development in rural areas which supports existing services and facilities is considered sustainable.

The classification of Mutford as a smaller village is considered appropriate in the Rural Settlement Hierarchy and Housing growth policy. Mutford’s access to services and facilities is comparable to other settlements classed as a smaller village in the policy.

**Larger Villages**

- **Barnby and North Cove Strategy and Site Allocations**
  - Policy WLP7.2 - Land between The Street and A146, Barnby
  - Alternative sites in Barnby
  - 046 Land at The Swan, Barnby
  - 048 Land at The Green, Barnby
  - 090 Land on The Hill, Barnby

- **Blundeston Strategy and Site Allocations**
  - Policy WLP7.3 - Land south of Lound Road, Blundeston
  - Policy WLP7.4 - Land north of Pickwick Drive, Blundeston
Barnby and North Cove Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

Barnby Parish Council broadly supports the proposed site WLP7.2, considers concentrating development on one site preferable, would like to limit development to 45 houses, and supports the mix of house types proposed. The Parish Council raised several concerns regarding infrastructure including access from the village onto the A146, congestion in front of the school, school places, sewerage system, electricity supply, gas pressure, and flooding. There were requests to incorporate better parking for the primary school into the plans, and retain the trees to the south of The Street.

Barnby Parish Council expresses concern that ‘site 90’ could be development (there is an active planning application for 11 houses on part of this site). There was also a query regarding the need for houses “because there are 11,000 empty houses at present in the area”. It is believed that this
comment relates to an EDP article dated 29th August 2017 which claims there are 11,000 empty houses in Norfolk and Waveney. The article quotes Waveney as having 1,512 empty houses of which 488 have been empty more than six months.

North Cove Parish Council does not consider the villages of North Cove and Barnby as one built up settlement. North Cove Parish Council objects to the site due to the detrimental impact of noise from the A146, the access onto the A146, risk of flooding, sewerage, parking along The Street, the lack of employment in the area, and lack of infrastructure in the village.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public objects to the Barnby and North Cove Strategy and Site Allocations, this member of the public also objects to the site, WLP7.2. The objector claims that both North Cove Parish Council and Barnby Parish Council opposed the site previously and considered it too large, and was concerned that Waveney District Council appears to be disregarding the opinion of two Parish Councils. Concern is raised regarding sewerage and soak aways. The objector does not consider development in Barnby or North Cove necessary due to the development proposed in Ellough/Worlingham.

How these comments have been taken into account in the Final Draft Local Plan

The two villages are next to each other and due to their close physical proximity they appear as one built up area. It is therefore appropriate to consider the impact of any development on the two villages together in the Local Plan.

Access from The Street onto the A146 has been considered further. Suffolk County Council has informed Waveney District Council that one accident has occurred in the last five years near the junction which was classed as “slight”. There is therefore insufficient evidence to support the perception that the junction is dangerous. Transport modelling in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) shows the junction has capacity to accommodate development on the allocated site. There is no evidence that
houses on the allocated site would have a detrimental impact, such that improvements to The Street and A146 junction would be required.

Part of site 90 is subject to an active planning application and any approval would not impact the allocation of the site or the number of houses allocated. Any planning approval on site 90 would be regarded as ‘windfall’ development.

The request for access to the site to be from the A146 to the south has been noted but is not supported by SCC or WDC. Vehicle access from The Street, a residential road with 30mph speed limit, rather than a main road with a 50mph speed limit, would be the safe practical option. Access from The Street is also essential to ensure the development is fully integrated into the village.

The Local Plan identifies the need to increase the number of school places by 15.

Concerns regarding parking along The Street and the request for parking for the school have been noted. The Design Policy requires well integrated car parking; as such the development should not contribute to any issues of on-street parking.

It is not considered necessary to require the retention of the trees along The Street though they may form part of the landscaping. The trees are located on highway land and their retention will be dependent on the design a layout of a footpath along the Street.

Infrastructure issues such as sewerage, drainage and electricity have been noted but do not appear to be insurmountable constraints that would prohibit development in the village.

There was also a query regarding the need for houses “because there are 11,000 empty houses at present in the area”. It is believed that this comment relates to an EDP article dated 29th August 2017 which claims there are 11,000 empty houses in Norfolk and Waveney. The article quotes Waveney as having 1,512 empty houses of which 488 have been empty more than six months. The

Policy WLP7.2 - Land between The Street and A146, Barnby

Statutory Consultees

Suffolk County Council notes that the site is within 400m of a sewage treatment works and should not prejudice the use of the nearby facility. Policy WDM1 of the Waste Core Strategy state the County Council “will object to development proposals that would prevent or prejudice the use of such sites for those purposes unless suitable alternative provision is made.” . (Comment pending political approval.)
Suffolk County Council note that access should be from The Street with a new footway along the frontage.

Suffolk County Council note there is “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.”

Parish and Town Councils

Barnby Parish Council is in agreement with the site as development would allow infrastructure problems to the addressed through S106/CIL funds. The site benefits from bus and cycle routes. The Parish Council seeks assurance that development in the Parish will be limited to 45 over the next 20 years and development of site 90 would result in a proportional reduction on site WLP7.2. The Parish Council requests a roundabout to improve access to the A146. The Parish Council recommends frontages onto The Street are set back, the design is in keeping with local style, existing trees along The Street are kept, and better parking for school.

North Cove Parish Council considers the site is important to the setting of Barnby. Noise from the A146 is considered to be a significant problem, traffic turning onto the A146 has a long waiting time, the site drops in the direction of the Hundred Drain and is prone to flooding, the sewage system cannot cope, and there are parking problems in front of the school. The doctor’s surgeries, school and hospitals are unable to attract staff. North Cove Parish Council opposes the development of the site.

Other Organisations

The Beccles and Bungay Cycle Strategy (Ian Reid) considers the site the most suitable in Barnby, but notes the development should not compromise Cycle Route 30 along The Street.

Developers/Landowners

The owner notes the quality of the farm land is poor, the site is large enough to provide a variety of house types, the site has boundaries formed by The Street and A146, the site is opposite the school, the site does not flood, and the site has excellent access to the public transport and the A146.

Members of the Public

Supporters consider the site the most appropriate location in the village for housing. Supporters note that the site has hard boundaries that would prevent creeping development, is close the A146 keeping traffic in the village to a minimum, has access to a sewage system nearby, and close to bus
routes. The mix of housing, including bungalows will allow ‘down sizing’. The land is not prime agricultural land.

Observations include that Barnby and North Cove are being considered as one settlement and should be regarded as two small villages with development split between the villages and consisting of infill and small developments of up to 10 homes. It is noted that site is 2.80 hectares in size, 0.20 hectares is allocated for open space, with 16 houses per hectares and that this formula results in a total of 40 houses not 45.

Objections to the site include-

- Highway safety concerns due to increased traffic, the existing site access having poor visibility, and existing access onto the A146 being considered dangerous.
- The development would have a detrimental impact on parking and congestion in front of the school.
- The loss of important space that contributes to the character of the village.
- The primary school lacks capacity.
- The lack of amenities specifically no shops, GP surgery, poor mobile signal, poor broadband, and a poor electricity supply that result is frequent power cuts.
- Concern regarding sewerage and surface water drainage for the site.
- The impact on the wildlife corridors.
- The loss of agricultural land.
- Due to the proximity of the A146 the site has limited tranquillity and occupants of the proposed houses would experience a high level of noise and pollution.
- The impact on the views and values of residential properties opposite the site.

Comments include that new houses should be sympathetic, compliment the existing character of the village, and be set back from the northern boundary maintaining the existing building line. It is suggested that the access to the site should not via The Street. There are queries regarding the number of social or affordable houses to be provided, the access into site, and the provision of a roundabout or bypass of the A146 “Barnby Bends”.

**How these comments have been taken into account in the Final Draft Local Plan**

The two villages are next to each other and due to their close physical proximity they appear as one built up area. It is therefore appropriate to consider the impact of any development on the two villages together in the Local Plan.

Access from The Street onto the A146 has been considered further. Suffolk County Council has informed Waveney District Council that one accident has occurred in the last five years near the junction which was classed as “slight”. There is therefore insufficient evidence to support the perception that the junction is dangerous. Transport modelling in the Waveney Local Plan: Suffolk
County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) shows the junction has capacity to accommodate development on the allocated site. There is no evidence that houses on the allocated site would have a detrimental impact, such that improvements to The Street and A146 junction would be required.

Part of site 90 is subject to an active planning application and any approval would not impact the allocation of the site or the number of houses allocated. Any planning approval on site 90 would be regarded as ‘windfall’.

The request for access to the site to be from the A146 to the south has been noted but is not supported by Suffolk County Council or Waveney District Council. Vehicle access from The Street, a residential road with 30mph speed limit, rather than a main road with a 50mph speed limit, would be the safe practical option. Access from The Street is also essential to ensure the development is fully integrated into the village.

The Local Plan identifies the need to increase the number of school places by 15.

Concerns regarding parking along The Street during school drop-off and pick-up times and the request for parking for the school have been noted. The Design Policy requires well integrated car parking; as such the development should not contribute to any issues of on-street parking.

It is not considered necessary to require the retention of the trees along The Street though they may form part of the landscaping. The trees are located on highway land and their retention will be dependent on the design a layout of a footpath along the Street.

Infrastructure issues such as sewerage, drainage and electricity have been noted but do not appear to be insurmountable constraints that would prohibit development in the village. The Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

Dwellings on the site are not considered to prevent or prejudice the use of the sewerage facility which is more than 400m from the site.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

**Alternative sites in Barnby**
046 Land at The Swan, Barnby

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Building and the land owner Ben Blower both support the development of the site.

Members of the Public

One member of the public objects to the site and highlights drainage issues and the lack of infrastructure.

One member of the public prefers this site to site WLP7.2 and another member of the public supports the site if more houses are needed.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The development of this site would have an adverse impact on the rural character of the area and on Swan Lane. The site is less preferable than other sites in the area. The site has not been taken forward in the Local Plan.

048 Land at The Green, Barnby

Statutory Consultees

No comments were made in response to this section/policy.
Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
Badger Building supports the development of the site.

Members of the Public
One member of the public objects to the site and highlights flooding and ecological issues.

How these comments have been taken into account in the Final Draft Local Plan
The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. Parts of the site are in the flood zone and have archaeological potential. Development of the site would have an adverse impact on the setting of a listed building, erode the character of the open countryside, and have a detrimental impact on the setting of the Broads. The site has not been taken forward in the Local Plan.

083 Land off Mill Lane

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

No comments submitted.

090 Land on The Hill, Barnby

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Wellington Construction recommends the site and notes that the WDC Committee resolved to approve an application for dwellings on the northern element of the site.

Members of the Public

No comments were made in response to this section/policy.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site lies within the gap between Barnby and North Cove and there is planning application to development the northern area. Development would have a limited impact of the landscape and rural character of the area. The site has issues with flooding and drainage. The site is less preferable than the allocated site. The site has not been taken forward in the Local Plan.

131 Orchard Farm Rear Fields, New Road, Barnby

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The owner of the site requests the site is reconsidered for development. The owner highlights the need for more housing in the area, the poor quality of the land for farming, and the positive attributes of the site for housing.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is not well related to the existing village, is isolated in the open countryside, and has limited access to services and facilities. Development would have a detrimental impact on the character of the landscape and result in the loss of agricultural land. The site has not been taken forward in the Local Plan.
132 Orchard Farm Rear Fields, New Road, Barnby

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
The owner of the site requests the site is reconsidered for development. The owner highlights the need for more housing in the area, the poor quality of the land for farming, and the positive attributes of the site for housing.

Members of the Public
One member of the public supports the site and considers it will connect the existing properties to Barnby.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is not well related to the existing village, is isolated in the open countryside, and has limited access to services and facilities. Development would have a detrimental impact on the character of the landscape and result in the loss of agricultural land. The site has not been taken forward in the Local Plan.

Blundeston Strategy and Site Allocations

Statutory Consultees
No comments were made in response to this section/policy.
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

Members of the public have responded to the Blundeston Strategy with objections and observations. Objectors have noted that the former prison site is being redeveloped and consider the village should not be required to take additional development. There is concern the cumulative affect will transform the village into a town, the lack of employment opportunities will result in commuting to Norwich, the village lacks the necessary amenities and infrastructure, and the rural roads could not accommodate the additional traffic.

How these comments have been taken into account in the Final Draft Local Plan

Whilst objectors have noted that the prison site is being developed, Blundeston is considered to be of a suitable size and to have sufficient access to services and facilities to accommodate the housing proposed. The amount of housing is in accordance with the Local Plan’s overall strategy.

The proposal to phase the delivery of development would allow the village to accommodate the growth and would have less of an impact than delivering all the sites in the first half of the plan period.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.
Policy WLP7.3 - Land south of Lound Road, Blundeston

Statutory Consultees

The Environment Agency supports the landscaping aspect of the policy.

Suffolk County Council note that access should be located away from the bend to the east and the site should not exceed 16 dwelling as this is a minor road.

Parish and Town Councils

The Parish Council support the use of the site and would consider proposals to development part of the ‘brownfield’ area previously used for horticulture sooner than 2025.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Builders support the allocation but do not consider is reason or necessary to wait to development the site until 2025.

Members of the Public

A respondent notes that the site maybe acceptable subject to significant road improvements. Another respondent notes that the impact of traffic should not be under estimated. There are concerns regarding rural views from Lound Road being block and properties being devalue, and the potential loss of foot path. One respondent recommended other sites in Blundeston and Corton.

How these comments have been taken into account in the Final Draft Local Plan

The 2025 restriction has been removed.

Additional supporting text has been added regarding the location of the access away from the bend in Lound Road.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of...
the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

Policy WLP7.4 - Land north of Pickwick Drive, Blundeston

Statutory Consultees

Suffolk County Council notes that the northern end of Pickwick Drive is not suitable for access to over 25 dwellings.

Parish and Town Councils

The Parish Council supports the use of the site, proposals for open space and play equipment, and need for landscaping. The Parish Council recommends a lower density of 18 dwellings per hectare providing 38 houses. The Parish Council also recommends that an ecological assessment and mitigation measures are carried out in advance of any proposed development. The Parish Council agrees that planning consent should not be considered before 2025.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

There are concerns regarding the “blind bend” at the junction between Market Lane and Pickwick Drive, surface water drainage, and sewerage in the area of Market Lane.

Objectors dispute the wording in the document and reference to 45 houses as a small development and highlight the number of developments approved in Blundeston in recent years. There are objections to the loss of agricultural land, access to site, and the increased traffic that would result from the proposal. Objectors note the lack of footpaths and safe cycle paths, and that the local pond could not cope with the additional surface water runoff. One respondent recommends other sites in Blundeston and Corton.

Supporters of the site consider it a natural choice for development but question the need for a play space when there is a large well equipped play area beside the village hall.
How these comments have been taken into account in the Final Draft Local Plan

The proposed density is in keeping the density of the surrounding houses and makes the best use of the land available.

A requirement for an ecological assessment is included in the policy.

The policy has been amended to include a restriction limiting access to 25 new dwellings from Pickwick Drive with the remainder accessed via The Pippins.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

Whilst objectors have noted that the prison site is being developed, Blundeston is considered to be of a suitable size and to have sufficient access to services and facilities to accommodate the housing proposed. The amount of housing is in accordance with the Local Plan's overall strategy.

Alternative sites in Blundeston

020 Hall Road, Blundeston

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Parish Council agreed with the conclusions regarding the site.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public recommended this and several other sites for development.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is isolated from the main village and relates poorly to the redevelopment of the former prison site. Development of the site would have an adverse impact on the setting of a listed building, landscape and character of the village. The site has not been taken forward in the Local Plan.

027 Land off The Loke, Blundeston

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Parish Council agreed with the conclusions regarding the site.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public recommended this and several other sites for development.
How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. On its own the site is prominent in the open countryside and not well related to the built-up area. The site is less preferable than other sites in the area. The site has not been taken forward in the Local Plan.

029 Land adjacent Millennium Green, Church Road, Blundeston

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Parish Council agreed with the conclusions regarding the site which is an important open space that compliments the adjacent Millennium Green.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public recommended this and several other sites for development.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. Development of the site could have an adverse impact on the setting of listed buildings and the character of the village. The site is less preferable than other sites in the area. The site has not been taken forward in the Local Plan.
042 Land at Market Lane, Blundeston

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
The Parish Council strongly opposes the loss of such a large amount of Grade 1 agricultural land and development of houses, and considers it would have an adverse impact on the character of the village and roads.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
One member of the public recommended this and several other sites for development. Two members of the public object to the development of the site due to the detrimental impact development would have on the village, infrastructure, and the loss of agricultural land.

How these comments have been taken into account in the Final Draft Local Plan
The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The scale of the development is considered inappropriate in conjunction with the redevelopment of the former prison site. Development could have an adverse impact on the character of the village and existing infrastructure. The site is less preferable than other sites in the area. The site has not been taken forward in the Local Plan.

063 Land East of Flixton Road, Blundeston

Statutory Consultees
No comments were made in response to this section/policy.
Parish and Town Councils

The Parish Council strongly opposes the loss of such a large amount of Grade 1 agricultural land and development of houses. The Parish Council considers the site isolated from the heart of the village and that the development would have an adverse impact on the character of the village.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public agrees with the conclusions regarding the site.

How these comments have been taken into account in the Final Draft Local Plan

Support for not taking forward the site in the Local Plan is noted.

190 Land off Hall Road, Blundeston

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

Blundeston Parish Council opposes the development of this site.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public recommended this and several other sites for development. Another member of public considers the site prime agricultural land, access to the site poor, and local roads unable to cope with increased traffic.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The site is not well related to existing built up area. Development would result in the loss of high quality agricultural land, would have an adverse impact on several listed buildings, and have a detrimental impact on the character of the village. The site has not been taken forward in the Local Plan.

Corton Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Comments were submitted on behalf on the owner of site 114 disputing the exclusion of the site and suitability of the preferred site WLP2.12. The owner considers the creation of new garden village to be a less sustainable approach than permitting the development of site 114, and it and will result in children having to travel to a new school.
Members of the Public

Objectioners are concerned the new garden village would have a detrimental impact on the village of Corton and of views from north Lowestoft. Objections included the size of the development, lack of any integration, the impact on the character of the village, the location near sewage works, and the impact on tourism.

One member of the public responded that site should not be included in the Lowestoft allocation, the site is located in the Parish of Corton, and the houses should count towards the rural allocation. The member of the public noted that building heights should be increased in Lowestoft to prevent development spreading over green fields.

How these comments have been taken into account in the Final Draft Local Plan

The Coastal Change Management Area plan predicts that in 100 years the coastline will have moved resulting in access from site 114 into the village being lost. Corton Primary School has insufficient capacity to accommodate additional school children from development on this site, and does not have the potential to expand.

Alternative Sites in Corton

114 Land to the south of Church Lane, Corton

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Strutt and Parker don’t consider the lack of capacity in the school should prevent the development of the site and none of the issues raised are insurmountable and could be mitigated.
Members of the Public

One member of the public considers development of this site it would be less harmful to Corton than site WLP2.12. One member of the public recommends the site and several others in Blundeston for development. Another member of the public has noted the RSPB is active on the site.

How these comments have been taken into account in the Final Draft Local Plan

The site has been reviewed and the conclusions in the ‘Analysis of the Options for the new Waveney Local Plan’ published July 2017 remain valid. The primary school does not have capacity. The Coastal Change Management Area plan predicts that in 100 years the coastline will have moved resulting in access from site 114 into the village being lost.

Kessingland Strategy

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Kessingland Parish Council has no objections and note the Neighbourhood Plan has been incorporated into the Local Plan.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Builders support the allocations in the neighbourhood plan.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

No changes to the overall strategy are considered necessary.
Somerleyton Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Parish Council considers a total of 55 houses over 18 years excessive and the number should be reduced to allow the village to absorb the new dwellings. The Parish Council is concerned about the capacity of the school and believes Waveney District Council should commit to outstanding design.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Somerleyton Estate (Lord Somerleyton) broadly supports the draft Local Plan including the quantum of development proposed in Somerleyton and the provision of design briefs.

Members of the Public

Comments included support for more affordable family homes and single storey residences for the elderly, and that the proposed sites are well chosen.

Concerns and objections were raised regarding –

- The quantity of development.
- The capacity of the school, village hall and village infrastructure to absorb the proposals.
- The Conservation Area and listed buildings should be protected from large developments which would spoil the village.
- The roads could not cope with the increased traffic.
- The developments will result in increased on-street parking causing road safety concerns.
- Concern regarding land contamination of the former garage site.

One respondent considered paragraph 7.41 to be incorrect due to the lack of a bus service, village shop, post office, and an intermittent train service, and disputed paragraph 7.42 and does not considered the green to be the heart of the village.
How these comments have been taken into account in the Final Draft Local Plan

The number of dwellings on site WLP7.6 has been reduced to address concerns regarding the cumulative impact of housing in the village. The reduction in the size of the site specifically takes into account suggestions from the Parish Council.

Housing policies require a mixture of housing types including 1 and 2 bedroom properties and affordable homes. The design policies require the development to respond to the local area. Heritage policies state development should conserve or enhance Heritage Assets and their settings. The Neighbourhood Plan has the opportunity to create a design code/brief for the site at Mill Farm giving the local community further involvement. These policies together provide a structure for producing an appropriate development/design.

Somerleyton is a village with limited facilities, nevertheless there are sufficient facilities to justify its status as a larger village and accommodate some growth.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

The developments are required to provide on-site parking to prevent increased pressure on street parking.

The policy for the land north of The Street requires the Forge on site to be protected and contamination investigation to be carried out.

Policy WLP7.5 - Land North of The Street, Somerleyton

Statutory Consultees

The Environment Agency supports the statement regarding land contamination.

Historic England is concerned about the impact of development on the Conservation Area and on adjacent heritage assets.

