



Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan

Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan which was held between 1st September 2021 and 13th October 2021. The full representations were submitted to the Examiner for consideration during the Examination of the Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/lound-ashby-herringfleet-and-somerleyton-neighbourhood-area/

Respondent	Summary of representations
East Suffolk Council	<p>Paragraph numbers are missing in some places and some of the text is out of alignment.</p> <p>The last sentence of paragraph 5.3 does not seem to make sense: ‘Residential moorings are allocated by and also need to meet(?) the requirements of the Broads Authority’s Local Plan’</p> <p>Policy LAHS1 will carry full weight but it won’t do much to ensure that the size of dwellings and number of rooms are fixed in the determination of planning applications. This is due to a lack of evidence to support the need for smaller dwellings.</p> <p>Policy LAHS1 is entitled ‘Housing Mix’ but it includes reference to ‘scale’ which is a design matter that would be better dealt with in the design policies. Including it here is confusing and muddles the policy, but a simple re-wording could resolve this.</p> <p>Prior to Reg. 16 it was agreed with the Broads Authority and Neighbourhood Plan Group that the Design Guide should be considered by all new development proposals within the East Suffolk area but exclude those within the Broads Authority area. The following change (in red) to the wording is recommended. “Any further sites proposed in the future will be considered on their merits within the Neighbourhood Plan area, and with reference to the policies in the East Suffolk Council (Waveney) Local Plan, the</p>

	<p>Broads Authority Local Plan 2019 and the Lound and Somerleyton, Suffolk, Master-planning and Design Guidelines, AECOM, June 2019 (although the Design Guide relates to all new residential development in the Neighbourhood Plan area, excluding the Broads Authority Area, as stated in Policy LAHS 4 is related to allocated sites outside the Broads Authority area and s such this area has been excluded from the relevant policies LAHS4, LAHS5 and LAHS7).”</p> <p>The text in section 7.5 loosely supports policies LAHS3 and LAHS4. It should made clear the details in section 7.5 are not policy requirements.</p> <p>The supporting text for policy LAHS 3 and LAHS4 should have paragraph numbers.</p> <p>Paragraph 8.1.1 states “New developments will be expected to enhance biodiversity and mitigate against climate change”. More appropriate wording might be “mitigate the impact of climate change”.</p> <p>As worded the policy LAHS9 is not in conformity with the Waveney Local Plan policies WLP1.2 ‘Settlement Boundaries’, WLP8.13 ‘New Employment Development’, WLP8.15 ‘New Self Catering Tourist Accommodation’, WLP8.16 ‘New Hotels and Guest Houses’, and WLP8.18 ‘New Town Centre Use Development’.</p> <p>Terms used in the final supporting paragraph for policy LAHS9 such as ‘rural tourism and other businesses that will benefit the local economy’, and ‘locations that are sustainable’ are vague and the plan does not offer clarity or guidance on how these should be applied. Our concern is that this could potentially allow development of many different types of business and tourism uses throughout the neighbourhood area in a manner which is contrary to local and national planning policy.</p> <p>It is recommended that this policy should be made more precise in terms of what type of development is supported and in what location, and in doing so reflect local and national policy more strongly.</p>
<p>Broads Authority</p>	<p>LAHS9 seems to be contrary to policy WLP1.2 and WLP1.2 of the Waveney Local Plan. Development beyond the settlement boundaries could affect the setting of the Broads and relates to Basic Condition E as it does not seem to adequately reflect the Waveney Local Plan.</p>

<p>Policy LAHS1 does not give a real instruction or requirement. It is unclear what the policy will achieve.</p> <p>Paragraph 7.4.6 is unclear.</p> <p>Paragraph 7.5.7 seems to imply the design guide carries weight in decision making, despite it not being in the Plan and no policy wording to say the case.</p> <p>Is the last paragraph of policy LAHS4 requiring all applications to submit a design and access statement?</p> <p>Where is the site mentioned in paragraph 9.2.4 identified?</p> <p>Paragraph 9.3.1 talks of a location, but there is not policy or map.</p> <p>The following comments are factual changes that the Broads require to be made to the Neighbourhood Plan.</p> <ul style="list-style-type: none"> • Where is the OS licence for the maps used? • Paras 7.2.3 and 7.2.4 are repeated. • 7.3.1 this para should state that the design guide does not apply to the Broads. The Design Guide does not adequately assess the Broads and relevant documentation. The Neighbourhood Plan group are unable to change the document produced by AECOM. Should the guide be applied to the Broads, we would have had to object in relation to Basic Condition E. • The map on page 10 has a Neighbourhood Plan allocation shown. What is this? • Para 7.3.5 says: “(although the Design Guide is related to allocated sites outside the Broads Authority area and as such this area the Broads has been excluded from the relevant policies LAHS4, LAHS5 and LAHS7)”. Recommend the changes in yellow are made to make this part clearer. • LAHS3 says ‘Local Plan polices WLP8.23 (Protection of Open Space) of the East Suffolk (Waveney) Local Plan and DM7 (Open space on land, play space, sports fields and allotments) of the Broad Authority Local plan’. But this is a fragment of a sentence. Perhaps it needs to end with ‘are of relevance’? • Para 8.1 - and the lakeside areas at Lound Waterworks along with the Broads Authority executive area. <p>It is not clear how a Development Management Officer can use these statements as they are not in a policy:</p> <ul style="list-style-type: none"> • Section 7.5 – these seem requirements for designing development, but they are not in a policy. • Paragraph 7.4.6 seems to be an instruction, to include the community when designing schemes.

