

## Matthew Payne

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**From:** Edward Gilder  
**Sent:** 27 June 2016 12:09  
**To:** WaveneyLocalPlan  
**Cc:**  
**Subject:** Kessingland Neighbourhood Plan

Please see below our comments of the Kessingland Neighbourhood Plan - submitted as required and as part of the formal consultation process

Badger Building presently hold an option to develop the former Ashley Nurseries site in Kessingland.

We welcome the proposal to allocate the land for development but we have some concerns about the detail.

There has been no recent contact between the Parish Council and the land owners about the proposals in the plan and the Parish Council, are we believe, unaware that we have an option on the site.

A discussion with the land owners and / or ourselves would have been a useful starting point in framing workable proposals for the site, rather than the construction of a wish list, which seems to be the present outcome.

The plan proposal presently proposes the construction of around 25 houses and 500sq m of starter units for business use.

A spatial analysis of the proposed starter units – assuming each to be around 56 sq m , or around the size of a double garage and around 9 such units, suggests that with parking both for occupiers and visitors and external storage for bins etc, the minimum space requirement would be around 0.22m. Leaving around 0.88sqm for housing. Any access road to the site is likely to be constructed to an adoptable standard to cope with the loadings from delivery vehicles and it would be necessary for the site to have a separate access from the road to avoid any conflict with the residential development. We do not see the two activities ie commercial and housing as being attractive neighbours.

We note the comment in the text that the quantity of affordable housing on the site may need to be reduced, to subsidise the development of the starter units.

In response we say:-

1. We would wish to see evidence of demand for such units for without evidence of demand, the imposition of this requirement on the site, is in our view unjustified.
2. We think it likely from the calculations that we have done, that a significant element of cross subsidy may be required to the extent that conventional affordable housing to rent may not be economic on the site.
3. It should not be a requirement of any planning permission that these units be constructed either in advance of or in parallel with the development of the site – this approach could lead to units sitting vacant and unwanted and unsuitable for any alternative future use. It should be sufficient that the land is set aside and properly marketed in the first instance to assess demand.
4. In the event that the balance of the site is around 0.88 sq m, given the impact of the new SUDS requirements for on-site disposal of surface water, we have some concern over the housing numbers proposed, if there is also an expectation for onsite provision of open space and an increase in the requirement for in plot parking spaces.
5. We note the requirement for improved connectivity of this site and the aspiration for both footpaths and cycleway links through the adjoining land at Laurel Farm. We have no control over the time scale for development on adjoining land. Whilst we are able to provide connectivity to our site boundary, it would be unreasonable to hold up development of the Nurseries site, pending development of adjacent land to provide the connectivity required.

6. In advance of further consideration of this site we would be happy to meet with the Parish Council and/or the district council to discuss the proposed development of the site .

Kind regards  
Edward

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