Suffolk County Council notes that there should be direct access from The Street or improvements to the Loke. (Comment pending political approval.)
Parish and Town Councils

The Parish Council consider the number of dwellings proposed should be reduced to take into account proposals to convert the old Forge Garage office into a shop, and that the dwellings should have a maximum of three bedrooms. The Parish Council recommends the preparation of a design code/brief for the site as either part of a Neighbourhood Plan or as a Supplementary Planning Document.

Other Organisations

The Suffolk Preservation Society (Fiona Cairns) recommends less housing on only the brownfield part of the site.

Developers/Landowners

Somerleyton Estate (Lord Somerleyton) supports the allocation and confirms the site remains available, achievable and deliverable going forward.

Members of the Public

One member of the public noted that Japanese knotweed is growing in places, the land is used as a family garden with 200 trees recently planted, hoped to use the land in association with a cycle business, and had concerns including the impact on wildlife, increased light pollution, and the impact on the residential amenities of the dwelling, Jernigan.

Supporters had no objection provided more affordable family homes and single storey properties were provided, the local facilities were improved, the maximum dwelling size is three bedrooms, and the existing building at the front of the site is retained as a shop.

Concerns and objections were raised regarding the number of housing, the proposed density, increased traffic, parking, and whether the Forge Garage Office will be retained as a shop. Respondents considered that the number of houses should be reduced, or that housing proposed in Blundeston and North Lowestoft was sufficient with any development in Somerleyton.

How these comments have been taken into account in the Final Draft Local Plan

Direct access from The Street is currently available to provide access to the site. The layout is subject to detailed design.
The number of dwellings on site WLP7.6 has been reduced to address concerns regarding the cumulative impact of housing in the village.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

Housing policies require a mixture of housing types including 1 and 2 bedroom properties and affordable homes.

The developments are required to provide on-site parking to prevent increased pressure on street parking.

The policy for the land north of The Street requires the Forge on site to be protected. The policy does not specify that a shop should to be included on site as there is no evidence to support that this the best location for a shop.

Given the small scale nature of this site, it is not considered appropriate to require a design code/brief.

**Policy WLP7.6 - Mill Farm Field, Somerleyton**

**Statutory Consultees**

Historic England is concerned about the impact of development on the Conservation Area and on heritage assets. Historic England considers the current settlement pattern should be considered when determining housing density and quantity, and recommends an indicative masterplan is included.

Suffolk County Council requests they are consulted as the mineral planning authority if a planning application comes forward, and that some consideration is given to using some of the on-site mineral resources in any resulting development, to reduce the amount of material transported on and off the site. (Comment pending political approval.)

Suffolk County Council notes that a footway along the site frontage and sustainable links through the site should be provided. (Comment pending political approval.)
Parish and Town Councils

The Parish Council considers 45 houses excessive and would prefer only the main field is developed, not the two smaller fields to the east. The Parish Council would also wants the density reduced to 15 dwelling per hectare and the 35% of affordable housing to be strictly adhered to.

Other Organisations

The Suffolk Preservation Society (Fiona Cairns) recommends the policy includes a requirement for any planning application to include a Heritage Asset Assessment.

Developers/Landowners

Somerleyton Estate (Lord Somerleyton) supports the allocation and requirement for exceptional design, and confirms the site remains available, achievable and deliverable going forward.

Members of the Public

Supporters consider that the village needs more housing, the design as suggested should be low in density, and considered the site is a good choice. A recommendation was made that only the west field and not the two east fields were development with 15 dwellings per hectare. It is requested that the present policy for no street lighting is retained.

Objectors consider the development would have a detrimental impact on the village due to the excessive number of houses proposed, additional traffic, and the lack of existing infrastructure to support the development. Objectors question the need for any houses and do not want low quality/affordable housing in the village.

A query was raised regarding why access should be from Station Road not The Street, and highlighted the lack of footpaths and that the road is very narrow. It is noted that the development would over look existing properties.

How these comments have been taken into account in the Final Draft Local Plan

The policy includes a requirement for a Heritage Assessment to be undertaken.

The site has been reduced from 3.03 hectares to 1.9 hectares, and the open space has been reduced from 0.5 hectares to 0.2 hectares. The number of houses has been reduced from 45 to 35.

The Neighbourhood Plan is to be given one year to provide a design code/brief for the site before Waveney District Council produces a Supplementary Planning Document. This may include an
indicative masterplan. The Neighbourhood Plan may also consider the housing mix (see policy WLP8.1) and the amount of affordable homes (see policy WLP8.2) on site, subject to supporting evidence.

The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

002 Allotment land

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

No comments submitted.
074 Land north of Morton Peto Close

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan
No comments submitted.

099 Land south east of Brickfields

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

www.eastsuffolk.gov.uk/newwaveneylocalplan 1073
Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan
No comments submitted.

128 Mill Farm

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan
No comments submitted.
**135 Playing Field**

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

No comments submitted.

**Wangford Strategy and Site Allocations**

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

Policy WLP7.7 - Land North of Elms Lane, Wangford

Statutory Consultees

Historic England note that site boarders the Conservation Area and this is not reflected in the text.

Suffolk Coast & Heaths Area of Outstanding Natural Beauty (Paula Booth) consider the allocation contrary to the NPPF paragraphs 115 and 116, the impact of development can not assessed without a detailed proposal, and a Landscape and Visual Impact Assessment should be submitted.

Suffolk County Council recommends that archaeological work could be undertaken as a condition on consent. (Comment pending political approval.)

Suffolk County Council notes that a footway along the site frontage that links to the existing should be provided where feasible. (Comment pending political approval.)

Suffolk County Council notes that “Depending on sites previous use for mineral extraction their may be an inability to infiltrate, potential contaminants.” (Comment pending political approval.)

Parish and Town Councils

The Parish Council has no objections.

Other Organisations

The Suffolk Preservation Society recommends the policy includes reference to the AONB and policy WLP8.33.

Developers/Landowners

No comments were made in response to this section/policy.
Members of the Public

The objections, observations and concerns include -

- Elms Lane is narrow, has few passing places, is used as cut through, and would be overloaded by the additional traffic from 16 homes.
- Additional properties would have an adverse impact on the existing surface water drainage, the sewerage system, and there is large water main running across the site to Southwold.
- The village lacks sufficient services and facilities to support new dwellings such as no school.
- Loss of agricultural land.
- The site is used by badgers.
- The development would have a detrimental impact on the Area of Outstanding Natural Beauty.
- The site is outside the village’s settlement boundary.

Concern was raised regarding the increase in second homes in the area, and that the proposal would form a ‘housing estate’ out of character with the village. There was a query regarding the mix of housing with a preference for affordable and social housing to dominate the site, and a request for the hedgerow to be preserved as it contributes to the character of the lane.

How these comments have been taken into account in the Final Draft Local Plan

The policy has been amended so that archaeological works should be a condition of a consent.

The policy has been amended to require a Landscape and Visual Impact Assessment with any planning application.

The supporting text has been amended to note the sites location in the Area of Outstanding Natural Beauty and it proximity to the Conservation Area.

Site WLP7.8 has been removed from the Local Plan due to the lack of primary school places available within the area.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site.

Policy WLP7.8 - Land North of Wangford Road, Wangford
Statutory Consultees

Historic England note that site boarders the Conservation Area and this is not reflected in the text.

Suffolk County Council recommends that archaeological work could be undertaken as a condition on consent. (Comment pending political approval.)

Suffolk County Council notes that a sustainable link to the village centre should be provided and would be concerned if not feasible. (Comment pending political approval.)

Suffolk County Council notes there is a small pocket of 1 in 100 surface water flood risk on western boundary. (Comment pending political approval.)

Parish and Town Councils

The Parish Council has no objections.

Other Organisations

The Suffolk Preservation Society recommends the policy includes reference to the AONB and policy WLP8.33.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

Fourteen members of the public responded with observations and objections. There is one supporter of the site.

- It is considered that access into the site would be dangerous due to the sharp bend and busy road.
- Several people consider that the village lacks the infrastructure to support the development particularly due to the lack of a school.
- Many consider the visual impact of the development would be detrimental to both the village, views of the countryside, and the Area of Outstanding Natural Beauty.
- There are concerns regarding the loss of agricultural land and requests that brownfield sites should be used.
- The development would be out of keeping with the linear development in Wangford.
- There is concern regarding the lack footpaths into the village.
People are sceptical or disagree that there is a need for extra housing and are concerned that the houses will become second homes or holiday lets. There are also concerns that developers would erect a higher density and number of houses, and that the development would extend beyond the boundaries of the site. One person is concerned that the density of housing is too low and would result in small plots with inadequate parking.

How these comments have been taken into account in the Final Draft Local Plan

Site WLP7.8 has been removed from the Local Plan due to the lack of primary school places available within the area.

Alternative sites for Wangford

031 Land adjacent to Little Priory, Wangford

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public recommends this site.

How these comments have been taken into account in the Final Draft Local Plan

No comments submitted.
Wrentham Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

The Parish Council is satisfied with the preferred approach but note that site has increased to include an area in the flood plain and an attenuation pond.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Benacre Company support the allocation of housing on sites WLP7.9 and WLP7.10 together with the overall aims and aspirations of the draft Local Plan.

Members of the Public

Two members of the public responded. One querying why WLP7.9 is to have 15 dwelling to the hectare with a building height restrictions and WLP7.10 is to have 20 dwellings to the hectare with no height restriction. One objected to the size of the development and considers there are insufficient services and facilities to support the developments.

Policy WLP7.9 - Land North of Chapel Road, Wrentham

Statutory Consultees

Historic England note that whilst listed buildings have been identified in the supporting text, the Priory, Priory Farmhouse, and the Conservation Area have not been identified.

Suffolk County Council notes that a footway along the site frontage and a Transport Statement should be provided. (Comment pending political approval.)

Suffolk County Council notes that there is a significant surface water flood risk on the northern boundary of site, ordinary watercourse is sensitive and frequently floods. (Comment pending political approval.)
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Benacre Company support the allocation of housing on sites WLP7.9 but queries the proposed density and number of dwellings and recommends that these figures should be approximate to allow for some flexibility and consistency with other policies.

Members of the Public

A respondent noted that the village has a lot of older residents living in large properties and recommend bungalows to enable people to downsize while still remaining in the area and freeing up large properties for families. Comments also note that an existing attenuation pond is not properly maintained with it being unclear who is responsible.

Objections and observations include –

- There sewage and drainage problems in the area.
- There are designated lay-bys for school buses.
- 3-4 school buses stop on Chapel Road a day.
- The Chapel Road/A12 junction is already a hazard and is unable to support additional traffic.
- There is no school in the village to support the development.
- The Doctor’s Surgery would be unable to register additional facilities.
- The risk of flooding.
- There are few employment opportunities.
- No leisure and entertainment facilities for families.
- Wrentham has just received a development at Meadowlands.
- No green fields should be built on until all the brownfields sites in Lowestoft have been developed.
- The development will not add to/will have a detrimental effect on the rural character of the village.
How these comments have been taken into account in the Final Draft Local Plan

Reference to the Conservation Area and listed buildings on Priory Road has been added to the supporting text.

A requirement for a footway along the frontage with Chapel Road has been added into the policy.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site and on to the A12.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

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Policy WLP7.10 - Land West of London Road, Wrentham

Statutory Consultees

Suffolk County Council notes access to the site off the A12 should be designed to reflect the road hierarchy and Transport Statement is required. (Comment pending political approval.)

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Benacre Company support the allocation of housing on sites WLP7.10 but queries the proposed density and number of dwellings and recommends that these figures should be approximate to allow for some flexibility and consistency with other policies.
Members of the Public

It was noted that there is a need for bungalows and properties that can be adapted for the elderly. Concerns were raised regarding design, insufficient parking and lack of disabled access that have been noted at other developments.

Objections include –

- The use of any green field sites for development.
- No green fields should be built on until all the brownfields sites in Lowestoft have been developed.
- The field contributes to the character of the village.
- Access to the site is awkward.
- The road has a dip with poor visibility and a blind spot.

How these comments have been taken into account in the Final Draft Local Plan

Site WLP7.8 has been removed from the Local Plan due to the lack of primary school places available within the area.

Alternative sites for Wrentham

213 Land east of London Road, Wrentham

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.
Members of the Public

One member of the public recommends this site.

How these comments have been taken into account in the Final Draft Local Plan

No comments submitted.

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Smaller Villages

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Sotterley Estate supported the number of houses allocated to Willingham.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

Comments noted. No changes necessary.

Brampton with Stoven Strategy and Site Allocations

Statutory Consultees

Suffolk County Council stated that there was no water discharge strategy evident.

Parish and Town Councils

Brampton and Stoven Parish Council stated that they understand that development is necessary within the District and that Southwold Road is the most logical site to develop in this area. They supported the inclusion of a new village hall and play facilities, as well as infrastructure improvements and the school expansion as these will help promote community cohesion. They
suggested that Brampton Primary School should be consulted on any plans for the new village hall so that it could help meet their needs.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

One landowner stated that they owned land that would not impact upon existing residents which could be considered and own land near the Station car park that could be used to extend the car park.

**Members of the Public**

Members of the public generally objected to this strategy stating that the amount of development proposed for the area is disproportionately large compared to the size of the village and that the current infrastructure, such as the school and roads, would not support further development in the area. Other issues included the potential increase in traffic from development.

Concerns were also raised about the larger allocation being located far from the Station and the increase in car journeys to the Station resulting from this. It was also suggested that the land to the east of Brampton Station could be used to fill the gap between the Station Hill Cottages and the Station.

**How these comments have been taken into account in the Final Draft Local Plan**

The Council considers that a development of the size proposed south of Southwold Road ensures the deliverability of the community services and infrastructure associated with it and therefore justifies the developments scale. A smaller development would reduce developer contributions from the development and could therefore harm the deliverability of the proposed community centre. The local community will be consulted by the developer on the development plan which will allow any local concerns to be raised.

The sites for Brampton have been chosen to help maintain the sustainability of the area by delivering new community facilities and providing the population to support existing services such as the primary school and railway station. Allocating any more development or reducing the development to infill gaps would undermine the aims of the overall strategy and this policy, and so the initial allocations were maintained.
The cumulative impacts on the road network of the new development across the District has been assessed in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018). This does not identify any significant issues with the exception of the Bloodmoor Roundabout junction in Lowestoft. Mitigation measures for this have been identified.

**WLP7.11 - Land South of Southwold Road, Brampton**

**Statutory Consultees**

Historic England raised concerns that The Old Rectory, Brampton Hall and Church of St Peter were not referenced in the supporting text when they could be impacted by the proposed development. They also stated that there were inconsistencies with the Strategic Housing and Economic Land Availability Assessment stating that there is no historic impact but the policy saying there may be an archaeological impact.

Suffolk County Council stated that a footway should be provided along the site frontage, the car park is adequate for its uses and that a Transport Assessment should be required.

**Parish and Town Councils**

Brampton and Stoven Parish Council supported this site stating that it makes the most logical sense for development and supported the development of new community facilities and a car park. They added that the development will necessitate the need for improvements to Southwold Road including the provision of kerbs and improved edging. The Council would like to see the area’s proportion of affordable housing maintained and the development of new footpaths to connect the new development to the existing. The Council added that they wish to be involved in any discussions relating to the site to ensure that any development is beneficial to the local area and is in keeping with the character of the settlement.

**Other Organisations**

The Suffolk Preservation Society objected to this site stating that the development proposed is disproportionately large compared to the size of the village and the effects would be difficult to mitigate.
Developers/Landowners

The landowners of the proposed allocation supported its inclusion in the Local Plan on the grounds of providing new homes for the area and the delivery of new infrastructure to support the current and any future population. They also confirmed its immediate availability.

Members of the Public

One member of the public supported this site stating it is the best area for development.

One member of the public stated that the proposed allocation is disproportionately large for the village; however they added that some development opposite the school would be reasonable as long as farmland and wild areas were protected and pollution was kept to a minimum.

How these comments were taken into account in the Final Draft Local Plan

The supporting text of the policy has been amended to include reference to The Old Rectory, Brampton Hall and the Church of St. Peter.

The Strategic Housing and Economic Land Availability Assessment does not include reference to archaeological issues as there is limited potential.

The need for footpath improvements and connections between the proposed site and existing development is noted and has been included in the policy.

It has been considered that a development of this size ensures the deliverability of the community services and infrastructure associated with it and therefore justifies the development scale. A smaller development would reduce developer contributions from the development and could therefore harm the deliverability of the proposed community centre.

WLP7.12 - Land at Toodley Farm, Station Road, Brampton

Statutory Consultees

Suffolk County Council stated that there is no discharge strategy evident.

Parish and Town Councils

Brampton and Stoven Parish Council objected to this allocation stating that while there is some wider community support for the site however some residents adjacent to the site had expressed concern that the area is a poor choice for development. The Council supported improvements to the
station car park. Development would have to be sympathetic to the rural character of the area and there is an issue with speeding along Station Road and any development would need to assist with speed reduction in the area.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The landowners of the proposed allocation supported its inclusion in the Local Plan. They suggested that the site specific criteria are overly restrictive and suggested the allocation be increased to 10 dwellings stating this could provide a wider variety of housing. They also stated that the requirement for 4 pairs of semi-detached dwellings is overly restrictive. They questioned the stated effect on nearby historic buildings, including Shingle Hall, and the potential effect on the foul sewerage network which they believe could be easily mitigated.

Members of the Public

Members of the public generally objected to this site. Concern was raised over current infrastructure provision and how this would cope with new development, specifically sewerage, water and electricity provision. Other specific concerns were raised over the road network’s ability to cope with the increased traffic and pollution, especially considering the road is narrow, national speed limit, close to a handicap school and is often used by horse riders. Concerns were also raised about the limited capacity of the local Station car park and that new development in the area would not be sympathetic to the rural character of the area and would devalue properties. Members of the public believed that the site could not be sold to a private developer due to the sites ties to its current agricultural use.

One member of the public stated that the local gardens and farmlands are home to Great Crested Newts and that development could include the provision of unwanted light pollution through street lighting. Another member of the public raised concerns over flooding and runoff in the area especially during winter months which could be exacerbated by new development. They did acknowledge that development could bring in younger families to help support the local area. One member of the public questioned whether housing is needed in this area when there are other sites in built up areas. There was a concern that this could set a precedent for building more houses in the area and could attract second home owners.

Members of the public enquired about other pieces of land further along Station Road, the land owned by Lord Prior and land at Moll’s Lane.
How these comments were taken into account in the Final Draft Local Plan

The site is in a rural location and development should reflect the character of the small settlement. There is currently demand for self-build plots in the countryside, therefore this policy has been amended so that it can meet some of this demand in a reasonably sustainable location. The allocation will be subject to other policies in the local plan, such as Landscape Character and the Design policies, which have been created to protect local distinctiveness which will ensure that any development is appropriate and is not detrimental to the local character.

The requirement for semi-detached properties has been removed.

A development of 8 homes will have only a negligible impact on the road network.

A requirement for an ecological assessment has been added to the policy.

Flood risk mapping shows that this area is close to areas at risk of surface water flooding. A small part of the site to the north is a risk of surface water flooding however the size of the area is negligible. Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

The other sites suggested for this area were not taken forward due to them being poorly related to the existing built settlement and more distant from the rail station. Developing these areas would cause greater encroachment into the countryside.

Brampton with Stoven Alternative Sites

095 Land opposite 1-8 Wood End Cottages Southwold Road Stoven

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.
Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

097 Land opposite Stoven Row, Southwold Road, Stoven

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.
How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

### 144 Station Road and Moll’s Lane, Brampton

**Statutory Consultees**
No comments submitted in response to this site.

**Parish and Town Councils**
No comments submitted in response to this site.

**Other Organisations**
No comments submitted in response to this site.

**Developers/Landowners**
No comments submitted in response to this site.

**Members of the Public**
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

### 157 West of Redisham Road, Brampton

**Statutory Consultees**
No comments submitted in response to this site.

**Parish and Town Councils**
No comments submitted in response to this site.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The landowner of site 157 has stated that they would like to resubmit the site, reducing the size to 0.6 hectares. They stated that the site is close to the centre of Redisham and employment opportunities as well as the railway station and could be linked to regular public transport.

Members of the Public

One member of the public supported this site as it would have a limited effect on existing dwellings and is close to a sewerage works.

How these comments were taken into account in the Final Draft Local Plan

This site was looked at again considering the smaller scale being proposed. It was considered that the smaller scale did not mitigate the factors that made the site unsuitable during the initial assessment, namely its isolated location, and so the site has not been taken forward.

158 Wood Cottage, London Road, Brampton, Suffolk

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.
Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan

No comments submitted.

Homersfield Strategy

Statutory Consultees

The Environment Agency supported this strategy stating that the water meadows are important habitats and flood water storage areas and should be protected.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments were taken into account in the Final Draft Local Plan

Comments noted. No changes necessary.

Ilketshall St Lawrence Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.
Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
No comments were made in response to this section/policy.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

WLP7.13 - Land South of Hogg Lane, Ilketshall St Lawrence

Statutory Consultees
Suffolk County Council stated site represents a pre-18th century enclosure and the boundaries, layout and any historic features within the site should be retained as much as possible. They suggested that the policy should be amended to support this. It was also stated that the footpath should be extended along the site frontage at that the 30mph speed limit should be extended.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
The Suffolk Preservation Society objected to the scale to this site stating that the effects of the proposed development would be difficult to mitigate.
Developers/Landowners

No comments submitted in response to this site.

Members of the Public

Members of the public objected to this site. Concerns were raised over the potential impact on property values and the effect of additional traffic on the road network and pedestrian safety, especially at Hogg Lane where the road is considered to be too narrow and already suffers from commercial and school traffic issues as well as speeding. Some residents have expressed that they struggle to enter and exit their properties in their vehicles due to these issues. There is also no pavement linking the site to the school. Concerns were also raised about other infrastructure issues, specifically the sewerage system being overstretched as well as policing and healthcare provision. There were fears that the play area could attract anti-social behaviour and increase litter and noise pollution. Flooding and drainage issues were also mentioned to be prevalent in the local area. Objections were also raised to the use of agricultural land for development. One member of the public objected to the fact that the development does not fit within the village boundaries. Another member of the public objected stating that it would intrude on their privacy. It was also stated that the development is disproportionately large in relation to the village and it was questioned whether there is sufficient demand in the area to justify this allocation.

How these comments were taken into account in the Final Draft Local Plan

The policy has been amended to take into account the historic field patterns of the site and ensure their preservation.

The policy has been amended so that development on this site would be of a scale similar to that of the nearby Poplars development. This will help ensure the deliverability of the play area whilst still being at a low enough density as to not be detrimental to the local rural character. The policy also includes the need for a quality landscaping scheme which should mitigate any affect on the wider landscape and could help mitigate any effects on the privacy of neighbouring properties. The policy already includes a requirement to extend to the footpath towards the school.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

Small parts of the site are at risk of surface water flooding. Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.
Ilketshall St Lawrence Alternative Sites

192 Opposite Osborne House Barn, Ilketshall St Lawrence

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

193 School Farm, Ilketshall St Lawrence

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

One member of the public supported the inclusion of this site.

How these comments were taken into account in the Final Draft Local Plan

This site was not taken forward as it is not considered to be in a sustainable location and is poorly related to the existing built up areas on Stone Street.

Lound Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

Lound Parish Council stated that housing should be sympathetic to the local character and affordable. They added that parking on The Street is already a concern that will be made worse by additional development and this should be considered.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Somerleyton Estate raised concerns over the consistency of the sustainability appraisals for Lound and believes that the conclusions from these were wrong. They believe the site at Snakes Lane (Site 75) should be included instead of or as well as the current allocation.
Members of the Public

One member of the public objected to the proposed site stating that they bought the land last year and will not be offering it for development of any kind. They stated that developing this area would seriously impact upon the rural character and privacy of the area as well as reducing house values. Local infrastructure, including roads, schools and GPs, can’t accommodate development and there will be a detrimental impact on local wildlife. There is also an issue of flooding during moderate rain for the roads coming in and out of the area.

How these comments were taken into account in the Final Draft Local Plan

The policy already contains some requirements to help mitigate the impact of developing this site on the local character, including development being set back from the road and the need for a landscaping scheme. The policy also already contains a requirement for parking so that development does not add to the issues already seen on The Street.

Issues relating to privacy will be dealt with at the planning application stage.

The sustainability appraisal for site 75 was reconsidered and found to be inconsistent with those for the other nearby sites. However, the site was not taken forward due to its impact to a nearby listed building.

The site boundaries have been corrected to the landowners specifications.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

WLP7.14 Land East of The Street, Lound

Statutory Consultees

Historic England raised concerns over the number of houses allocated on this site and the potential effect on the Church of St John the Baptist. They supported the inclusion of a heritage assessment but believed the number of houses and their layout should be reconsidered.

South Norfolk District Council stated that this site should be considered for 11 dwellings to generate an affordable housing obligation. However they did accept that this site may be too small to do this.

Suffolk County Council stated that the policy for this site should be amended so that it can manage any archaeological work that takes place on the site. It was also stated that the access should be moved away from the slight bend.
Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

The Suffolk Preservation Society objected to this site due to its impact on the setting and views of and from St Johns Church.

Developers/Landowners

The landowner of the proposed site stated that the published boundary of the site is different to what they own. The boundary has now been altered to their specifications.

The Somerleyton Estate objected to this allocation stating that the sustainability appraisals used to assess this site and site 75, which was submitted by the Somerleyton Estate, are inconsistent, especially in terms of evaluating access to services and the impact on historic environment. They suggested that these appraisals should be reconsidered and site 75 should be considered along with or instead of the proposed site.

Members of the Public

Members of the public were split regarding this site.

Some members of the public supported the site in principle but suggested some potential policy requirements. One suggested that development should be permanently affordable housing, trees and hedges should be protected, hard surfaces should be gravelled, views to the church from The Street should not be restricted and there should be no building adjacent to Nether End Cottage. Another suggested that the houses should be small, there should be open space between any dwellings and the existing dwelling bordering the site and that the access to the site will need to be well designed as it will be located on a curve.

Other members of the public opposed this site, raising concerns regarding increased traffic and the effect this could have on the parking issues that are already seen especially for the adjacent properties. Another member of the public stated that new residents will have to commute for work as there is no employment within the village. Residents have also observed issues with speeding. They added that the sewerage system would not be able to cope with new development. Another member of the public opposed the site stating that they own part of the land that forms the site boundary. They also opposed on the grounds of the loss of light and overshadowing on their own property, insufficient infrastructure provision, noise pollution and landscaping issues.
One member of the public stated the priority should be for a parking area for residents.

**How these comments were taken into account in the Final Draft Local Plan**

It is considered that 10 dwellings can be accommodated on the site without impacting on the setting of the church.

The supporting text also already acknowledges parking issues on The Street. An additional requirement has been added to the policy to tighten this requirement.

The policy also already contains reference to archaeological work which will be necessary for any development to take place.

The site would not be viable for 100% affordable housing and there is no justification as to why this site should be 100% affordable whilst others are not.

Hedges and trees are already protected under the policy. Other factors relating to the design and issues of privacy will be determined at the planning application stage.

The site boundary has now been amended to the landowner’s specification.

The sustainability appraisal for site 75 was reconsidered and found to be inconsistent with those for the other nearby sites. However, the site was not taken forward due to its impact to a nearby listed building.

The Local Plan includes policies and allocations for employment development that will help support residential development across the District.

Discussions have been held with the major infrastructure providers in the District to determine the effects of the proposed developments and what mitigation will be needed. These improvements are outlined in the Infrastructure Study which supports the Local Plan.

**Lound Alternative Sites**

**075 Land North of Snakes Lane, The Street, Lound**

**Statutory Consultees**

No comments submitted in response to this site.
Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The Somerleyton Estate objected to this site being discounted stating that the sustainability appraisals used to reach this conclusion are not consistent with the appraisals for WLP7.14, especially in terms of access to services and the impact on the historic environment. They suggested that these appraisals should be reconsidered.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan

The sustainability appraisal for this site was reconsidered and found to be inconsistent with those for the other nearby sites. However, the site was not taken forward due to its impact to a nearby listed building as outlined in the appraisal.

167 Land north of Church Lane, Lound

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.
Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

**How these comments were taken into account in the Final Draft Local Plan**

No comments submitted.

195 Lound Campus, Church Lane, Lound

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

**How these comments were taken into account in the Final Draft Local Plan**

No comments submitted.
Mutford Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

Members of the public objected to this strategy stating that taking agricultural land away for residential development will make it harder for agricultural college students to find placements. There were concerns over the potential increase in traffic and noise especially considering how narrow the road is.

It was suggested that land in the centre of the village would be more appropriate. One member of the public enquired as to whether development could be considered on Holly Lane.

How these comments were taken into account in the Final Draft Local Plan

Brownfield land is the preferred option when allocating sites for development; however the District does not have sufficient brownfield land to meet its housing needs over the course of this Local Plan. Therefore some greenfield agricultural land will be needed for development if the Council is to meet its housing requirement.

Local concerns with the road network have been taken up with Suffolk County Council following the consultation. Following their comments, WLP7.15 has been removed from the Plan due to the limited visibility splay.
WLP7.15 - Land South of Chapel Road, Mutford

Statutory Consultees

Suffolk County Council stated that as the site is located on a bend it will require a large amount of clear land for the visibility splay. It was also stated that the 30mph speed limit will need to be extended.

Parish and Town Councils

Mutford Parish Council supported the inclusion of this site but suggested that there should be criteria for ensuring off road parking as there are already parking issues in the area. They suggested at least 2 or 3 parking spaces per dwelling.

Other Organisations

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty Organisation commented that the supporting text should state that the site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. The allocation would not be considered a major development but the AONB designation will need to be considered. They also suggested that the design should take into account local character as well as sustainable building principles.

The Suffolk Preservation Society suggested that it be referenced that the site is completely within the AONB and is cross referenced with Policy WLP8.33.

Developers/Landowners

Suffolk County Council supported the inclusion of this site, stating that the site can become vacant following planning permission and supported the acknowledgement of the drainage issues seen on this site. Suffolk County Council stated that the policy for this site should be amended so that it can manage any archaeological work that takes place on the site and that they should be consulted on any development to help create a drainage strategy for the site (DRAFT).

Members of the Public

Members of the public generally opposed this site stating the inability of the current road and transport infrastructure to accommodate further development especially in the area close to the allocation. Also mentioned is the long distance from employment areas, the potential impact on local character and the AONB and the negative impact of the construction itself. Safety concerns were also raised in regards to pavements, lighting and traffic calming. The sites ability to support local services such as shops, schools and care was also questioned as there is a lack of these locally.
The area is also subject to flooding and there are significant drainage and sewerage issues in the area. Objections were also raised to the potential effect on decreasing property values. It was also questioned whether development would be able to improve local telecommunications.

Members of the public were concerned over the number of houses being proposed on the site which could overwhelm the local area, especially the Chapel Road area. Another member of the public did acknowledge that the site was in a good position, however expressed concerns over the reference to access from Chapel Road stating that it is too dangerous.

One member of the public suggested that the focus for development in the District should be on the regeneration of Lowestoft.

**How these comments were taken into account in the Final Draft Local Plan**

The comments for this site were taken into account following the consultation and the site was reconsidered. After consulting with Suffolk County Council, the site has been removed from the Local Plan due to the limited visibility splays form the site. This makes access to the site dangerous unless substantial changes are made to the road and speed limit which would significantly limit the development potential of the site.

**WLP7.16 - Land North of Chapel Road, Mutford**

**Statutory Consultees**

Suffolk County Council stated that infiltration should be confirmed on the site for drainage purposes.

**Parish and Town Councils**

Mutford Parish Council supported the inclusion of this site but suggested that there should be criteria for ensuring off road parking as there are already parking issues in the area. They suggested at least 2 or 3 parking spaces per dwelling.

**Other Organisations**

The Suffolk Preservation Society stated that the policy should include reference to the site being adjacent to the AONB and should be cross referenced with Policy WLP8.33.

**Developers/Landowners**

Suffolk County Council supported the inclusion of this site, stating that the site can become vacant following planning permission.
Members of the Public

Members of the public objected to this site stating that there is already traffic and parking problems in the area as well as issues with speeding. One member of the public objected referencing the long distance from employment areas, the potential impact on local character and the negative impact of the construction itself. Safety concerns were also raised in regards to pavements, lighting and traffic calming. They also questioned the sites ability to support local services as there is a lack of these locally. There were concerns over the impact on sparrows that use the hedgerow for nesting and some questioned how many young people located in the village actually need homes in the village. There were also issues over the impact on some historic buildings close to the site. There were also objections about the number of houses allocated and agricultural land being used for development.

One member of the public suggested that the focus of development should be on the regeneration of Lowestoft.

One member of the public suggested using an alternative area further west along Chapel Road which they see as more suitable for reasons such as it being outside of the AONB, having links to the main sewer network, landscaping opportunities, safer access from Chapel Road and a better relationship to the existing settlement.

How these comments were taken into account in the Final Draft Local Plan

The policy has been amended to include the provision of off-street parking similar to that for other dwellings in the surrounding area.

The supporting text has been amended to included reference to the sites proximity to the AONB. This will have to be considered under the Landscape Character policy included in the Local Plan which should help mitigate any negative effects of development on the character of the area as well as the policy requiring the protection of established hedgerows and the need for landscaping.

The Local Plan is a strategic document that must account for the needs of the whole District. While the majority of the new development will be focused on Lowestoft, more development has been allocated to the rural areas than in previous Local Plans to help support the continued viability of rural settlements and stem the reduction in population. The distribution of this development has been based on the settlement hierarchy based on factors such as access to services. This means that smaller villages such as Mutford have been allocated development that is considered to be appropriate based on these factors which is the same for all of the other smaller villages. Spreading development in an appropriate manner reduces the likelihood of stretching services and infrastructure beyond their capability in each village and enhances their sustainability.

The addition of 6 extra homes will have a negligible impact on traffic within the village.
Land further west along Chapel Road was investigated however was not taken any further due to the land being relatively isolated from the main built up area. Also, this site is already outside of the AONB and so should not impact on the areas character through the Landscape Character policy.

Mutford Alternative Sites

088 Land on Hulver Road, Mutford

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

Wellington Construction Ltd supported the inclusion of this site stating that it provides an opportunity for self build projects.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan

These comments have been considered however the site is still considered to be poorly related to the rest of the built settlement and so was not taken forward.

131 Orchard Farm Rear Field, New Road, Barnby

Statutory Consultees

No comments submitted in response to this site.
Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

Ringsfield Strategy and Site Allocations

Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
Ringsfield and Weston Parish Council stated that residents objected to the scale of development being proposed as they wish to retain the rural identity of the area. It was also stated that any in-fill development along Cromwell Road would require improvements to pedestrian access.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.
Members of the Public

One member of the public stated that the school could not accommodate more students and that the nearby roads are unsafe due to them being national speed limit.

How these comments were taken into account in the Final Draft Local Plan

The scale of this development has been reconsidered and reduced to 30 dwellings, which is considered more appropriate scale for this rural location.

While the school is near capacity, consultations with Suffolk County Council have shown that it is able to expand to accommodate the pupils. The issues with the road and especially parking outside of the school during peak hours have also been considered with the policy now including the need for a car park to help mitigate these issues.

WLP7.17 - Land North of School Road, Ringsfield

Statutory Consultees

Suffolk County Council stated that the footpath should be extended along the site frontage and that there is no discharge strategy evident.

Parish and Town Councils

Ringsfield and Weston Parish Council stated that residents accepted that some development must take place however objected to the scale of the development proposed. This is because School Road is too narrow to accommodate additional traffic, there are already issues with speeding, there is a minimal bus service currently running in the area and the site is a long distance from employment opportunities. There could also be issues with drainage and water pressure, pavements are not suitable and the school is at capacity. The development could also have a negative impact on the neighbouring woodland. It has been accepted that some housing is needed to support older residents downsizing. It was added that Ringsfield and Weston wish to retain their rural characters.

Other Organisations

The Suffolk Preservation Society objected to the scale of the proposed development stating it would be difficult to mitigate the impacts. They added that the site should more closely follow the current form of the development.
Developers/Landowners

The landowners of the site supported its inclusion stating that it will help support local services and local housing needs and is well connected to the village. They acknowledged that the school will need expanding.

Members of the Public

Members of the public generally objected to this site however it was accepted in some cases that some development should take place. Members of the public stated that the scale of development is too large in relation to the size of the village and could detrimentally impact upon its character. Some believed that the current housing density has been overestimated. It was also stated that the local pedestrian and road network could not accommodate the development proposed, especially during school pick up/drop off times, and that the 30 mph limit should be extended. Added to this, there were concerns over noise and air pollution increasing and there have already been issues with speeding and road damage from heavy vehicles. It was stated that the village has a lack of services, including healthcare, police and education provision. Members of the public also raised concerns over the current state of drainage and sewerage in the area especially in regards to the clay soil of the area. Some had concerns that the development could damage the linear character of the area and acknowledged the need for screening and planting with any development. There are also concerns over the effects on local wildlife.

One member of the public stated that there is little demand for new housing in the area. It was also stated that the regular bus service has been overestimated, the village hall is in need of refurbishment and there are too few jobs in the local area to support development. It was also questioned why there is no insistence on new service provision within the policy and how a footpath to the hall can be promoted as the proposed area for it is private land. The requirement for a tree and hedgerow planting scheme was also questioned as this would take up land and concentrate the houses in a smaller area.

Members of the public stated that any development should be low rise buildings or bungalows. Some members of the public also stated that the recent planning permission for holiday lodges in the area and their potential effects should be considered along with this allocation as well as the potential effects of the Beccles Southern Relief Road. One member of the public suggested running the access to the site to the north and east along the boundary of the playing field as this would take traffic away from School Road. Another member of the public stated that land on Cromwell Road, Church Road and Redisham Road would be preferable to this site. One member of the public suggested turning the site into a wild flower meadow.

How these comments were taken into account in the Final Draft Local Plan
The allocation has been reduced to 30 dwellings which is considered to be a more appropriate scale for this rural area and allows for the provision of a car park to be provided on site to help mitigate the issues related to parents parking on the road during school drop-off/pick-up times.

The landscaping scheme included in the policy should help mitigate any potential effects on the development on the surrounding countryside. Also, reducing the number of dwellings on the site should help maintain the rural character of the area.

The policy already states that the site should include a mix of house sizes and tenures, however this is not specified in order to have some flexibility and not limit the viability of the site.

Reference to the footpath through the woodland has been removed from the supporting.

The Policy has been amended to require the provision of a footpath along the north of School Road.

The Local Plan includes policies and allocations for employment development that will help support residential development across the District.

The alternative sites for Ringsfield were considered however were not taken forward due to the reasons already outlined in the First Draft Local Plan, namely their poor relationship with the current built up area.

Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

Issues relating to access will be considered during the planning application process. There is no evidence to suggest that safe access cannot be achieved to this site.

Transport modelling in the Waveney Local Plan: Suffolk County Transport Model (SCTM) - Preferred Option Traffic Forecasting Report (2018) does not identify any congestion issues in the vicinity of this site.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.

Ringsfield Alternative sites

010 Cromwell Road, Ringsfield and Weston

Statutory Consultees

No comments submitted in response to this site.
Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
Some members of the public supported this site being reconsidered stating it would have a more limited impact on the settlement and agriculture.

One member of the public did not support any of the alternative sites within Ringsfield. It was stated that the village does not have suitable infrastructure to accommodate development, traffic issues would be exacerbated and there were concerns over potential flooding in the area.

How these comments were taken into account in the Final Draft Local Plan
After reviewing these comments, this site was not taken forward as it is still considered to not be well related to the built up area of the settlement and is therefore not considered to be suitable for development.

011 Cromwell Road, Ringsfield, Beccles Opposite 1 Rose Villa

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

Some members of the public supported this site being reconsidered stating it would have a more limited impact on the settlement and agriculture.

One member of the public did not support any of the alternative sites within Ringsfield. It was stated that the village does not have suitable infrastructure to accommodate development, traffic issues would be exacerbated and there were concerns over potential flooding in the area.

How these comments were taken into account in the Final Draft Local Plan

After reviewing these comments, this site was not taken forward as it is still considered to not be well related to the built up area of the settlement and is therefore not considered to be suitable for development.

199 Land south of King’s Lane, Weston

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.
Developers/Landowners

No comments submitted in response to this site.

Members of the Public

One member of the public supported this site being reconsidered as it is currently used to store caravans and would be better suited to supply housing for young families and residents. It was added that it is already close to some affordable homes and could help improve their values.

How these comments were taken into account in the Final Draft Local Plan

After reviewing these comments, this site was not taken forward as it is still considered to not be well related to the built up area of the settlement and is therefore not considered to be suitable for development.

211 East of Cromwell Road, Ringsfield

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

Members of the public supported this site being reconsidered stating it would have a more limited impact on the settlement and agriculture.
One member of the public did not support any of the alternative sites within Ringsfield. It was stated that the village does not have suitable infrastructure to accommodate development, traffic issues would be exacerbated and there were concerns over potential flooding in the area.

How these comments were taken into account in the Final Draft Local Plan
After reviewing these comments, this site was not taken forward as it is still considered to not be well related to the built up area of the settlement and is therefore not considered to be suitable for development.

Rumburgh Strategy and Site Allocations
Statutory Consultees
No comments were made in response to this section/policy.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
No comments were made in response to this section/policy.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

WLP7.18 - Land Adjacent Mill Bungalow, Rumburgh
Statutory Consultees
The Environment Agency supported the protection of existing hedgerows and trees.
Suffolk County Council stated that developing this site would represent further infill of the Rumburgh Common which is detrimental to the historic form and character of the settlement. The layout and scale of housing should be constant with the historic infill to date rather than following a contemporary suburban style. It was added that footways should be provided on the site frontages and there are flood risks along the site edges.

Parish and Town Councils

Rumburgh Parish Council objected to this site over the lack of water pressure in the area around this allocation as well as the lack of sewerage infrastructure, risk of increased run-off and the threat of further degradation to the water network. They also raised concerns over increased traffic, the lack of services and employment and the scale of the development. They added that the development is disproportionate and should more closely follow the allocation set out in the 1987 Local Plan for 4 or 5 dwellings.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The landowner of this allocation supported its inclusion and confirmed its immediate availability. They stated that the southern boundary should be moved further south to include the derelict property and garden and that the allocation should be increased to 14 dwellings to bring it to 10 dwellings per hectare.

Members of the Public

Members of the public objected to this site. Members of the public stated that there is limited service provision in the local area and this would necessitate the need for private car travel, therefore increasing local traffic. It was also stated that the local public house does not need new development to survive. One member of the public stated that this site had been put forward previously but had never come to fruition. It was also stated that the site has overhead electricity wires that could be dangerous to new residents. It was stated that the primary frontage of the site is on Mill Road which is predominantly detached housing and that this should be followed if the site was developed, adding that smaller units could be developed at the rear of the site if needed. One member of the public commented that box style housing and suburbanisation is not needed in the area and that the area needs more social housing.

How these comments were taken into account in the Final Draft Local Plan
The policy has been amended so footways will be provided along the site frontages. The sustainability appraisal of the site has also been amended to acknowledge the flood risk along the edges of the site.

The Council considers this site to be the best option for development in Rumburgh as it fits with the current settlement form and has been put forward in previous Local Plans. The policy has been amended so that the frontages of any development on site with have to follow The Street and Mill Road which is more in line with the current built up area. The proposal set out in the 1987 Local Plan was also considered however this plan was not considered to be consistent with the current built form of the area.

Essex and Suffolk Water were contacted about the water issues raised in Rumburgh and responded saying that there are currently no issues with the water supply in the local area. Discussions have been held with other infrastructure providers to ensure any necessary infrastructure improvements or changes to support the development are included in the Infrastructure Study which supports the Local Plan.

Willingham (Shadingfield and Willingham St Mary) Strategy and Site Allocations

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

The Sotterley Estate supported this strategy stating that the land is available for development and the allocations could help support local services. They added that the number of dwellings developed on these sites should be determined through a neighbourhood plan.
Members of the Public

One member of the public objected to this strategy stating that Willingham and Shadingfield do not have the facilities and services, including sewerage, buses and electricity, to accommodate the new development. It was questioned where the jobs to support this development would come from.

Members of the public stated that, with the proposed Beccles developments, the doctors surgery would not be able to accommodate the additional population. One member of the public stated that there is already low water pressure in the area, the water network is corroded and that overhead wires are old and overloaded. They also expressed concern over the potential impact on local character which has been an issue with some recent planning applications involving extensions. Other concerns surrounded the poor transport links, increased traffic, effects on local wildlife, low educational attainment and school capacities. Design quality is in need of improvement and any scheme should include protection for wildlife and biodiversity.

How these comments were taken into account in the Final Draft Local Plan

The level of development within Willingham (Shadingfield and Willingham St Mary) has been reduced through the removal of WLP7.20. It is agreed that the size of the village, together with the level of service provision means it is inappropriate to allocate such a high level of development to the village.

WLP7.19 - Land East of Woodfield Close, Willingham

Statutory Consultees

South Norfolk District Council stated that this site should be considered for 11 dwellings to generate an affordable housing obligation.

Suffolk County Council stated that the footway should be extended along Sotterley Road.

Parish and Town Councils

Shadingfield, Sotterley, Willingham and Ellough Parish Council stated that they believed the allocation to be broadly acceptable. They raised concerns over the potential increase in traffic but appreciated that final designs would be decided at a later stage, adding that they wish to see a greater mix of housing in the area.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The Sotterley Estate supported this allocation and the site specific criteria. They added that the site is available and deliverable.

Members of the Public

Members of the public objected to this site stating that the current road network can not accommodate additional traffic and pollution. Members of the public specifically mentioned Woodfield Close as being too narrow and housing a historic building. Another member of the public specifically mentioned the Sotterley Road/London Road junction whilst others mentioned that some areas do not have street lights and only partial footpaths. Members of the public also stated that there are not enough local facilities and services, such as broadband, water pressure, healthcare and employment to accommodate any additional population. This would increase the need for car travel and therefore increase the traffic issues. There were also concerns raised over the size of the allocation and the potential impact on the character of the village, especially on buildings such as White Crossbow Cottage, as well as the privacy of existing dwellings. There were also concerns over drainage issues on the site and the impact on local wildlife and hedgerows related to this as the area is often waterlogged and provides a valuable buffer and corridor for many species. The use of green belt and agricultural land for development and how this can be justified when more appropriate sites are located elsewhere such as in Brampton was also raised as an issue. One member of the public was concerned that development could encroach on some private land and that the construction of the area would be a nuisance to locals.

One member of the public suggested the development of housing along Mill Lane as it has better access to facilities and would be more in keeping with the current character of the area. Another member of the public stated there are more appropriate sites located elsewhere such as the football field which is rarely used.

How these comments were taken into account in the Final Draft Local Plan

The Council believes that the site is too small to be increased to 11 dwellings to bring an affordable housing requirement.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.
The policy already includes a need for a mix of housing. The Councils considers that this development should not have a detrimental impact on the local character of the area as the policy states that dwellings should have similar footprints to those found in the local area and that landscaping will be required. Wildlife, biodiversity and design will also be determined through their relevant policies elsewhere in the Local Plan.

The Local Plan is a strategic document that must account for the needs of the whole District. More development has been allocated to the rural areas than in previous Local Plans and the distributions has been based on the settlement hierarchy based on factors such as access to services. This means that smaller villages such as Willingham and Shadingfield have been allocated development that is considered to be appropriate based on these factors which is the same for all of the other smaller villages. Spreading development in an appropriate manner reduces the likelihood of stretching services and infrastructure beyond their capability in each village and enhances their sustainability.

Land around the Mill Lane area was not taken forward in the Plan as it is considered to not be well related to the existing built up area of the village. The football pitch was not taken forward as it is a vital area of open space for recreation in the village and should be protected.

**WLP7.20 - Land North of Sotterley Road, Willingham**

**Statutory Consultees**

Suffolk County Council stated that the footway along Sotterley Road should be extended and there is no drainage strategy evident.

**Parish and Town Councils**

Shadingfield, Sotterley, Willingham and Ellough Parish Council stated that they believed the allocation to be disproportionate to the size of the village. They raised concerns over the potential increase in traffic but appreciated that final designs would be decided at a later stage, adding that they wish to see a greater mix of housing in the area.

**Other Organisations**

The Suffolk Preservation Society objected to this site stating that it is disproportionate and poorly related to the settlement and the effects of developing this area would be difficult to mitigate.
Developers/Landowners

The Sotterley Estate supported this allocation and the variations made by the Council. They added that the site remains available for development.

Members of the Public

Members of the public objected to this site stating that the current road network cannot accommodate additional traffic as it is already dangerous for pedestrians and horse riders especially considering that there are no street lights in some areas and limited footpaths. Members of the public also stated that many services and facilities are not within walking distance and would necessitate the need for private car transport, adding to local traffic issues. It was added that additional development would overload the already poor broadband network. Concerns were raised over drainage issues that are already prevalent in the area and could be exacerbated by development. Members of the public also raised concerns over the impact on their privacy and the rural nature of the settlement and that the construction traffic associated with any development would cause serious disruption to the local area. One member of the public stated that this site would have a negative impact on the adjacent homes. The site also has an old oak tree which should not be removed and it was stated that there is already a community feel in the area so new development is not needed to create one.

One member of the public suggested that houses be built on Mill Lane as this area has a suitable road and is more in keeping with the historic character of the village. They also raised concerns over the destruction of hedgerows and other habitats.

How these comments were taken into account in the Final Draft Local Plan.

After considering the comments submitted for this site, the Council has concluded that this site is not appropriate for development in this area due to its size and likely impact on the local character. The site has been removed from the Final Draft Local Plan.

Willingham (Shadingfield and Willingham St Mary) Alternative Sites

059 Land east of Chartres Piece, Willingham

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan

No comments submitted.

068 Land North of Chartres Piece, Willingham

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan

No comments submitted.
094 Land on the west side of London Road, Willingham - Shadingfield

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
The Sotterley Estate supported this sites exclusion from the Local Plan stating that developing this site would lead to coalescence, would be exposed to the landscape and would impact upon nearby listed buildings.

Members of the Public
Members of the public supported this site being reconsidered as it would have a more limited impact on the existing dwellings and would have more suitable access for development. This site would also be more sympathetic to the historic character of the settlement and would have a reduced impact on hedgerows and habitats.

How these comments were taken into account in the Final Draft Local Plan
The Council agrees with the conclusions drawn by the Sotterley Estate and did not take this site forward for development as it would lead to a reduction in open space between Willingham St. Mary and Shadingfield.

101 Land south of Hill Cottages, Shadingfield

Statutory Consultees
No comments submitted in response to this site.
Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

134 Playing Field, Off A145 London Road, Willingham

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.
How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

Site 68 with 134 Land North of Chartres Piece Piece, Willingham / Playing Field, Off A145 London Road, Willingham

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

Westhall Strategy and Site Allocations

Statutory Consultees
No comments were made in response to this section/policy.
Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
One member of the public objected to this strategy. It was stated that the community facilities listed in the document are not guaranteed to remain open and that the public house has not been operational for some time. Concerns were raised over the potential increase in traffic, especially in regards to walkers and horse riders and issues surrounding water and sewerage services not being able to accommodate development.

One member of the public stated that broadband speeds are slow.

How these comments were taken into account in the Final Draft Local Plan
The comments relating to the community facilities located in the village have been recognised and the supporting text now states that the public house is currently closed and for sale. As the village shop is currently open, it is still listed as a community facility.

WLP7.21 - Land West of Lock’s Road, Westhall

Statutory Consultees
Suffolk County Council stated that no drainage strategy is evident and that the site should link in to existing footways and the recreation ground.

Parish and Town Councils
Westhall Parish Council supported the inclusion of this site providing that infrastructure constraints are suitably mitigated. These include issues with drainage, water pressure, telephone coverage, broadband and road network capacity especially at the Nollers Lane/A143 junction.
Other Organisations

No comments submitted in response to this site.

Developers/Landowners

The landowners of this allocation supported its inclusion stating that it could help meet the housing needs of the local community, deliver Community Infrastructure Levy payments for the improvement of infrastructure and could help improve the surveillance of the recreation ground. They added that all of the land is available for development.

Members of the public

Members of the public objected to this site. Some members of the public who are trustees of the charity that runs the village hall, recreation ground and playing field stated that they have not been consulted on this allocation. They added that they do not agree to providing access from the site to the playing field, over concerns that this could increase the occurrence of dog walkers, or any potential changes to the hedgerows. Another member of the public stated that this site is not sympathetic to the village’s currently linear character and that it should be removed. Wangford Road was suggested as an area more in keeping with this character. Concerns were also raised over issues regarding drainage especially around Locks Road and on the impacts on local wildlife. The potential impact from increased traffic related to both the construction of the development and the eventual increase in residents was also raised.

It was stated that smaller sites have been earmarked in the past that would have a smaller impact, the public house is currently vacant, the shop is likely to close, local schools are overcrowded, and development could lead to further building later on. It was also suggested that picket fences facing the site should be replaced at the developers’ expense if development takes place. Another member of the public stated that the village does not have the infrastructure to accommodate the proposed development especially in regards to broadband speeds and drainage.

How these comments were taken into account in the Final Draft Local Plan

Following the consultation and further work on the allocations across the District, the Council has increased the density of the housing on site to provide 18 homes to ensure the viability and deliverability of the site.

In terms of concerns about infrastructure provision, the Local Plan is supported by an Infrastructure Study which identifies all improvements to infrastructure required to support development. Developers will help fund these improvements in line with Policy WLP1.4 of the Local Plan.
Issues of surface water will be resolved during the planning application process in line with Policy WLP8.24 on Flood Risk.

The reference to providing access to the playing field from the site has been removed.

Sites further along Wangford Road were not explored as there is no evidence they are available for development.

The comments relating to the community facilities located in the village have been recognised and the supporting text now states that the public house is currently closed and for sale. As the village shop is currently open, it is still listed as a community facility. The increase in the size of the site and the subsequent increase in the number of allocated dwellings should also help support local services.

**Westhall Alternative Sites**

**123 Lock’s Road, Westhall**

**Statutory Consultees**

No comments submitted in response to this site.

**Parish and Town Councils**

No comments submitted in response to this site.

**Other Organisations**

No comments submitted in response to this site.

**Developers/Landowners**

No comments submitted in response to this site.

**Members of the Public**

No comments submitted in response to this site.

**How these comments were taken into account in the Final Draft Local Plan**

No comments submitted.
Wissett Strategy

Statutory Consultees

No comments were made in response to this section/policy..

Parish and Town Councils

No comments were made in response to this section/policy..

Other Organisations

No comments were made in response to this section/policy..

Developers/Landowners

No comments were made in response to this section/policy..

Members of the Public

No comments were made in response to this section/policy..

How these comments were taken into account in the Final Draft Local Plan

No comments submitted.

Wissett Alternative Sites

104 Land south of The Street, Wissett

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.
Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

173 Street Field, Mill Road, Wissett

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.
200 Corner of Rumburgh Road and Chediston Street, Wissett

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.

Developers/Landowners
No comments submitted in response to this site.

Members of the Public
No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

201 Land opposite Box Farm, Wissett

Statutory Consultees
No comments submitted in response to this site.

Parish and Town Councils
No comments submitted in response to this site.

Other Organisations
No comments submitted in response to this site.
Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

217 Lodge Lane, Wissett

Statutory Consultees

No comments submitted in response to this site.

Parish and Town Councils

No comments submitted in response to this site.

Other Organisations

No comments submitted in response to this site.

Developers/Landowners

No comments submitted in response to this site.

Members of the Public

No comments submitted in response to this site.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.
Alternative Sites – Countryside settlements and villages

019 Halesworth Road, Redisham

Developers/Landowners

The owner thinks this location is ideal and should be reconsidered for development.

How these comments were taken into account in the Final Draft Local Plan
Having considered all the comments on the strategy and the sites, the Council remains of the view that the Local Plan should not positively allocate sites in the Countryside for development. Sites in these areas can be considered under Policies WLP8.6 on Affordable Housing in the Countryside, and WLP8.7 on Small-Scale Development in the Countryside. Neighbourhood Plans could also consider sites in these areas for allocation.

091 Land on the junction of St Olaves Road / Sluggs Lane, Herringfleet, Lowestoft

Members of the Public

One member of the public supported this site stating that some development could deliver suitable road and pedestrian/cycle access to the green and school via allotments.

How these comments were taken into account in the Final Draft Local Plan
Having considered all the comments on the strategy and the sites, the Council remains of the view that the Local Plan should not positively allocate sites in the Countryside for development. Sites in these areas can be considered under Policies WLP8.6 on Affordable Housing in the Countryside, and WLP8.7 on Small-Scale Development in the Countryside. Neighbourhood Plans could also consider sites in these areas for allocation.
143 St James Lane, St James, South Elmham

Developers/Landowners

The owner recommends the site with a mixture of house types as it would form part of St James and provide housing for those working in nearby towns.

How these comments were taken into account in the Final Draft Local Plan

Having considered all the comments on the strategy and the sites, the Council remains of the view that the Local Plan should not positively allocate sites in the Countryside for development. Sites in these areas can be considered under Policies WLP8.6 on Affordable Housing in the Countryside, and WLP8.7 on Small-Scale Development in the Countryside. Neighbourhood Plans could also consider sites in these areas for allocation.

150 St James Lane, St James, South Elmham

Developers/Landowners

The owner recommends the site with a small number of houses as it would form part of St James and development would normalise the lay-out of the village.

How these comments were taken into account in the Final Draft Local Plan

Having considered all the comments on the strategy and the sites, the Council remains of the view that the Local Plan should not positively allocate sites in the Countryside for development. Sites in these areas can be considered under Policies WLP8.6 on Affordable Housing in the Countryside, and WLP8.7 on Small-Scale Development in the Countryside. Neighbourhood Plans could also consider sites in these areas for allocation.

191 The Geranium Plot, Mariawood, Hulver Street

Developers/Landowners

The landowners of this site support this site being reconsidered for approximately 7 dwellings. They state that the area has some valuable services and facilities locally including a village hall and a bus service to Beccles, as well as a church, school, Hundred River Maze, an equestrian club and a pet shop when combined with Henstead and the opportunity to support services in Beccles. They added that the site also has the advantage of being Brownfield land, not being in a flood risk area and has good drainage infrastructure already in place. They stated that a safer access has been partially implemented and that it could improve the area by redeveloping run down buildings within the AONB if there is a good design and landscaping scheme. This includes considering the impact on the Old Rectory. They stated that previous analysis of the site did not identify any significant constraints.
or any that could not be mitigated and could help Hulver Street and Henstead become more sustainable.

How these comments were taken into account in the Final Draft Local Plan
Having considered all the comments on the strategy and the sites, the Council remains of the view that the Local Plan should not positively allocate sites in the Countryside for development. Sites in these areas can be considered under Policies WLP.8.6 on Affordable Housing in the Countryside, and WLP.8.7 on Small-Scale Development in the Countryside. Neighbourhood Plans could also consider sites in these areas for allocation.

Housing

Statutory Consultees
South Norfolk Council is pleased Waveney is meeting its objectively assessed need and the overall strategy for housing growth.

The Broads Authority queried whether the objectively assessed need in includes or excludes the Broads.

Parish and Town Councils
No comments were made in response to this section/policy.

Other Organisations
No comments were made in response to this section/policy.

Developers/Landowners
No comments were made in response to this section/policy.

Members of the Public
Members of the public have commented that –
- Buy-to-let landlords and 2nd home owners are considered to be pricing locals out of the housing market.
- More social housing is requested across the district.
- Too much housing is proposed.
- The housing is incorrectly proposed on greenfields.
Recently built houses have been of poor design.

There were queries regarding whether Brexit has been taken in account in the Strategic Housing Market Assessment, and what provision is being made for NHS services.

How these comments have been taken into account in the Final Draft Local Plan

The objectively assessed housing need for Waveney includes the portion of the Broads Authority’s objectively assessed need in Waveney. There are a number of references to this throughout the plan.

The strategic housing market assessment has taken account of the 2nd homes and properties for rent in calculating the housing needs for the district. The local plan cannot address the number of buy to let or 2nd homes in the district – this is a function of the housing market. Neighbourhood Plans can consider policies for primary residence restrictions where local evidence supports this.

Policy WLP8.2 ‘Affordable Housing and Starter Homes’ will deliver Affordable Homes as part of new developments. Policy WLP8.6 ‘Affordable Housing in the Countryside’ allows Affordable Housing to be built in countryside locations (subject to criteria).

The local plan promotes high quality design and Policy WLP8.29 ‘Design Quality’ deals with the issue of design of new development including housing.

There is insufficient brownfield land to meet housing demand and therefore some greenfield sites are required. The levels of housing growth in the first draft Local Plan are considered to be vital to meet housing need and deliver development in a planned fashion which will minimise the uptake of greenfield sites.

The impact of Brexit on the future population is extremely uncertain. There is no evidence to suggest that Brexit will have any effect on inward migration into the District or change in household sizes. Most net inward migration into the District is a result of internal migration.

Policy WLP8.1 Housing Mix

Statutory Consultees

South Norfolk District Council supports the policy.
Parish and Town Councils

Southwold Town Council state the policy should include that Neighbourhood Plans can consider principle residence restrictions on a new-build and the range of tenure should be defined to include occupation by principle residents only.

Bungay Town Council note housing should be mixed and environmentally fit for its lifetime.

Reydon Parish Council strongly supports the policy. In Southwold and Reydon the parish council would additional like 30% of dwellings to be 2 or 3 bedroom properties to discourage “executive style developments.

Other Organisations

Bungay Neighbourhood Development Plan Steering Group notes the need for a mix of houses.

Orwell Housing Association, Saffron Housing Trust, Orbit Homes, Hastoe Housing Association and the Flagship Group all support paragraph 8.5 and the need for smaller units.

Southwold and Reydon Society strongly support the policy. In Southwold and Reydon the society would additional like 30% of dwellings to be 2 or 3 bedroom properties to discourage “executive style developments.

The Halesworth and Blyth Valley Partnership strongly support the policy in Halesworth but are concerned that under developer pressure the application of the policy will be diluted at Planning Committee.

Developers/Landowners

Hopkins Homes objected to the requirement for 35% of new homes to be 1 or 2 bedroom properties as too prescriptive because needs vary across the district.

Badger Building note the fixed costs for 1 and 2 bedroom properties are the same as those for larger properties. Badger Building claim the increase in smaller properties will reduce land values which may affect the delivery of the site or of affordable housing on the site. Badger Building also claim the requirement for M4(2) compliance will increase costs and be difficult to achieve in smaller properties.

Richborough Estates Ltd consider the degree of flexibility noted in paragraph 8.6 of the support text should be included in the policy wording.
Benacre Estate is concerned about the requirement for 35% of developments to be 1 or 2 bedroom properties and the implication that this is in addition to the affordable homes requirement. Benacre Estate believes this will not realistic and would affect the viability of smaller schemes, such as those in Wrentham. Further guidance is requested regarding whether policy WLP8.1 and WLP8.2 are to be considered in conjunction or separate. Benacre Estate support the M4(2) requirement.

Somerleyton Estate objects to the policy and request that Neighbourhood Plans or Supplementary Planning Documents set out the house type and mix to reflect the local area.

Ingleton Wood LLP wants greater flexibility. 35% 1 and 2 bedrooms should be sought unless the developer can provide evidence to support an alternative mix.

Gladman consider it unreasonable to apply a housing mix to the life time of the plan period and housing mix should be determined by current market conditions to ensure viability. Gladman raise concerns about requirements for technical standards for new houses.

The Home Builders Federation considers there is insufficient evidence to support the policy.

**Members of the Public**

There is support received for the policy. Members of the public consider there are too many ‘executive’ style 3 & 4 bedroom properties and not enough smaller properties and bungalows for young people to buy and for the elderly to downsize.

Objection to the policy was on the grounds that the market should determine housing mix for Market Housing.

An objector cited the lack of clarity and lack of policy for tandem or infill development. The previous policy was considered to be stronger and clears.

**How these comments have been taken into account in the Final Draft Local Plan**

Neighbourhood Plans in Reydon and Southwold can set out a more detailed policy for housing type and mix which reflects local needs and evidence. Neighbourhood Plans can also apply design guidance to address design issues.

Major residential schemes are required to submit a sustainability statement which will demonstrate how the development has incorporated sustainable construction methods.

Neighbourhood Plans can consider planning policies for principal residence restrictions where evidence supports this. This is not a matter addressed through strategic policy in the local plan and therefore it is not necessary to address this specifically in the wording of the policy.
The policy wording states “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.” This is considered to include sufficient flexibility for the implementation of the policy.

The Local Plan now includes guidance for the reparation of viability assessments in Appendix 5. The 35% requirement for smaller properties has been factored into the Whole Plan Viability Assessment which supports this plan and the requirements within it.

Housing mix is considered a strategic issue therefore it is important that the Local Plan sets out requirements. The Policy does provide some flexibility for Neighbourhood Plans to take a more detailed approach if supported by evidence.

Policy WLP8.2 Affordable Housing

Statutory Consultees

South Norfolk District Council note the need for viability assessment of the plan and Waveney should qualify the requirement for Starter Homes in case the Government does not produce adequate guidance to define them precisely. SNDC queries whether the words ‘where practicable’ are precise enough to enforce the policy on sheltered and extra care housing.

The Broads Authority note affordable housing should be provided.

Parish and Town Councils

Southwold Town Council highlights the loss of affordable dwellings since the 1970s and request that Neighbourhood Plans be able to make provision for local circumstances.

Reydon Parish Council strongly support the policy. If the provision on smaller sites is commuted, the cash sum should represent the full cost of developing affordable housing elsewhere. They request a local level viability assessment and higher than 35% affordable housing for Reydon if viable. They request that every step is taken to ensure homes retain their relevant affordable status and flexibility to increase the proportion of shared ownership.

Other Organisations

Orwell Housing Association, Saffron Housing Trust, Orbit Homes, Hastoe Housing Association and the Flagship Group all -
- Support the provision of 35% affordable housing but of these 70% (not 50%) should afford affordable rent.
- They recommend that the policy wording includes the caveat, “These targets will be monitored and may be modified to take into account up to date housing information through the plan period.”
- They are concerned with the wording “Sheltered and extra-care housing should be included as affordable units where practicable”.
- There is no funding for new sheltered housing scheme and any support is linked to an individual not a property.
- They recommend the need is addressed through affordable accommodation built to adequate standards.
- The title of the policy should be changed to “Affordable Housing including homes for rent and low cost home ownership”.
- Refer to starter homes should be deleted as the government has not produced any guidance on this and there is no guarantee that lenders will offer mortgages.
- They recommend a generic term such as low cost home ownership to cover shared equity, discounted market sale, rent to buy and starter homes.

Beccles Society is concerned affordable rented properties will be occupied by people outside Beccles who don’t contribute to the local economy in a positive way. The number of care home units/sheltered dwellings should count towards the housing number allocated for Beccles and not exceeded. More than 20% of affordable houses should be starter homes. Market Housing should be a mix of detached, semi-detached and terraced properties.

Southwold and Reydon Society strongly support the policy. If the provision on smaller sites is commuted, the cash sum should represent the full cost of developing Affordable Housing elsewhere. They requests a local level viability assessment and higher than 35% Affordable Housing for Reydon if viable. They request that every step is taken to ensure homes retain their relevant affordable status and flexibility to increase the proportion of shared ownership.

The Halesworth and Blyth Valley Partnership strongly support the policy in Halesworth but are concerned that under developer pressure the application of the policy will be diluted at Planning Committee.

Rentplus has supplied details of their scheme. They note the SHMA has not considered other models and tenures such as rent to buy. They disagree with the 20% requirement for starter homes and recommend this is changed to 10% for home ownership models. The policy should refer to the mix of types as indicative to be negotiated.
Developers/Landowners

Badger Building request clarification/definition of the housing types in the policy.

Richborough Estates consider the policy over-prescriptive, endangers deliverability, and needs to be more flexible.

Benacre Estates support the policy including the 35% affordable housing target, 11 dwelling threshold, and ratio of types of affordable houses.

Ingleton Wood LLP supports the policy include the mix of types and degree of flexibility.

Gladman consider there is insufficient evidence to support the 35% requirement, the figure predetermined and a range of options should be tested.

The Home Builders Federation notes there is no viability evidence published. They recommend the policy wording is amended to include “where viable”.

Members of the Public

Supporters believe affordable homes should always be delivered on site.

Objectors note that lack of a Viability Assessment and that the assessment should not be done by the Council in isolation but with input from developers. The amount of affordable housing is not considered viable.

There are queries regarding the provision of social housing and whether social housing will be for local people.

Comments include that social housing should not be in the green belt, it should be grouped together and located away from value properties. All privately owned properties for rent should be registered for buyers. Existing home owners should be protected from drug using neighbours and those that don’t maintain their properties.

How these comments have been taken into account in the Final Draft Local Plan

The Whole Plan Viability Assessment has tested a range of scenarios and finds that Southwold and Reydon are able to support 40% of units to be affordable, Lowestoft 20% and the remainder of the district 30% and this has been embodied in the Affordable Housing policy. The impact of the M4(2) optional standard for accessible and adaptable dwellings has also been tested for viability.
The Strategic Housing Market Assessment identifies a tenure split for Affordable Housing for 50% affordable rent, 30% shared ownership, and 20% starter homes in order to meet the Affordable Housing need over the plan period. The Strategic Housing Market Assessment also identifies a significant need for new sheltered accommodation and extra-care housing. Policy WLP8.2 therefore supports these types of affordable housing as part of the affordable housing provision on site where practicable.

The policy is written so that it is supportive of sheltered and extra care housing where these come forward. Such types of housing would not be practical on some of the allocated sites in the Local Plan therefore it is not feasible to impose a blanket requirement. Larger allocations in the Local Plan have a requirement in the policy for care home/nursing home and/or extra care or sheltered housing which would be enforceable.

National Planning Practice Guidance prevents planning obligations such as Affordable Housing from being required on sites of 10 or less therefore the Local Plan can not alter the policy on site size thresholds. The level and tenure of Affordable Housing can be varied where the developer demonstrates this is needed to ensure the site remains viable. This is in accordance with National Planning Policy therefore specific reference in the Affordable Housing policy would duplicate national policy and is not required. The Local Plan allows Neighbourhood Plans to set higher percentages of Affordable Housing where this can be justified.

‘Gateway to Homechoice’, the lettings system for Affordable Housing in the district, gives priority to those with a local connection. Local connection tests and retention of Affordable Housing is addressed through the management of the dwellings and through the Section 106 legal agreement which is part of the planning application process.

The Affordable Housing tenures are the same as defined by the glossary of the NPPF. Rent-to-buy is not currently defined by the NPPF as Affordable Housing and the focus shall therefore remain on tenures referenced in the policy.

The title of the policy has been amended to ‘Affordable Housing’ in recognition of the uncertainty around the future of Starter Homes. Reference to Starter Homes has been retained in the policy as the evidence points to the need to provide them and they have not been removed from the Government’s policies.

Affordable Housing should be indistinguishable from in its appearance from market housing in the interests of creating mixed and balanced communities.
Policy WLP8.3 Self Build and Custom Build

Statutory Consultees

South Norfolk District Council supports the policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Building is concerned about the wording of the policy. For developers to return to a site 12 months after completion to pick up undeveloped lots is not practical. The site should be offered from the outset for sale for 12 months and if not taken up in that time it can be completed by the developer as part of the normal build programme.

Richborough Estates object and claim the policy will affect deliverability.

Gladman Developments notes that the policy should be justified through an assessment of housing needs and reflect local circumstances. Gladman consider the policy wording does not address circumstances that arise on a site by site basis. They recommend the wording is changed from “requiring” to “seeking to encourage”.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

The policy has been amended to allow for the serviced plots to be built out by the developer after being adequately and appropriately marketed for a minimum of 12 months. The 12 months shall start not before the plots are complete and available for development. This increases flexibility for developers of sites where self/custom build plots are required which will enhance deliverability of the whole site.
The policy reflects need over the plan period which is evidenced by the Council’s Self Build Register. The 5% requirement applies only to 100+ dwelling developments which should be capable of delivering 5% serviced plots. If there is no demand on a particular site then they can be built out by the developer as appropriate following 12 months adequate and appropriate marketing.

The Council must plan to provide serviced plots in response to the identified need and self and custom build will help to deliver the objectively assessed need for housing. Therefore the approach taken in the Local Plan is more positive than “seeking to encourage” and the “requirement” for serviced plots on developments of 100+ units will be retained.

**Policy WLP8.4 Conversion of Properties to Flats**

**Statutory Consultees**

No comments were made in response to this section/policy.

**Parish and Town Councils**

No comments were made in response to this section/policy.

**Other Organisations**

No comments were made in response to this section/policy.

**Developers/Landowners**

No comments were made in response to this section/policy.

**Members of the Public**

A member of the public supports the policy.

**How these comments have been taken into account in the Final Draft Local Plan**

No change.
Policy WLP8.5 Gypsy and Traveller Sites

Statutory Consultees

The Environment Agency would support sites away from flood zones 2 and 3.

Suffolk Coast and Heaths Area of Outstanding Natural Beauty request an additional line in the policy requiring “no adverse impact on landscape character and quality”.

The Broads Authority would welcome reference to the landscape character in the policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

A member of the public has no issues with Travelling show people using Belvedere Road, but has experienced problems with illegal encampments.

Concern is expressed that Gypsy and Traveller communities may not abide by planning system or law and recommend a zero tolerance policy is adopted. It is requested that the Council/Planning Officers monitor sites to ensure compliance with planning permission and living on site is not permitted until appropriate sewerage, waste and other facilities have been installed.

How these comments have been taken into account in the Final Draft Local Plan

The Landscape Character policy addresses the issue of impact on the landscape. The Landscape Character policy would not permit development where it will have an adverse impact on the Area of Outstanding Natural Beauty. This policy is referenced in the supporting text.
This policy will be used to determine planning applications for gypsy and traveller sites. Unauthorised encampments will be dealt with by the appropriate authorities including the Police, Suffolk County Council, and Waveney District Council. Planning enforcement matters such as compliance with planning permission is dealt with by the Council’s Development Management team.
Policy WLP8.6 Affordable Housing in the Countryside

Statutory Consultees

The Broads Authority queries why the policy does not relate to the markets towns and Lowestoft. In bullet point four of the policy, The Broads Authority recommends schemes take into consideration the landscape impact in addition to the setting of the settlement.

Parish and Town Councils

Reydon Parish Council note the policy does not apply to Reydon. However, the parish council considers the policy should apply to Reydon so further sites on boundary could be developed in the future if there is evidence of housing need not being met.

Other Organisations

Southwold and Reydon Society note the policy does not apply to Reydon. However the society considers the policy should apply to Reydon so further sites on boundary could be developed in the future if there is evidence of housing need not being met.

Developers/Landowners

Badger Building, Hastoe Housing Association, Flagship Group, Orbit Home, Saffron Housing Trust and Orwell Housing Association all support the policy.

Members of the Public

There is both support for the policy and the preceding text, and criticism that the policy does not provide examples of what an exception might be.

How these comments have been taken into account in the Final Draft Local Plan

A cross-reference to Policy WLP8.35 on Landscape Character has been added to the supporting text to improve clarity that the landscape will be taken into account.

Extending the policy to include sites adjacent to towns, such as Reydon, has been considered. Significant amounts of land have been identified and allocated in and around the towns. Site allocations for towns meet the overall spatial Strategy of the Local Plan. These town allocations are expected to provide affordable housing in accordance with Policy WLP8.2. Policy WLP8.6 specifically addresses the issues of development in rural areas which differs from the towns. If there is an additional local need for affordable homes in market towns and Reydon, Neighbourhood Plans or
Neighbourhood Development Orders could bring forward additional sites for mixed tenure developments or 100% affordable housing.

Policy WLP8.7 Small Scale Residential Development in the Countryside

Statutory Consultees

The Broads Authority notes the wording of the policy should include landscape impacts as well as setting of the settlement.

South Norfolk District Council supports the policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Building has reservations about the wording of the policy. They recommend the policy relates to a quantity of building permitted on site not three dwellings, as this would support the development of smaller properties. They note that only genuine local community planning concerns should be taken into account.

Gladman Developments Ltd considers the three or five dwelling criteria an arbitrary restriction not adequately justified. There is likely that sustainable development that can be brought forward that exceeds the limits of the policy. There are likely to be opportunities located outside the tightly drawn settlement boundaries but well related to settlements and their services and facilities. While they acknowledge the importance of consultation, they note the Framework does not require the local community to provide support and the policy should reflect this. All views should be considered through a balancing exercise.

Somerleyton Estate objects to the policy particularly the limit of three dwellings and the requirement for there to be existing residential properties on three sides. Somerleyton Estate notes the hamlets and small villages are often linear and can be staggered but still a cohesive, identifiable group. The estate recommends a change in policy wording to “the proposal compliments the form
and layout of development in the settlement” as this would allow planning officers to exercise greater professional judgement.

Sotterley Estate agree with the principle underlying the policy but query the evidence for the criteria for proposals of up to three dwellings and for existing residential properties on three sides of the site. Rather than take a prescriptive approach, individual planning officers should be allowed to exercise greater professional judgement.

Members of the Public

One member of the public largely supports the policy but considers the policy wording should be revised to be more flexible. The supporting text and accompanying diagram is too restrictive, and the strength of local support should not be the only factor in determining applications. One member of the public criticises the policy for not providing examples.

How these comments have been taken into account in the Final Draft Local Plan

Developers and members of the public objected to Figure 35, the associated text and restriction for residential development on three sides of a site. Figure 35 and the associated text have been removed as it is considered it doesn’t help with the clarification of the aims of the Policy. The requirement for residential properties on three sides has been amended to two sides which provide greater flexibility.

A cross-reference to Policy WLP8.35 on Landscape Character has been added to the supporting text to improve clarity that the landscape will be taken into account.

It is not considered necessary to define a “small gap”, remove the limits on the number of dwellings, or change the policy specification from a number of dwellings to area size. The Policy is already considered to be sufficiently positive in that it allows a small amount of development in less sustainable locations where development would not normally be positively considered.

Proposals will have to taken into consideration design policies that require development to respond to local context including scale and layout. The number of houses that can be reasonably accommodated within a given gap will be influenced by the existing local context and housing density. Inappropriate spacing of dwellings to spread out 3 or 5 dwellings in an overly large gap, or cram an excessive number of dwellings into a small gap would fail the requirements of paragraph 3 of policy WLP8.7 and policy WLP8.29.
Policy WLP8.8 Rural Workers Dwellings in the Countryside

Statutory Consultees

The Broads Authority query the wording of the second bullet point in the policy and the lack of mention of the worker’s family. The Broads Authority notes the wording of their own policy may be relevant and of use.

South Norfolk District Council queries the term ‘Registered Local Landlords’ and whether this means ‘Registered Providers’.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public criticises the policy for not providing examples.

How these comments have been taken into account in the Final Draft Local Plan

The policy wording has been amended to replace “Registered Local Landlords” with “Registered Social Landlords or Private Registered Providers”.

It is not considered necessary to specifically reference the rural worker’s family in the policy wording.
Policy WLP8.9 Replacement Dwellings and Extensions in the Countryside

Statutory Consultees

Historic England welcomes the policy particularly that the existing dwelling to be replaced is not a building of architectural or historic value, and that extensions to converted agricultural dwellings should not detract from the original form. Historic England recommends reference to the historic environment in paragraph 8.50.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

Paragraph 8.50 has been amended to include mention of the historic environment.

Policy WLP8.10 Residential Annexes in the Countryside

Statutory Consultees

The Broads Authority notes Waveney District Council may be interested in their equivalent policy called Residential Ancillary Accommodation.

Parish and Town Councils

No comments were made in response to this section/policy.
Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

Amendments and additions have been made to the supporting text and policy wording to provide greater clarify and security against the creation of new dwellings in the Countryside.

Policy WLP8.11 Conversion of Rural Buildings to Residential Use

Statutory Consultees

The Environment Agency notes that where conversion of rural buildings is proposed in flood zone 2 and 3, a site specific flood risk assessment would be required.

Historic England note the best use for a building is the original use, but welcome the aspiration to ensure the heritage assets remain in use and in good repair. Historic England notes the focus on purely convert rural buildings to residential use. Conversion may be required for a building to remain in commercial use. They would welcome further consideration of the policy.

Suffolk County Council notes that the policy could refer back to policy WLP8.35 to draw attention to the requirement for Heritage Asset Assessment.

South Norfolk District Council queries whether the supporting text in paragraph 8.53 preferring the continued use of buildings for commercial purposes to support the rural economy should be reflected in the policy.

Parish and Town Councils

No comments were made in response to this section/policy.
Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Badger Building and Benacre Estates Company support the policy.

Members of the Public

One member of the public criticises the policy for not providing examples.

How these comments have been taken into account in the Final Draft Local Plan

Supportive text added regarding flood risk assessments and attention drawn to other policies in the Local Plan.

Supporting text and policy wording has been added to address the specific design issues relating to the conversion of rural buildings.
Employment

Statutory Consultees

South Norfolk District Council suggested it would be useful to include the date of the Employment Land Needs Assessment in Paragraph 8.56. They supported the flexible and responsive supply of employment land which the policies would provide.

Parish and Town Councils

Southwold Town Council encouraged the consideration of Islington’s Guidance on Affordable Workspace, December 2014. They drew comparisons to Southwold where high land values for residential development give rise to similar problems in London for the supply of affordable business space. They requested that the entire Southwold area is zoned so that change of use from business to residential was restricted.

Other Organisations

No comments were made in response to this policy/section.

Developers/Landowners

No comments were made in response to this policy/section.

Members of the Public

One respondent suggested that the uncertainty with respect to jobs forecasts, raised doubts about the level of housing which was being planned for.

How these comments have been taken into account in the Final Draft Local Plan

The date of the Employment Land Needs Update has been added to the text.

The Islington guidance has been considered and it is agreed that small and medium sized enterprises are important to Southwold and the District’s economy. It is considered that Policies WLP8.12, WLP8.13 and WLP8.14 on employment are sufficient to provide and protect space suitable for these sized businesses. Most new employment space provided in the District already caters for this. Policy WLP8.12 allows for Neighbourhood Plans to identify additional employment premises/areas for protection and the Southwold Neighbourhood Plan is encouraged to consider this.
The Strategic Housing Market Assessment indicates that there will be need for housing irrespective of employment growth.

Policy WLP8.12 – Existing Employment Areas

Statutory Consultees

The Broads Authority questioned whether “(B class uses)” in paragraph 8.62 should state “(non-B-class uses)”.

South Norfolk District Council questioned why commercial properties outside of Existing Employment Areas would be able to convert without a requirement for any kind of marketing to take place.

Parish and Town Councils

Southwold Town Council referenced evidence identifying a need for start-up, micro and small business space. They stated that Southwold Business Centre off St Edmunds Road should be identified as an Existing Employment Area.

Other Organisations

No comments were made in response to this policy/section.

Developers/Landowners

Tim Basey-Fisher stated that the policy was supported by questioned whether it applied to employment sites with planning permission and not just Employment Areas identified on the new Policies Map.

Members of the Public

No comments were made in response to this policy/section.

How these comments have been taken into account in the Final Draft Local Plan

It is considered that protecting all premises outside of Existing Employment Areas to the same degree as those within Existing Employment Areas would be contrary to the National Planning Policy Framework. Existing Employment Areas have been identified based on evidence included in the Existing Employment Areas Review (July 2017 and updated February 2018) and represent those
areas of premises important to the local economy and where it would be desirable to protect them. Premises outside these areas are more likely to be less compatible with surrounding uses.

It is agreed that Southwold Business Centre should be identified as an Existing Employment Area, given it is the only collection of B Class premises in Southwold. The Existing Employment Area Review (July 2017) has been updated to reflect this.

The policy and supporting text have been revised to make clear that the protection applies to new premises constructed during the lifetime of the plan on allocated sites, sites currently with planning permission and sites elsewhere.

Policy WLP8.13 – New Employment Development

Statutory Consultees

South Norfolk District Council was supportive of the approach.

Parish and Town Councils

No comments were made in response to this policy/section.

Other Organisations

The Halesworth and Blyth Valley Partnership supported the policy and stated it was vital to support the planned housing growth in Halesworth.

Developers/Landowners

The Benacree Estates Company supported the policy.

Members of the Public

No comments were made in response to this policy/section.

How these comments have been taken into account in the Final Draft Local Plan

Comments noted. No changes necessary.
Policy WLP8.14 – Conversion and Replacement of Rural Buildings for Employment Use

Statutory Consultees

The Environment Agency stated that rural buildings being converted to employment use should be accompanied by a site specific flood risk assessment when they are located in flood zones 2 and 3.

Historic England stated that the best use for a building is its original use. However, noted that sometimes with commercial buildings the original use is not the optimum viable use to prevent it becoming redundant. They welcomed further consideration of the policy with the historic environment policies to ensure the best outcome for buildings is planned for in Waveney.

Suffolk County Council stated that a reference to policy WLP8.35 to draw attention to the requirement for applications to be supported by appropriate Heritage Asset Assessment should be considered.

Parish and Town Councils

No comments were made in response to this policy/section.

Other Organisations

No comments were made in response to this policy/section.

Developers/Landowners

The Benacre Company was supportive of the Policy and encouraged active steps to be taken to aid generation of employment through the re-use of rural buildings outside of the principal settlement boundaries.

Members of the Public

No comments were made in response to this policy/section.

How these comments have been taken into account in the Final Draft Local Plan

The National Planning Policy Framework and National Planning Practice Guidance clearly states out when a site specific flood risk assessment is required and it is not considered necessary to repeat this in this policy.
Given that many rural buildings in the countryside are heritage assets, it is agreed that cross-reference in the supporting text to the National Planning Policy Framework and the local heritage policies of the Local Plan is added.
Tourism

Statutory Consultees


Parish and Town Councils

Lowestoft Town Council raised the issue of AirBNB and micro letting trends on local hotels and bed and breakfast businesses.

Other Organisations

Bourne Leisure Ltd supported the strategy.

Developers/Landowners

No comments were made in response to this policy/section.

Members of the Public

Members of the public raised concerns over the impact on tourism in the district from: proposed levels of housing the first draft Local Plan; lack of investment of investment in tourist facilities and attractions; loss of the tourist information centre; and loss of the beach at Lowestoft. Members of the public questioned why there was no mention of campsites.

How these comments have been taken into account in the Final Draft Local Plan

Reference to the Broads Plan and Broads Tourism Strategy has been added in to the supporting text.

Lowestoft Town Council’s comments are noted, however, the Local Plan sets out planning policy and is not used to determine what constitutes a material change of use. This is a matter for planning law and will be addressed on a case by case basis via the development management or planning enforcement process. No change.

The levels of housing growth in the first draft Local Plan are considered to be vital to meet housing need and deliver development in a planned fashion which will minimise the impact on the coastline,
landscape, and towns amongst many other tourist attractions in the district. There is no evidence to suggest that new housing will have any negative impact on tourism. The tourism policies in this section of the Local Plan are designed to be supportive of tourism development coming forward. The Coastal Change policies in the draft Local Plan are designed to support the Shoreline Management Plan which sets out how the coastline in the district will be managed.

Policy WLP8.15 provides a positive framework for self-catering accommodation including campsites.

**New Self Catering Tourist Accommodation**

**Statutory Consultees**

The Environment Agency commented that some types of self catering accommodation are vulnerable to flood risk and it should indicate that site owners or managers should register for flood warnings and have flood evacuation plans in place.

The Broads Authority have requested a reference to the Broads in paragraph 8.79.

**Parish and Town Councils**

Lowestoft Town Council supported the provision of cycle storage and wished to see the promotion of bicycle rental options.

**Other Organisations**

No comments were made in response to this policy/section.

**Developers/Landowners**

Bourne Leisure supported provision of on-site commercial, recreational or entertainment facilities on large developments. They recommended the policy should be made more flexible around the application of planning conditions or legal agreements and be applied on a case by case basis.

**Members of the Public**

A member of the public raised concerns about the risk of tourism development taking place on the Dip Farm site between Lowestoft and Corton. They supported for provision of covered cycle storage. One member of the public queried the proximity of the Tingdene North Denes caravan park to bus routes.
How these comments have been taken into account in the Final Draft Local Plan

Support for bicycle rental has been included in the supporting text.

The flood risk policy requires development proposals at risk of flooding to demonstrate through a site specific flood risk assessment that flood risk can be satisfactorily mitigated over the life time of the development. This includes safe access and egress, and an emergency flood plan.

Reference is made to the Broads Plan and Tourism Strategy in the supporting text.

The intention of the policy is to establish a clear, consistent, precise and enforceable method of controlling new self catering tourist accommodation and its loss to full time residential uses. There is a history of planning enforcement issues in the district in this regard and the proposed changes are viewed as making the policy less clear, less precise, and more difficult to enforce. There is flexibility included regarding how site owners may wish to manage the vacation of all or half of their site which will allow the operation of the site all year round. Therefore it is not recommended that the proposed changes are incorporated in to the Final Draft Local Plan.

The policy is intended to be applied to all new self catering tourist accommodation and has not been written to support development of any particular sites, such as the Dip Farm site. Policy WLP8.36 ‘Coalescence of Settlements’ has been written to manage issues in relation to the gap between Lowestoft and Corton.

The Tingdene North Denes Caravan Park is an existing tourist accommodation site – the policy has been written for new and extensions to self catering tourst accommodation.

Include reference in text to extensions to existing self catering tourism accommodation sites.

New Hotels and Guest Houses

Statutory Consultees

South Norfolk District Council commented on the terminology and wording of the policy.

Parish and Town Councils

No comments were made in response to this policy/section.

Other Organisations

No comments were made in response to this policy/section.
Developers/Landowners

Benacre Estates wanted the policy to allow for newly built or conversions to create new hotels in the countryside away from seafront locations.

Members of the Public

No comments were made in response to this policy/section.

How these comments have been taken into account in the Final Draft Local Plan

National planning policy is clear that hotels are town centre uses. Where there is very clear and persuasive evidence of need for a new build country hotel, such a proposal could be judged on its merits via a planning application. A policy which supports new build hotels in countryside locations could risk speculative applications on rural sites which are contrary to the policy direction set out in national planning policy and could be harmful to town centres. Conversion of existing buildings in the countryside to hotel use would need to carefully address issues relating to traffic; access; landscape impact; signage; and amenity to name a few. Such a proposal could achieve heritage objectives where the buildings are of heritage value, which could aid their justification.

Protection of Existing Tourist Accommodation

Statutory Consultees

No comments were made in response to this policy/section.

Parish and Town Councils

Southwold Town Council requested that bed and breakfast accommodation is specifically referenced.

Other Organisations

No comments were made in response to this policy/section.
Developers/Landowners

Bourne Leisure requested that the policy is amended to specifically include support for expansion and improvements to existing tourism sites within settlement boundaries; in countryside locations; and in seafront locations.

Members of the Public

No comments were made in response to this policy/section.

How these comments have been taken into account in the Final Draft Local Plan

Reference to bed and breakfast accommodation has been added to the supporting text.

Extensions to existing tourism sites are covered in Policies WLP8.15 and WLP8.16
Retail and Town Centres

WLP8.18 New Town Centre Use Development

Statutory Consultees

South Norfolk District Council stated that it would be useful to add the date of completion of the Retail and Leisure Needs Assessment to paragraph 8.90.

Southwold Town Council requested a change in the text on page 212 to acknowledge Southwold’s role in the tourist industry.

Parish and Town Councils

Lowestoft Town Council supported a proposal to make the High Street a one way route because it would allow buses to access the High Street.

Beccles Town Council argued that the protection afforded retail premises within the secondary shopping frontage should be extended to the whole town centre.

Other Organisations

Halesworth and Blyth Valley Partnership supported the objective in paragraph 8.94 to protect and enhance the vitality and viability of town centres. Halesworth was a hub for the surrounding area and the conversion of retail premises to other uses should be resisted.

Developers/Landowners

Brookhouse Group Limited stated that there was no empirical evidence to support a retail impact threshold of 350 square metres and that therefore the policy should revert to the national threshold of 350 square metres.

Sainsbury’s Supermarkets suggested that 750 square metres would be a more appropriate threshold.

Tim Basey-Fisher stated that the Local Plan must be amended to remove policies that replicate those found in the National Planning Policy Framework.
Members of the Public

There were no representations from members of the public.

How these comments have been taken into account in the Final Draft Local Plan

The Local Plan’s text has been amended to include the completion date of the Retail and Leisure Needs Assessment.

The supporting text already refers to Southwold town centre’s role in serving the local tourist industry.

The protection afforded to retail units in primary frontages should not be extended to the whole of the town centre. Areas outside of the primary frontages have a weaker retail function and limiting the use to retail units in these peripheral areas may result in increased vacancies, undermining the vitality and viability of the centre overall.

Work undertaken by the Council has indicated that the retail impact test threshold is appropriate for the entire District.

The Local Plan does not seek to replicate national policies but rather to add locally specific policies and guidance. National policies are only repeated where it is necessary to support local guidance.

WLP8.19 Vitality and Viability of Town Centres

Statutory Consultees

South Norfolk District Council suggested target percentages for A1 uses in key retail centres. Phrases included in the Local Plan, such as ‘dominant retail appearance’ and ‘concentration of retail uses in the immediate street frontage’, were difficult to assess.

Parish and Town Councils

Southwold Town Council stated that paragraph 8.96 should make reference to the high rents and business rates of retail premises in Southwold that deter independent traders and deprive customers of choice.
Lowestoft Town Council drew attention to the continued need for office space in the Power Park, London Road North and the High Street. Employment should be prioritised over housing in these areas. In the High Street, London Road North and London Road South ground floor space should be used for retail and business and first floor space for residential uses.

Lowestoft Town Council supported mixed use developments in London Road North, Kirkley and the High Street provided that ground floor premises are used for retail. The change of use from retail to community activities should be supported provided that the building cannot be relet for retail use and is in an accessible location. Limiting the proportion of drinking establishments and hot food takeaways would support the daytime retail frontage and limit the impact of the night time economy.

Reydon Parish Council was concerned that not enough is being done to protect the independent character of Southwold High Street. Measures were needed to prevent the extension of retail premises so that they remain affordable for local businesses. They also draw attention to the impact of business rates on high street viability.

Beccles Town Council was concerned that the current policy wording does not protect shops outside of the primary and secondary frontages from change of use. Lines identifying primary and secondary frontages should be extended to include the whole town centre or reference to secondary frontages should be replaced with a reference to the remainder of the town centre. There is concern that the policy as it stands undermines the objective of protecting town centres.

Other Organisations

The Southwold and Reydon Society was concerned that measures to control change of use are insufficient to protect the character of the High Street and argued that it was also necessary to prevent extensions to retail premises so that they remained affordable to local retailers.

Developers/Landowners

There were no responses to this section.
Members of the Public

One member of the public stated that both the north and south sides of Bevan Street should be identified as a shopping frontage.

Another member of the public stated that Lowestoft town centre required significant improvement to cater for the increasing number of families that are moving to the area and also to reflect its prominent position within the local area.

How these comments have been taken into account in the Final Draft Local Plan

The Local Plan contains adequate protection for town centre retail. The supporting text has been amended to explain the purpose of designating primary and secondary frontages. This is to protect the retail function of town centres but also to allow a wider range of uses on the peripheral areas of town centres. It will also provide flexibility to allow town centres to adapt to changing circumstances. The supporting text will also provide extra clarity on the operation of the policy.

The protection afforded to retail units in primary and secondary shopping frontages should not be extended to the whole of the town centre. Areas outside of the primary and secondary shopping frontages have a weaker retail function and limiting the use of retail units in these peripheral areas prevents them from being adapted to changing circumstances.

Target percentages for A1 uses in key retail centres would remove flexibility, particularly in more peripheral parts of town centres where the retail function is weaker. This would prevent vacant units, which could not be occupied by another retailer, from being let for another use. It would therefore prevent peripheral parts of town centres from adapting to changing circumstances.

Rental levels and business rates cannot be controlled by the planning system and therefore it would not be appropriate to refer to them in the Local Plan. Although the planning system cannot limit the size of retail units to favour independent retailers it can include policies that ensure the provision of an appropriate range of retail unit sizes. This is a detailed issue which would not be possible to have a District-wide approach on and therefore would be better to be tackled in Neighbourhood Plans.
The PowerPark has been designated for employment space, which caters for the needs of the offshore renewable energy industry. The Local Plan also identifies part of Lowestoft Town Centre as an area of existing office use. However permitted development rights means that it may not be possible to prevent the conversion of offices in this area to different uses.

Within town centres the conversion of premises from town centre uses (including retail) to community use would only be permitted where it would support the vitality and viability of the town centre.

The protection afforded to retail units in primary and secondary shopping frontages should not be extended to the whole of the town centre. Areas outside of the primary and secondary shopping frontages have a weaker retail function and limiting the use of retail units in these peripheral areas prevents them from being adapted to changing circumstances.

The map of Bevan Street East has been amended so that the secondary shopping frontage includes both sides of the road.

**Sustainable Transport**

**Policy WLP8.21 – Sustainable Transport**

**Statutory Consultees**

No comments were made in response to this section/policy.

**Parish and Town Councils**

Lowestoft Town Council recommends –

- Electric vehicle points are included in all new or updated retail and large residential developments.
- Development layouts provide for cycles, safe cycle storage and recycling of waste materials.
- Car parks are protected from development.
- Developments are located to promote the use of public transport.
- The bus station on Gordon Road and other bus facilities are expanded and improved including installing a Real Time Passenger information system.
Other Organisations

Beccles and Bungay Cycle Strategy broadly supports the policy but would like the wording to be stronger, for the location of schools and services to be convenient for cycling and walking, and for shared paths to accommodate mobility vehicles as well as cycles and pedestrians.

Developers/Landowners

Bourne Leisure supports the vision of the policy and understands the importance of minimising climate change. However, they note that the private car if often the only suitable mode of transport for tourists travelling to holiday parks and hotels and therefore request a changing in the wording of the policy to reflect this.

Gladman Developments supports the policy but advises that development should only be refused on transport grounds where the impact is severe.

Members of the Public

Supporters highlighted the importance of the Waveney Cycle Strategy, the importance of good design particularly at the concept stage, the need for cycle facilities, the success of the path across the Millennium Green in Halesworth, and the opportunity to secure funds for cycle paths using Section 106 agreements or CIL. There is a request for local cycling groups to be consulted on the design of new developments. One member of the public requested that all houses provide at least three off road car parking spaces, not including any garage.

How these comments have been taken into account in the Final Draft Local Plan

Additional wording has been added to the policy to address issues raised including the need for safe design and layout of new cycle routes, cycle storage, mobility vehicles, and vehicle charging points.

Subject to Design policies, the policy on Sustainable Transport requires developments to meet the Suffolk Guidance for Parking issued by Suffolk County Council. The number of on-site parking spaces required relates to the number of bedrooms in the house.
Community Services and Facilities

Community Services and Facilities

Statutory Consultees
No comments submitted in response to this section.

Parish and Town Councils
No comments submitted in response to this section.

Other Organisations
No comments submitted in response to this section.

Developers/Landowners
No comments submitted in response to this section.

Members of the Public
One member of the public stated that Waveney District Council should do more in regards to this issue than it has in the past.

How these comments were taken into account in the Final Draft Local Plan
Comments noted. No changes necessary.

Policy WLP8.22 - Built Community Services and Facilities

Statutory Consultees
The Broads Authority questioned when an Asset of Community Value is sold, before the community purchases it, if the Asset would be de-listed. Under the current wording, nothing could happen to the asset if this happens.

South Norfolk District Council stated that they appreciate that this policy seeks to provide strong protection for ‘assets of community value’ from change of use or redevelopment; however they added that the policy may be too strict. They suggested providing a more flexible approach with strict criteria relating to change of use or redevelopment.
**Parish and Town Councils**

Lowestoft Town Council stated that the Councils need to take a lead on the collection and disposal of commercial waste and there should be more community recycling facilities. They added that they support the growth of further education providers and that there should be a dormitory housing, increased public transport encouragement for businesses to set up apprenticeships to help with this. There should also be more leisure provision for younger people and there should be an integrated network of open and leisure spaces and facilities as part of Lowestoft’s character. This network should go towards meeting any current deficits seen in Lowestoft. Infrastructure should also be linked to the Scores.

Reydon Parish Council supported this policy.

Southwold Town Council stated that the campaign to retain Southwold Hospital highlighted that there is a need to more broadly define community facilities to include services such as local shops. There is also strong community support to prevent change of use that increases land value, however a policy should be flexible enough so that parts of existing sites can be redeveloped with a change of use. There should also be encouragement for recycling, sites for affordable homes or business start-ups.

**Other Organisations**

The Southwold and Reydon Society supported this policy.

The Theatres Trust supported this policy.

**Developers/Landowners**

Richborough Estates Ltd supported this policy.

**Members of the Public**

No comments submitted in response to this policy.

**How these comments were taken into account in the Final Draft Local Plan**

The purpose of this policy is to protect the community use of an asset while it is listed as one. This lasts a maximum of 5 years after which the owner can do as they wish with the property. This at least gives the community a better opportunity to submit a competitive bid.
However, a more flexible approach could be taken regarding change of use. The policy has been reworded to allow a change of use to a different community use if necessary; however a change of use to non-community uses will still not be permitted. This allows for the situation where the local community or landowner may wish to use the asset for an alternative community use.

The Council considers that there is no need for further definition on what can be an Asset of Community Value. The supporting text of the policy already outlines what can be listed as an Asset of Community Value and national policy also outlines what can and can’t be included.

**Protection of Open Space**

**Statutory Consultees**

No comments submitted in response to this section.

**Parish and Town Councils**

No comments submitted in response to this section.

**Other Organisations**

No comments submitted in response to this section.

**Developers/Landowners**

No comments submitted in response to this section.

**Members of the Public**

No comments submitted in response to this section.

**How these comment were taken into account in the Final Draft Local Plan**

No comment submitted.
Policy WLP8.23 - Protection of Open Space

Statutory Consultees

The Broads Authority stated that it should be mentioned in section 8.118 of the supporting text that any open space that is located with the Broads Authority Executive Area of Waveney has been protected through the Broads Local Plan.

The Environment Agency fully supported this policy.

Parish and Town Councils

No comments submitted in response to this policy.

Other Organisations

Sport England supported this policy.

Developers/Landowners

No comments submitted in response to this policy.

Members of the Public

Members of the public supported this policy.

Members of the public requested that Lowestoft Town Council be encouraged to designate the North Denes area as Local Green Space due to its natural beauty, use by the local community and use as a green corridor. However some also stated that protecting the area through a Neighbourhood Plan is currently impractical due to Lowestoft Town Council still being a newly created council and so the area should be protected through the Local Plan. Any protection should exclude the current Tingdene Caravan Park.

One member of the public also suggested adding an additional criterion where development could take place on Open Spaces when there has been a full public consultation and the development is supported by the majority of the general public.

How these comments were taken into account in the Final Draft Local Plan

The policy has been amended to include reference to the protection from the Broads Local Plan.
North Denes is currently recognised as open space. However its designation as Local Green Space under a Neighbourhood Plan would provide the area with a greater level of protection.

The purpose of this scheme is to protect Open Spaces from inappropriate development when the space is of value to the local population. Adding further criteria to this policy would likely dilute the protection it offers. A more stringent policy such as how it is currently worded ensures that open areas will be protected for the use of the public.

Climate Change

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

Lowestoft Town Council considers that open space can perform more than one function such as flood water storage. Low areas at risk of flood should be kept open. Breaches of flood defences need to be reassessed. Need to take a lead on Green issues. Commercial waste needs to be dealt with in the same manner as household waste and recycled.

Other Organisations

The Marine Management Organisation suggests further in-depth references could be made to the marine plans. Climate change and erosion issue could reference the East Marine Plan policy CC1

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

One member of the public noted climate change was real, it is unlikely it can be reversed, and is important all planning decisions include solutions that acknowledge and alleviate the consequences. The respondent considered developers must cover the current and future costs of climate change.
Policy WLP8.24 – Flood Risk

Statutory Consultees

Anglia Water Services Ltd notes policy WLP8.24 only mentions flood zones but assumes flood risk from sewers and surface water will be considered in policies WLP1.4, WLP8.24 and WLP8.29.

The Broads Authority notes Waveney is affected by the BESL model issue.

The Environment Agency broadly supports the policy. The agency notes that paragraph 8.16 should include that modelling is being undertaken by Waveney District Council and other Risk Authorities. The policy should contain information regarding environmental permitting.

South Norfolk District Council is pleased that the 2008 Strategic Flood Risk Assessment is currently being updated. Waveney District Council will need to have some regard for the Norfolk SFRA currently being finalised.

Parish and Town Councils

Halesworth Town Council notes flooding after heavy rainfall is an increasing problem at the northern end of The Thoroughfare.

Lowestoft Town Council considers the wording renders the denial of building in flood zones toothless. The town council notes plans to build housing on the Sanyo/Jen Wen site in flood zone 3. The town council recommends a policy on the design of buildings adopting existing government standards.

Other Organisations

Benacre Estates Company supports the policy but notes the proximity of a residential allocation in Wrentham to a flood risk area.

The Forestry Commission notes new riparian and floodplain woodland can diffuse pollution, protect river morphology, moderate stream temperature, aid flood risk management, and meet Biodiversity Action Plan targets.

Gladman Developments Ltd considers the policy WLP8.24 inconsistent with national policy.

Developers/Landowners
Bourne Leisure Ltd considers policy WLP8.24 should refer to the exception applied to existing tourist accommodation and holiday parks.

A landowner considers that policy replicates the NPPF which does not need to be repeated.

Members of the Public

One member of the public raised concerns about developments outside of flood zones that could affect water catchment areas and increasing flooding elsewhere.

How these comments have been taken into account in the Final Draft Local Plan

Reference to Environmental Permitting Regulations 2010 (as amended) and Marine Licencing have been made.

Reference to surface water flooding and sustainable drainage has been moved to this policy form the design policy.

The Council considers that policy WLP8.24 is in accordance with national planning policy.

The Council considers that the policy is not repetition of national planning policy. It sets out matters of strategy and detail which are not repetition from national policy. Therefore there is no justification to delete elements of the policy.

The Councils Strategic Flood Risk Assessment takes a precautionary approach where data from the BESL model is not available. This is very similar to the Broads Authority’s approach.

Advice on building design is available in the SFRA and in Planning Practice Guidance. The design of buildings in a flood risk zone will be addressed through the site specific flood risk assessment which the policy requires as part of a planning application.

It is considered that the policy is sufficiently clear that it will be applied to new development proposals in areas of flood risk.

Suffolk County Council as Lead Local Flood Authority is consulted on all major development schemes. Building Regulations consent is required for most new development: residential or commercial. Areas at risk from flooding sources such as surface water, ground water and ordinary watercourses are recorded and mapped by Suffolk County Council. These will be taken in to account in determining planning applications.
Policy WLP8.25 – Coastal Change Management Area

Statutory Consultees

The Environment Agency supports the coastal section within the Local Plan. The Environmental Agency notes with regard to paragraph 8.131 that diversification of business affected by erosion is important, sustainability appraisals should compare proposal against ‘do nothing’ scenarios, and a more suitable land use or moveable dwelling should not be discounted. With regard to paragraph 8.132 the agency notes that it is important to work with landowners to promote the coastal path. With regard to paragraph 8.135 the agency notes it is important the statement does note preclude the concept of re-locatable buildings. With regard to paragraph 8.136 the agency notes that consideration of whether infrastructure is affected by coastal change should be mandatory for developments over a certain size and/or within a specified distance from the CCMA.

The Environment Agency supports the development of a Coastal Change Supplementary Document and recommends an adaptation section for landowners.

The Environment Agency recommends WLP8.25 policy maps are updated in accordance with coastal change, questions whether policy WLP8.25 gives sufficient scope for diversification, notes essential infrastructure will only be permitted within a CCMA where no other sites are feasible, and recommends management plans consider regeneration or the prevent of blight.

The Environment Agency supports statements regarding new or replacement coastal defences and reference to the community of Easton Bavents. With regard to paragraph 8.139 the agency recommends anticipatory adaption proposals in areas in imminent risk to prevent the negative consequences associated with more reactionary measures. With regard to paragraph 8.142 the agency notes that relocating close to the existing community is often difficult and the principle could be extended elsewhere in the district.

Natural England supports the policies for coastal change and recommends the plan includes a policy wording to maintain the character of the undeveloped coast and protect and enhance its distinctive landscape and sea scape.

Great Yarmouth Borough Council considers cross-boundary matters such as coastal change management to be adequately addressed.

Parish and Town Councils

Reydon Parish Council supports the policy.
Other Organisations

The Marine Management Organisation suggests further in-depth references including reference to East Marine Plan policy CC1.

Southwold and Reydon Society support the policies.

Developers/Landowners

The Benacre Estates Company is likely to have properties affected and is concerned about the condition for relocating dwellings adjacent to existing settlements. The company would like the policy to allow replacement dwellings to be located away from existing settlements, such as farmhouses relocated within the same farm, and isolated dwellings relocated within the same ownership, but outside the CCMA.

Members of the Public

One member of the public considers that no dwelling, including caravans occupied 52 weeks of the years should be permitted in the Coastal Change Management Area.

How these comments have been taken into account in the Final Draft Local Plan

The Policy has been amended to allow for consideration of new scientific information which may alter the delineation of what is considered the Coastal Change Management Area.

Reference to the East Inshore and Offshore Marine Plan have been made.

Policy WLP8.26 – Relocation and Replacement of Development Affected by Coastal Erosion

Statutory Consultees

Natural England supports the inclusion of coastal changes policies and recommends policy wording to maintain the character of the undeveloped coast and protect and enhance its distinctive landscape and seascape.

Parish and Town Councils

Reydon Parish Council supports the policy.
Other Organisations

Southwold and Reydon Society support the policy.

Developers/Landowners

Bourne Leisure Ltd supports the policy but is concerned it could restrict the identification of roll-back locations for sites such as Corton Coastal Village. An amendment is requested to the wording of the policy to state: “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”

Members of the Public

One former resident of Easton Bavents supports reserved plots and queries whether the plot would be the same size as the one she lost, whether the plot would affordable, and what restrictions would apply to the plot.

How these comments have been taken into account in the Final Draft Local Plan

The Policy will have the effect of maintaining the character of the undeveloped coast by removing properties blighted by erosion from prominent coastal positions. Proposals for relocation will have to comply with Policy WLP8.35 on Landscape Character which also provides protection for coastal landscapes.

A key driver for the policy to allow for the relocation of commercial and community facilities is about sustaining the viability of the coastal communities at risk from erosion and to allow them to adapt. Therefore it is considered essential that the relocation of businesses takes place in an accessible location to community from which it was displaced.

Policy WLP8.27 – Renewable and Low Carbon Energy

Statutory Consultees

The Broads Authority requests the policy refers to Broads’ Landscape Sensitivity Study and mentions the impact on landscape outside Waveney. The Broads Authority notes that the first bullet point of the policy includes considerations that are in other policies and that adding landscape character impact outside of the Waveney Area seems prudent.

The Forestry Commission notes woodfuel and timber supplies are an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.
Historic England recommends a specific policy on renewable technologies within the Conservation Areas, with regard to historic buildings, and the wider historic landscape. Historic England note that the policy should seek to limit and mitigate any cost to the historic environment. They also note that listed buildings, buildings in conservation areas and scheduled monuments are exempt from the need to comply with energy efficient requirements. Special consideration is given under Part L to locally listed buildings, building of architectural and historic interest within registered parks and gardens and curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric.

Parish and Town Councils

Lowestoft Town Council considers new developments should provide a minimum of 15% of energy demand from renewable or low carbon sources. Where this is not technically feasible or financially viable the council recommends additional energy efficiency measures such as under the Code for Sustainable Homes or BREEAM to achieve reductions in carbon emissions.

Other Organisations

Suffolk Preservation Society recommends the support text includes reference to design policy WLP8.29 as design issues can apply to renewable energy proposals.

Developers/Landowners

Bourne Leisure Ltd request that the Local Plan makes it clear that the offshore/renewable sector should not grow at the expense of existing industries such as tourism, that the Local Plan consider potential effects of renewable energy proposals on sensitive receptors such as holiday accommodation sites, and requests amendments to the wording of the supporting text and policy WLP8.27.

Members of the Public

One member of the public considers all industrial buildings should have mandatory solar panels fitted to the roof, the number fitted dependant on the size of the roof, and queries whether this could be applied retrospectively to existing units.

How these comments have been taken into account in the Final Draft Local Plan

National policies and the Historic Environment policies offer robust protection of the listed buildings, Conservation Areas and the wider historic landscape. Further detailed guidance is provided in the
Built Heritage and Design Supplementary Planning Document. Therefore an additional policy is not considered necessary.

New policies cannot be applied retrospectively; however the policy on Sustainable Construction requires proposals to demonstrate, where practical, they have incorporated renewable and low carbon energy generation, and other measures including sustainable water management, locally sourced and recycled materials and minimising construction waste.

The Local Plan cannot specify standards greater than those in Building Regulations such as the Code for Sustainable Homes.

Reference to design policies has been added to the supporting text.

The supporting text has been amended to include reference to visitors and the policy wording has been amended to included reference to businesses.

Reference has been made to the possible impact on neighbouring landscape character outside Waveney, including the Broads Authority area.

**Policy WLP8.28 – Sustainable Construction**

**Statutory Consultees**

Anglian Water Services Limited supports higher water efficiency standards, but does not consider the reference to further viability work necessary due to The Housing Standards Review Cost Impact report (2014) which showed the cost can be £6-93 per dwelling.

The Environment Agency supports the policy and provided website links with more information regarding water management and waste. The Environment Agency considers the wording regarding construction waste could be strengthened.

Historic England notes they could not identify how the policy relates to work to existing buildings.

Suffolk County Council welcomes reference to minimising waste in constructions and providing waste management facilities. (Comment pending political approval.)

**Parish and Town Councils**

Halesworth Town Council considers that refuse bins should be designed to be inconspicuous and not obstruct house frontages.
Other Organisations

The River Waveney Trust support the policy and considers that water efficiency standards should only be waived in exception circumstances, and ‘SWM3 SuDs and Water Efficiency’ should be incorporated.

Developers/Landowners

Badger Building considers the policy lacks clarity and the term “major development” should be replaced with a figure for 100 plus dwellings and specific floor area for commercial development.

Hopkins Homes, Richborough Estates Ltd, the Home Builders Federation and Gladman Developments consider there is insufficient evidence of the need and viability to justify the standards in the policy, and it could affect the viability or affordability of sites.

Tim Basey-Fisher considers the policy contrary to the Ministerial Statement as there is no evidence provided that the policy is viable and recommends the policy is deleted.

Members of the Public

One member of the public considers that sustainable construction should include secure, enclosed convenient cycle parking, and recycling human waste.

One member of the public considers that the standards should only be waived in exceptional circumstances.

How these comments have been taken into account in the Final Draft Local Plan

The evidence for requiring water efficiency standards comes from The Waveney Water Cycle Study and the Environment Agency. The Housing Standards Review Cost Impact report (2014) shows the cost implementing the measures are not excessive. Other elements of the policy are supported where practical.

Major residential schemes are classed as 10 or more houses and commercial development as 1,000sqm or more of floorspace.
Policy wording regarding cycle storage and electrical points has been moved to the Sustainable Transport Policy.

The Local Plan aims include providing sufficient housing and employment land to meet the future needs of people in Waveney, as identified in various strategic reports available in the East Suffolk website, and protecting the natural environment. Sustainable construction methods are supported where practical but standards higher than Building Regulations cannot be enforced in a Local Plan.

Secure cycle parking has been added into the Sustainable Transport Policy.

Provision for the storage and collection of waste and recycling bins is noted in the Design Policy.
Design

Statutory Consultees

South Norfolk Council fully supports planning for the needs of dementia.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

No comments were made in response to this section/policy.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

NA

Policy WLP8.29 Design

Statutory Consultees

Anglia Water Services Limited supports the requirement for applicants to provide Sustainable Drainage Systems and recommends additional wording to strengthen the policy.

Historic England welcomes the section on design but recommends the historic environment is provided for throughout the plan and not solely through heritage focused policies, that the historic environment is included within the design policies, and that the supporting text is enhanced to include locally specific examples.
South Norfolk District Council supports paragraph 8.161 in considering the ageing population and needs of those with dementia.

Suffolk County Council advises that Policy WLP8.29 and Building Regulations (Part B) should be sufficient to ensure fire safety requirements are considered. Suffolk County Council recommends the following additional wording is added to the end of paragraph 8.159 “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.”

Suffolk County Council welcomes the reference to the provisions for bins.

Parish and Town Councils

Halesworth Town Council recommends that parking is designed behind the building line to ensure uncluttered frontages.

Reydon Parish Council considers the policy open to considerable interpretation, has a preference for bold modern architecture which is in keeping the surroundings, and that buildings even in conservation areas should meet stringent sustainability standards.

Other Organisations

Beccles Society would like developers to be encouraged to employ competent architects, and for a plan of existing rights of way to be included on both the available sites and on the plan of the Beccles and Worlingham Garden Neighbourhood map.

The Bungay Neighbourhood Development Plan Steering Group stated that design quality should be made the central focus.

The River Waveney Trust supports the policy but recommend alternative, more positive wording.

The Southwold and Reydon Society has a preference for bold modern architecture which is in keeping the surroundings, would like the policy to reference the Suffolk Design Guide, and encourage low carbon technology.

Developers/Landowners

Gladman Developments Limited considers the policy should be more positively framed to encourage appropriate design. The company also considers that any harm should be balanced against
sustainability credentials and not necessarily result in a planning refusal, and that Building for Life 12 should not referred to within the policy.

Richborough Estates Ltd note that the policy relates to the designing of developments and outline planning applications would be supported by a range of reports.

Tim Basey-Fisher considers there is a lack of information and guidance, therefore proposals should either not be refuse planning permission based on design, or the local plan should explain how proposals will be assessed.

Members of the Public

Member of the public have commented –
- That all buildings should be carbon-neutral and generate their own energy.
- That development in rural areas should respect their locality, not vary in standard due to location, and not urbanise villages.

Concern has been raised regarding the issues in the Building for Equality: Disability and the Built Environment report (2017), the impact on disabled people if they do not have equal safe access to public spaces, and the impact of ‘shared-spaces’. It is noted that the Parliamentary Committee recommends a moratorium of futures schemes with shared spaces.

There are requests for –
- The needs of a growing elderly population to be considered.
- Someone appointed to safeguard the needs of disabled people.
- Wide, clear footpaths that are not shared with vehicles and have kerbs.
- Audible controlled crossing points.
- Roads wide enough for buses.
- A councillor and planner to visit sites regularly with the power to halt construction.
- Stop relying on the ‘stage three safety audit’ for road safety.
- Not allow the most profitable development to take place before social provision.

How these comments have been taken into account in the Final Draft Local Plan

Additional text recommended by Suffolk County Council has been added to the supporting text regarding consideration for emergency vehicles.

The policy wording regarding open space has been removed and new policy on the Design of Open Space has been provided.
Additional policy text has been added to ensure good design principles are prioritised over parking to prevent car dominated street scenes.

Policy wording regarding drainage has been enhanced as recommended by Anglia Water Service and moved to the Policy WLP8.24 Flood Risk.

Local examples have not been cited in the policy or supporting text as the Council wishes to improve the current design standards in Waveney rather than point to existing examples. Additional wording regarding the historic environment is not considered necessary. The dedicated policies in the Draft Local Plan on the Historic Environment and National Planning Policies provide sufficient protection for designated and undesignated heritage assets.

The Council is unable to enforce buildings standards higher than those in Building Regulations. The policy on Sustainable Construction requires proposals to demonstrate, where practical, they have incorporated renewable and low carbon energy generation, and other measures including sustainable water management, locally sourced and recycled materials and minimising construction waste.

A new Policy on lifetime design has been provided. The policy directly addresses concerns raised by the public for a policy that considers the needs of the elderly and disabled. Many of the principles of good design that support those with dementia result in well designed spaces and place that benefit those with other disabilities and benefit the community as a whole.

The Suffolk Design Guide was first adopted in 1993 by Suffolk County Council. As a result of its age it no longer represents the best practice and is due to be reviewed. Reference has instead been made to recent documents such as Building for Life 12.

Policy WLP8.30 Housing Density and Design

Statutory Consultees

No comments were made in response to this section/policy.

Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

No comments were made in response to this section/policy.
Developers/Landowners

Badger Building supports the policy.

Richborough Estates Ltd note the policy provides some flexibility and that a single housing density should not be applied rigidly.

Somerleyton Estate (Lord Somerleyton) objects to the wording of the policy and recommends alternative wording that allows Neighbourhood Plans “or where relevant Design Briefs in the form of Supplementary Planning Documents” to set policies for housing density. Somerleyton Estate supports the principle of the neighbourhood plan addressing density and notes that alternative sites in the village remain available. Somerleyton Estates recommends the Local Plan addresses when a Supplementary Planning Document would be development in preference to a neighbourhood plan that was not advancing.

Members of the Public

A member of the public requests high architectural values are included in the policy.

How these comments have been taken into account in the Final Draft Local Plan

The policy includes sufficient flexibility regarding housing density. The specific concerns regarding Somerleyton have been addressed under the site allocation policies and architectural values have been addressed in Design Policy WLP8.29.

Policy WLP8.31 Residential and Urban Infilling

Statutory Consultees

The Broads Authority recommends all trees with landscape, amenity or biodiversity value are protected.

Historic England suggests a small alteration to the wording to prevent the policy implying that only designated assets should be considered.

Parish and Town Councils

Lowestoft Town Council note the importance of external amenity space for each dwelling, that additional dwellings in a town can result in infrastructure improvements that benefit existing homes, but that the impact of developing infill and brownfield sites does not come without a cost to the existing neighbourhoods.
Lowestoft Town Council does not see any provisions made for the increase stress on roads, services and facilities. Lowestoft Town Council also raises concerns regarding infill spacing between houses, the use of front garden for parking, the conversion of houses for multi occupancy, and lack of any mention of solar panels.

Southwold Town Council considers more could be done to protect gardens as a source of wildlife habitat.

Reydon Parish Council supports the policy.

Other Organisations

Southwold and Reydon Society support the policy.

Developers/Landowners

Badger Building supports the policy.

Members of the Public

Member of the public –

- Recommend flooding and the need for soakaways to be mentioned in the policy.
- Queried whether “concreting over gardens” was banned.
- Suggested stronger wording to discourage inappropriate development.
- Consider back garden developments require specific guidance.
- Consider the Suffolk Coastal policy much stronger and clearer.
- Support of local residents should be required.
- Preferred existing policy DM02.

How these comments have been taken into account in the Final Draft Local Plan

The reference to the historic environment is not limited to designated heritage assets and the policy wording does not specify this.

Flood Risk is addressed under policy WLP8.24. It is not considered necessary to repeat this information under this policy.

Under permitted development rights planning permission for residential properties is only required for non-permeable surfaces that exceed 5 sqm, there is no limit to permeable surfaces that can be
installed, and 50% of the garden maybe covered in ancillary buildings. Applications for areas of non-permeable surface in excess of 5sqm will be assessed under Policy WLP8.24 on Flood Risk and Policy WLP8.29 on Design which includes the requirements for proposals to respond to local context. It is considered that there needs to be greater awareness of what works to gardens require planning permission.

The wording of the policy is designed to protect against inappropriate development that would have a detrimental impact on existing neighbourhoods. Stronger wording has not been used as policies should ideally be positively worded.
Natural Environment

Biodiversity

Statutory Consultees
No comments submitted in response to this section.

Parish and Town Councils
No comments submitted in response to this section.

Other Organisations
No comments submitted in response to this section.

Developers/Landowners
No comments submitted in response to this section.

Members of the Public
No comments submitted in response to this section.

How these comments were taken into account in the Final Draft Local Plan
No comments submitted.

Policy WLP8.32 - Biodiversity and Geodiversity

Statutory Consultees
The Environment Agency stated that they strongly support this policy adding that any proposal must be preceded by a baseline survey and they would re-iterate any necessary mitigation or compensation. It could be incorporated that any new development must create a new priority habitat and could link to other habitats through green corridors on schemes of a larger scale.

Norfolk County Council stated that there is potential impact on internationally protected habitats in Norfolk as a result of development in Waveney, for example from recreational use. They added that a Norfolk Green Infrastructure Mapping project is underway and that this could be extended in to Waveney.
South Norfolk District Council suggested including the date of the Green Infrastructure Study.

**Parish and Town Councils**

Lowestoft Town Council acknowledged that the Local Plan protects many of the valued biodiversity areas seen in the District and will not permit development where there will be a net loss of biodiversity and geodiversity interests. It was also stated that the policy acknowledges the importance of these areas to local character and ecological networks and that direct and indirect impacts will be taken into account. It was suggested that developers consult with the WDC Tree Protection Officer as early as possible to discuss mitigation measures both on and off site in regards to tree loss.

**Other Organisations**

Bourne Leisure Ltd suggested that the policy should be reworded to be more consistent with national guidance. This includes only requiring ecological surveys where clearly justified and including mitigation through planning conditions to contribute to the acceptability of proposals.

The Forestry Commission stated that they were not in a position to comment on Local Plan consultations; however they did provide an overview of Government policy on ancient woodland. This included a summary of the Natural Environment and Rural Communities Act 2006 as well as overviews of the protection and expectations on local authorities stemming from the National Planning Policy Framework and National Planning Practice Guidance. They also included other information from their Standing Advice for Ancient Woodland and Veteran Trees 2014, the Keepers of Time statement 2005, ‘The Natural Choice’ White Paper 2011 and Biodiversity 2020.

The River Waveney Trust stated that they support the positive element of the policy but added that the rest should be more strongly worded with a presumption against any development that results in a loss of green infrastructure and biodiversity. They added that maintaining green infrastructure and biodiversity also sets aspirations too low.

The Suffolk Wildlife Trust supports this policy, especially its reference to County Wildlife Sites and Priority Species and Habitats and securing ecological enhancements. They suggested an amendment to the policy specifically mentioning Priority Species or Habitats, mitigation or compensation and ecological enhancements in the fourth paragraph.

**Developers/Landowners**

No comments submitted in response to this policy.
Members of the Public

One member of the public commented that the purpose of this policy should be to protect important habitats from development at all costs. Compensating for a loss of habitats is usually costly and allowing this may give way to inappropriate developments that go against the wishes of local residents. The views of local residents should not be ignored. There was also concern raised over proposals on internationally protected sites which would require mitigation potentially at the cost of the Council.

One member of the public stated that green corridors and open spaces should be planned for within developments.

One member of the public stated that they hoped that WDC were working with the Suffolk Wildlife Trust to ensure safe pathways for wildlife.

Another member of the public suggested that the Gunton Meadow Nature Reserve, which is currently listed as open space, should be designated as a Local Nature Reserve or County Wildlife Site.

Another member of the public stated that agricultural land of grades 1, 2 and 3A should be protected from solar farm, residential and commercial development wherever possible.

Another member of the public stated that this policy should be worded more positively so that it always seeks restoration and enhancement especially in terms of sustainability, not just ‘where practical’ or under ‘exceptional circumstances’.

How these comments were taken into account in the Final Draft Local Plan

The policy has been amended to include the date of the Green Infrastructure Study.

The purpose of this policy is to ensure that all protected and valuable species and habitats are protected from adverse impacts with the potential to improve and enhance such areas where appropriate. However this must be balanced with the other needs in the Local Plan. While protected species and habitats should not be lost to development, at the same time development should not be inhibited by a too stringent policy where it would otherwise be appropriate. This policy balances these needs by requiring assessments where they are needed and allowing for compensatory habitats where these are possible as well as inhibiting development where it will impact upon the most vulnerable and valuable areas.

The impact on internationally and nationally important habitats and areas has been considered in the Habitats Regulation Assessment. Any significant impacts from the proposed development in the
Local Plan will be mitigated through the development of Recreation Avoidance Mitigation Strategies to ensure that these habitats are adequately protected from increased use.

Gunton Meadow Nature Reserve, while not covered under this policy, will be protected by the Protection of Open Space policy in the Local Plan which greatly limits development on open spaces shown on the Policies Map.

**Landscape Character**

**Statutory Consultees**

No comments submitted in response to this section.

**Parish and Town Councils**

No comments submitted in response to this section.

**Other Organisations**

No comments submitted in response to this section.

**Developers/Landowners**

No comments submitted in response to this section.

**Members of the Public**

No comments submitted in response to this section.

**How these comments were taken into account in the Final Draft Local Plan**

No comments submitted.

**Policy WLP8.33 - Landscape Character**

**Statutory Consultees**

The Broads Authority enquired whether the last line on policy WLP8.33 could be reworded to include the Broads. They also stated that there had been a further update to the Broads Landscape
Character Assessment and supported the inclusion of the Dark Sky work. They also stated that the Broads is not a National Park but has an equivalent status for planning purposes.

South Norfolk District Council supported the sentiment of the policy but suggested that the policy should be more positively worded.

Suffolk County Council supported this policy and stated that it is based on robust evidence of the landscape characteristics of the District.

Parish and Town Councils

Lowestoft Town Council questioned whether enhancement as mentioned in this policy will necessarily be positive. They acknowledged that any development with have to be harmonious with its surroundings and its occupiers, which could include designing for an aging population. They acknowledged that all new buildings will not extend higher than the average height within a 50 metre radius, with the exception of decorative elements and major development should incorporate public art into its design concept where possible, otherwise the Council will seek a contribution to ‘pool’ works off site. They acknowledged that the Town and District Council should work together to bring vacant properties back into use and that all new developments will have to be well designed and sustainable in line with National Planning Policy. This expectation of sustainability extends to business, dockside and industrial areas as well as coastal areas.

Other Organisations

The Suffolk Coast and Heaths Area of Outstanding Natural Beauty Organisation stated that they wish to see reference within the policy to historic landscape features. They added that they wish to see the policy highlight the national significance of the AONB by introducing strict criteria on development within the AONB and introducing the necessity for mitigation or compensation with any development within the area.

The Suffolk Preservation Society stated that the draft policy does not acknowledge the importance of AONBs by giving them the same status as locally sensitive landscapes and should refer to paragraphs 115 and 116 of the NPPF. They also referenced a draft policy from the Colchester Borough Council Draft Local Plan as an example of a more robust policy.

Developers/Landowners

No comments submitted in response to this policy.
Members of the Public

One member of the public stated that this policy downgrades the protection offered to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty by equating it to locally sensitive land that does not have the same designation. They added that they wish to see a more robust policy referencing NPPF paragraphs 115 and 116. One member of the public questioned whether the enhancement stated in the policy would necessarily be positive.

One member of the public questioned whether enhancement as mentioned in the policy is necessarily positive.

How these comments were taken into account in the Final Draft Local Plan

The policy has been amended to include reference to the Broads authority in the Dark Sky work and the Broads Authority Landscape Character Area Assessment date has been updated.

The Council believes that the policy is sufficiently positive as to not completely inhibit development within character areas, but also provides sufficient protection to ensure that the characteristics of these areas are preserved. Any enhancement to these areas therefore must not be detrimental to the characteristics of the areas and any such proposals would be refused under this policy.

The policy specifically references the setting of the AONB rather than the AONB itself. The AONB is considered to receive substantial protection from national policy which is not considered necessary to repeat at a local level. The policy has been reworded to ensure that reference to the setting of the AONB is clear, and that the land in the AONB itself is protected through national policy.

Coalescence of Settlements

Statutory Consultees

No comments submitted in response to this section.

Parish and Town Councils

No comments submitted in response to this section.

Other Organisations

No comments submitted in response to this section.
Developers/Landowners

No comments submitted in response to this section.

Members of the Public

No comments submitted in response to this section.

How these comments were taken into account in the Final Draft Local Plan

No comments submitted.

Policy WLP8.34 - Coalescence of Settlements

Statutory Consultees

Great Yarmouth Borough Council stated they were pleased to see a gap maintained between the North Lowestoft Garden Village (WLP2.12) and Hopton-on-Sea. They also stated their support for the Corton Strategy. They added that they would like to see Hopton-on-Sea listed as within the Great Yarmouth Borough within the supporting text.

Historic England supported this policy.

South Norfolk District Council supported the sentiment of this policy however suggested that the policy should be worded in a more positive manner. For example, they suggested stating that ‘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’. They argued this will bring the policy closer to the NPPF intention on the wording of policies.

Parish and Town Councils

Beccles Town Council stated that the policy provides limited protection for land outside of boundaries and that the policy can be overruled by Neighbourhood Plans and Council decisions. They added that they would like to see more protection for the land north of Lowestoft Road between Beccles and Worlingham.

Other Organisations

No comments submitted in response to this policy.
Landowners/Developers

Badger Building did not support the wording of this policy stating that the policy is too absolute and would block development on settlement fringes that could fit into the landscape. They added that this policy would work better as a criteria based policy.

Gladman Developments Ltd noted the policy and stated that a criteria based policy is necessary for the protection of areas.

Members of the Public

Members of the public were in favour of this policy.

Another member of the public stated that the protection of the gap between Gunton and Corton was important and that open space and leisure spaces such as the Dip Farm football pitches should be recognised.

How these comments were taken into account in the Final Draft Local Plan

The supporting text has been amended to show that Hopton-on-Sea is within the Great Yarmouth Borough.

The policy has been reworded in a more positive manner as to not completely inhibit development. Development will now only be permitted where it does not lead to coalescence.

The Council believes that a criteria based approach to this policy is not necessary as any criteria listed in this policy would most likely repeat what is already in other policies, especially in regards to design and landscape character. Any development will have to meet the requirements of these policies as well as this policy in order to be permitted.
Historic Environment

Policy WLP8.35 Heritage Assets

Statutory Consultees

Historic England recommended the chapter on the Historic Environment would benefit from further consideration and made the following comments –

- Paragraph 8.196 suggested there are different levels of protection for heritage assets which was not the case and referred to paragraph 132 and 133 of the NPPF.
- The request for a Heritage impact assessment in Policy WLP8.35 needed to be proportionate to the scheme proposed and the number and significance of the heritage assets affected.
- In paragraph 8.197 the distinction between non-designated heritage assets and designated heritage, and how a non-designated heritage asset was identified was unclear.
- Welcomed the creation and management of a local Heritage at Risk register and expected to see the Local Plan address how it could help heritage at risk.
- There were three Registered Parks and Gardens which should be considered for protection through policy.
- Encouraged a policy that anticipated and protected future designations.
- Landscape setting may fall within neighbouring authorities and where relevant evidence will be sought of cross-boundary co-operation.
- Recommended further work to be undertaken to provide locally specific policies.
- An overarching historic environment policy was expected to be supported by policies for: listed buildings, schedules monuments and archaeology, conservation areas, registered parks and gardens, non-designated heritage assets (including locally listed buildings), and heritage at risk.

South Norfolk District Council noted in paragraph 8.199 it would be useful to include the publication date of the Built Heritage and Design Supplementary Planning Document.

Suffolk Coast & Heaths Area of Outstanding Natural Beauty considered the policy respect of Enabling Development needs clarity and reference to the Historic England Criteria.

Suffolk County Council stated that on page 248, paragraph 8.195 there should be a reference to the Historic Environment Record. Policy WLP8.35 should make explicit reference to archaeology and all other types of historic assets. This would complement WLP8.38, which provided further information about archaeological assets. It may also be worth repeating paragraph 8.198 in the archaeology section.
Parish and Town Councils

No comments were made in response to this section/policy.

Other Organisations

Suffolk Preservation Society noted the use of the term ‘enabling development’ in reference to policy WLP2.18. There was no policy in the Local Plan regarding Enabling Development. The Society recommended the wording for a new Enabling Development Policy that adopted the Historic England criteria.

Policy WLP8.35 lacked rigour and did not follow national guidance. The society recommended the terminology reflected the NPPF. The society provided an example of good policy wording that it recommended.

Developers/Landowners

Gladman Developments Ltd considered there should be a distinction made between designated and non-designated heritage assets that was reflected in policy and the assessing of applications.

Bourne Leisure Ltd supported the comments made in paragraphs 8.197 and 9.198 and policy WLP8.35.

Members of the Public

No comments were made in response to this section/policy.

How these comments have been taken into account in the Final Draft Local Plan

Overall it was considered that the Local Plan provided a comprehensive and overarching set of policies for the historic environment. The Local Plan did not seek to replicate national policies but rather to provide additional policies to guide development within the District so that it enhanced and protected the historic environment. This included material contained in both the Local Plan and the Built Heritage and Design Supplementary Planning Documents SPD, which will be updated when required.

The supporting text has been amended to clarify the distinction between local and national policies.

The supporting text has been amended to state that the National Planning Policy Framework provides protection to all heritage assets but that the weight given to the conservation of a heritage
asset increases with its level of importance. Both the New Local Plan and Built heritage and Design SPD provided guidance about how a non-designated heritage asset was identified.

Policy WLP8.35 (now WLP8.37) has been amended to ensure that the requirement for a heritage impact assessment will be proportionate to the scheme proposed and the number and significance of the heritage assets affected.

The supporting text has been amended to ensure that there is a clear distinction between designated and non-designated heritage assets. Registered parks and gardens are already covered by national policy and therefore reference will not be made to them in the Local Plan. None of the sites proposed for allocation in the Local Plan affect a heritage asset in a neighbouring District and so there is no requirement to cooperate with a neighbouring Local Authority.

The supporting text has been amended to include the publication date of the Built Heritage and Design Supplementary Planning Document.

Local information and guidance can already be found in conservation area appraisals and management plans; neighbourhood plans will also provide locally specific policies and guidance. The Local Plan provided an overarching policy regarding the historic environment.

The supporting text has been amended to make reference to the historic environment record. Policy WLP8.35 (now WLP8.37) has been amended to make explicit reference to archaeology and all other types of heritage asset.

Policy WLP8.36 Locally Listed Buildings and Non-Designated Heritage Assets

Statutory Consultees

Historic England recommended their published guidance on Local Listings. Historic England noted that ‘non-designated heritage assets’ were recognised as having a degree of significance meriting consideration in planning decisions. Historic England recommended as a minimum a local authority has criteria for identifying non-designated heritage assets, and ideally had a local list of assets linked to planning policies. The Local Plan should enable Conservation Area Management Plans to be updated and should direct development so that it respected the character of conservation areas.

Parish and Town Councils

Lowestoft Town Council encouraged the retention and upkeep of locally listed buildings. Where the benefits of replacement outweighed the retention of buildings, the town council expected a high standard of design and sustainability features. The loss of locally listed buildings should only be
allowed where it can be demonstrated that their replacement will be of an equal or higher design standard and included sustainability features.

Other Organisations

The Suffolk Preservation Society noted the variety of terms used in the plan. To avoid confusion the society recommended the single term Non Designated Heritage Asset was used. The society expressed concern regarding inconsistencies in how policies that related to non-designated heritage assets were handled amongst Independent Examiners of Neighbourhood Plans and therefore noted it was important that Waveney policy was clear that non-designated heritage assets could be located outside conservation areas. To comply with the NPPF, the society recommended alterations to the wording to state that Neighbourhood Plans identify buildings in conjunction with the local authority.

Developers/Landowners

Gladman Developments Ltd considered there should be a distinction made between designated and non-designated heritage assets that was reflected in policy and the assessing of applications.

Members of the Public

One member of the public supported the policy but was critical of the Council’s track record in preserving heritage assets and recommended historical societies and preservation trusts provided guidance to the council and planners.

How these comments have been taken into account in the Final Draft Local Plan

The supporting text of Policy WLP8.36 (now WLP8.38) provided criteria for identifying non-designated heritage assets. Further guidance could also be found in the Built Heritage and Design SPD. The Council provided a list of assets on its website and locally listed buildings were shown on the Policies Map. Local Plan policies enabled conservation area appraisals to be updated and direct development so that it respected the character of conservation areas.

Local Plan policy WLP8.36 will only permit the loss of a locally listed building or other non-designated heritage assets if all other options to preserve the asset have been exhausted. Paragraph 4.21 of the Built Heritage and Design SPD detailed the circumstances of when demolition was acceptable and the need for detailed plans for site redevelopment. Redevelopment should accord with the Local Plan’s policies on design quality and sustainability.

Non-designated heritage assets referred to any heritage asset that had not been identified at the national level. The Local List identified non-designated heritage assets within the District. Policy WLP8.36 explained the difference between the two terms and the supporting text contained criteria
about the inclusion of non-designated heritage assets on the local list. Neighbourhood planning groups will prepare neighbourhood plans in consultation with the District Council, which includes the identification of locally identified non-designated heritage assets.

The Council cooperated with local historical societies and preservation trusts with regard to identification and protection of heritage assets.

**Policy WLP8.37 Conservation Areas**

**Statutory Consultees**

Historic England advised that the local plan process provided a basis for continued update and management of Conservation Management Plans. These should identify features that typified and contributed to special distinctiveness. The plan would be more robust where it directed future development to take account of the special and distinctive character of the Conservation Area. Historic England would welcome provision for future designation of conservation areas and provision for landscape setting.

**Parish and Town Councils**

Beccles Town Council requested an amendment to the policy allowing replacement doors, windows and porches in the conservation area to be constructed of an appropriate appearance, rather than appropriate materials.

Lowestoft Town Council recognised the character and distinctiveness of Lowestoft, was keen to protect and enhance the town’s Conservation Area, noted the presumption in favour of retaining buildings, and stated that local authorities should afford the highest level of protection to the wider historic environment which contributed to the distinctiveness of the region.

**Other Organisations**

The Suffolk Preservation Society advised that if outline planning applications provided insufficient detail to fully consider the effects on a conservation area, the Local Planning Authority could require further detail and this should be noted in the text.

**Developers/Landowners**

No comments were made in response to this section/policy.
Members of the Public

Two members of the public stated that there should be greater control of replacement doors and windows. Replacements should use the same materials as the originals and applications should be accompanied by detailed diagrams.

How these comments have been taken into account in the Final Draft Local Plan

Conservation Area Appraisals and accompanying management plans are updated on an ongoing basis and the supporting text will state that these will be updated form time to time. Policy WLP8.37 (now WLP8.39) requires planning applications within conservation areas to be assessed against conservation area appraisals and management plans.

Doors and windows were an important part of the fabric and appearance of a heritage asset. It was therefore important that historically appropriate materials were used in replacement doors and windows rather than modern materials, even if they were made to a historically accurate design.

Planning applications in conservation areas and other parts of the District were not considered unless they complied with the information requirements set out on the Council’s website.

Policy WLP8.38 Archaeology

Statutory Consultees

Historic England queried the wording and questioned who will determine what is ‘more appropriate’ for archaeology. Clear guidance on expectations for archaeological recording and remains are encouraged. Weight should be given to known archaeological potential during site selection. Close liaison with County Archaeologist at site allocation stage was encouraged.

Suffolk County Council stated that reference should be made to the Historic Environment Record and should be related to paragraph 8.198, unless policy WLP8.35 was made more explicit. Paragraph 2.11 should be reworded to state that preservation in situ was preferable but that where this was not possible developers had to make arrangements to investigate and record sites, to make the results publicly available and enhance public understanding. Alternative wording was suggested for policy WLP8.38, which detailed the requirements for archaeological investigation, preservation in situ, recording and archiving archaeological content. It was suggested that the amended policy and supporting text should be discussed with Historic England.

Parish and Town Councils

No comments were made in response to this section/policy.
Other Organisations

No comments were made in response to this section/policy.

Developers/Landowners

Somerleyton Estate and Sotterly Estate objected to the policy as onerous as full archaeological assessments are required with any application, even applications for a change of use with ground excavations. The requirement for archaeological assessment was already set down in the local validation guidance. The term ‘suspected archaeological importance’ needed to be clarified. The policy should reference the Suffolk Historic Environment Record’s areas of high, medium and low areas of archaeological potential instead of ‘known or suspected’ areas, and include the planning requirements for each level.

Members of the Public

One member of the public noted the interactive map shows limited archaeological information. The attached Aggregates Levy Sustainability Fund English Heritage Project Ref: 3987 map was recommended for information.

How these comments have been taken into account in the Final Draft Local Plan

The Council worked in cooperation with Suffolk County Council Archaeology Service during the selection of site allocations and weight was given to archaeological content during the site selection process.

The policy has been amended to make reference to the need to describe and preserve archaeological remains by a suitably qualified individual. Supporting text has been amended to make reference to the Historic Environment Record, the type of archaeological assessment required, and when the curation of archaeological remains will take place. Supporting text will also include details about post consent investigation and encourage outreach as part of archaeological work.

The policy only requires an archaeological assessment for applications affecting areas of known or suspected archaeological importance. Therefore an assessment will not be required where an application does not affect a heritage asset. Suspected archaeological importance is defined by Waveney District Council on a case by case basis with advice from Suffolk County Council and Historic England. Requirements to record and describe heritage assets should be proportionate to their importance and the impact of development.

The Historic Environment Record does not classify areas as being of high, medium or low potential. However it is the main source of evidence for judging archaeological potential.
## Appendix 3 – Regulation 19 consultation details

### Who was consulted

As for the earlier Options and First Draft Local Plan consultations the following organisations and individuals were consulted.

<table>
<thead>
<tr>
<th>Specific consultation bodies</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Coal Authority</td>
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<tr>
<td>Environment Agency</td>
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<tr>
<td>Historic England</td>
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<td>Marine Management Organisation</td>
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<td>Natural England</td>
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<tr>
<td>Network Rail</td>
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<tr>
<td>Highways Agency</td>
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<tr>
<td>Norfolk County Council</td>
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<tr>
<td>Suffolk County Council</td>
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<tr>
<td>Parish and Town Councils within and adjoining the Waveney District</td>
</tr>
<tr>
<td>Suffolk Constabulary and Norfolk Constabulary</td>
</tr>
<tr>
<td>Adjoining local planning authorities - The Broads Authority, Mid Suffolk District Council, Suffolk Coastal District Council, South Norfolk District Council, Great Yarmouth Borough Council</td>
</tr>
<tr>
<td>NHS England and HealthEast (NHS Great Yarmouth and Waveney Clinical Commissioning Group)</td>
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<tr>
<td>Anglian Water</td>
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<tr>
<td>Essex and Suffolk Water</td>
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<tr>
<td>Homes and Communities Agency</td>
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<tr>
<td>Electronic communication companies who own or control apparatus in the Waveney District</td>
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<tr>
<td>Relevant gas and electricity companies</td>
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<table>
<thead>
<tr>
<th>General consultation bodies</th>
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<tbody>
<tr>
<td>Voluntary bodies some or all of whose activities benefit any part of the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of different racial, ethnic or national groups in the District</td>
</tr>
<tr>
<td>Bodies which represent the interests of different religious groups in the District</td>
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<tr>
<td>Bodies which represent the interests of disabled persons in the District</td>
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<tr>
<td>Bodies which represent the interests of persons carrying on business in the District</td>
</tr>
</tbody>
</table>

Examples include:

- Abeillo Greater Anglia Ltd
- Active Waveney Sports Partnership
- Associated British Ports
- Beccles Society
- Bungay Society
- Community Action Suffolk
- DIAL Lowestoft and Waveney
How they were consulted

Public drop in sessions

<table>
<thead>
<tr>
<th>Location</th>
<th>Date/time</th>
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<tbody>
<tr>
<td>Beccles - Public Hall</td>
<td>Wednesday 18 April 2-8pm</td>
</tr>
<tr>
<td>Halesworth - Rifle Hall</td>
<td>Thursday 19 April 5-8pm</td>
</tr>
<tr>
<td>Reydon - Village Hall</td>
<td>Tuesday 24 April 5-8pm</td>
</tr>
<tr>
<td>Bungay - Fisher Theatre (The Gallery)</td>
<td>Wednesday 25 April 5-8pm</td>
</tr>
<tr>
<td>Lowestoft - Riverside</td>
<td>Tuesday 1 May 2-8pm</td>
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Presentations, meetings and workshops

<table>
<thead>
<tr>
<th>Audience</th>
<th>Date/time</th>
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<tbody>
<tr>
<td>Waveney Town and Parish Councils</td>
<td>Wednesday 28 March 6pm (Riverside)</td>
</tr>
<tr>
<td>Waveney Developer Forum</td>
<td>Thursday 26 April 10am (Riverside)</td>
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</tbody>
</table>

Media and publicity

- 12 March 2018 - Town and Parish Councils informed that the Waveney Final Draft Plan is to be considered at 21 March Full Council meeting. Web link to Council agenda/report provided. Proposed timetable for the representation period (29 March to 24 May) and Submission for Examination set out, if so approved by Council. Invitation to briefing session to be held 23 March.
- 3 April 2018 - Council press release “Final draft of Waveney Local Plan published”
### Date and Media Details

<table>
<thead>
<tr>
<th>Date</th>
<th>Media</th>
<th>Details</th>
</tr>
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<tbody>
<tr>
<td>3 April</td>
<td>Beach Radio (on line)</td>
<td>“Plans for Nine Thousand New Homes in Waveney Published”</td>
</tr>
<tr>
<td>10 April</td>
<td>Beccles and Bungay journal (on line), Eastern Daily Press (on line) and facebook, Lowestoft Journal (on line)</td>
<td>“Residents given another say on development plan for Waveney as final draft is published”, drop in session times included in article</td>
</tr>
<tr>
<td>11 April</td>
<td>Southwold Tourist Information (on line)</td>
<td>Reydon drop in session publicised with link to Council press release and link to Lowestoft Journal (on line) link posted 10 April</td>
</tr>
<tr>
<td>13 May</td>
<td>Waveney Advertiser</td>
<td>“Public given final say on Local Plan” front page</td>
</tr>
</tbody>
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### During representation period

Various twitter feeds regarding the drop in sessions

A number of town and parish councils promoted the Final Draft consultation on their websites/social media (e.g. Ashby, Somerleyton and Herringfleet; Rumburgh; Brampton with Stoven) and parish noticeboards (e.g. Gisleham, Worlingham) and parish magazines (e.g. Carlton Colville, Kessingland).

### Consultation and publicity materials

<table>
<thead>
<tr>
<th>Materials</th>
<th>Details</th>
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<tbody>
<tr>
<td>Waveney Local Plan Final Draft Policies Map</td>
<td>PDF version on website</td>
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<td></td>
<td>Consultation portal version on website</td>
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<td></td>
<td>Copy provided to Town and Parish Councils</td>
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<tr>
<td></td>
<td>Inspection copies available at Marina Customer Service Centre, libraries, drop in sessions</td>
</tr>
<tr>
<td>Consultation poster included drop in session details</td>
<td>Hardcopies provided to Town and Parish Councils libraries and drop in session venues</td>
</tr>
<tr>
<td>Site notices</td>
<td>Site notices placed on boundary / vicinity of each site allocation</td>
</tr>
<tr>
<td>Consultation letters</td>
<td>Sent to those on the Local Plan mailing list</td>
</tr>
<tr>
<td></td>
<td>comprising specific consultation bodies, general consultation bodies, other organisations and individuals and landowners</td>
</tr>
<tr>
<td>WDC twitter feeds</td>
<td>Various news feeds throughout the consultation</td>
</tr>
</tbody>
</table>

### Local Plan, supporting documents and evidence base

- Waveney Local Plan Final Draft (Regulation 19)
- Policies maps
- Sustainability Appraisal Report
<table>
<thead>
<tr>
<th><strong>Consultation Statement</strong></th>
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<tbody>
<tr>
<td><strong>Habitat Regulations Assessment</strong></td>
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<td><strong>Equality Impact Assessment</strong></td>
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<td><strong>Duty to Cooperate Statement</strong></td>
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<tr>
<td><strong>Statement of Representations Procedure</strong></td>
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<tr>
<td><strong>Guidance Note on how to make a representation</strong></td>
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<tr>
<td><strong>Evidence base</strong></td>
</tr>
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