	<ul style="list-style-type: none"> • Section 8.1 – this has some criteria but they are not in a policy. • Section 8.5 – this seems to be policy wording, but it is not in a policy. How does this text differ to the Waveney and Broads Local Plans have policies on SuDS? <p>Page 16, wording under title LAHS3 does not have a para number and it is suggested they are added.</p> <p>The Neighbourhood Plan objectives aim to meet the needs of the whole community and attract younger people and enable the population to be more balanced, yet para 7.2.2 seems to imply schemes of under 10 dwellings are favoured though they would not trigger affordable housing policies.</p> <p>Para 8.3.4 – is there a school travel plan? Could that perhaps be an action or project for the group? We mentioned this at the Regulation 14 consultation.</p> <p>Section 9.1 and 9.2 and 9.3.2 to 9.3.8 and 9.4 and section 11 seem to be background information with no related policy. It is not clear what the intentions are for the information in these sections.</p> <p>In the Character Statement for Somerleyton Village does the term ‘Listed Landscape’ mean Registered Parks and Gardens or Protected Landscapes? If the latter, they could mention that the western end of the Conservation Area (CA) is within the Broads Authority Executive Area.</p> <p>In the Character Statement for Somerleyton Village para. 5.4 / 5.5 could some description of the marina and boatyard area, part of which is in the CA be provided in the ‘walk-through’ description of the CA?</p> <p>In the Character Statement for Somerleyton Village the views across the Waveney Valley should be more descriptive and make clear that these contribute positively to the conservation area.</p>
Historic England	Historic England do not consider it necessary provide further comments at Regulation 16 and refer you to any previously comments made at Regulation 14. They requested to be notified when the Neighbourhood Plan is made by the Planning Authority.
Natural England	They did not have any specific comments to make on the plan.
Norfolk County Council	They had no comments to make.

<p>Somerleyton Estate (Evolution Town Planning Ltd)</p>	<p>The representations were prepared on behalf the Somerleyton Estate, a significant employer and landowner in Somerleyton, Lound and Fritton. The Estate owns and runs Somerleyton Hall and Gardens, has a large farming operation based in Somerleyton and is involved in many local businesses.</p> <p>The Estate aims to develop attractive, environmentally exemplary housing and has two housing sites allocated in the Waveney Local Plan in the Somerleyton.</p> <p>The Estate supports the preparation of the Neighbourhood Plan and has worked with the Neighbourhood Plan Group for several years.</p> <p>They question whether stating a ‘preference’ in Policy LAHS1 for 1, 2 and 3 bedroom properties means that it is a Policy or an objective. They consider it important to have some 4 bed homes and that the Policy does not prevent development of these homes. 4 bed properties are needed for families that support the school and local businesses. It is suggested that the Policy could be amended to say that ‘more weight’ will be given to the provision of smaller homes rather than a preference.</p> <p>The AECOM work for the Design Guide and enclosed Concept Masterplans was carried out before any detailed site investigations were undertaken or before any detailed work on ecology, drainage, landscape design or detailed architectural work. Design Guide proposals have not been carried out with the rigour or range of professional input that would be required for a planning application. To meet the basic conditions, Neighbourhood Plans must have regard to the desirability of preserving any listed building or its setting; preserving or enhancing the character and appearance of any Conservation Area; and must contribute to achieving sustainable development. Policy LAHS2 should include flexibility to allow appropriate alternative designs can be considered.</p> <p>To meet the basic conditions, the Policy LAHS2 should be amended to state in each of the 3 bullet points (new words underlined and existing words crossed out): ...’should have regard to be in in conformity with the concept masterplan.....</p> <p>At the end of the Policy LAHS2 a new sentence should state: ‘Departures from the Concept Masterplan and Design Guidelines that equal or surpass the proposals in the Guide should be explained and agreed with the Local Planning Authority’.</p> <p>The Policy LAHS4 states that: ‘All new development will be expected to comply with the requirements of the Masterplanning and Design</p>
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	<p>Guides.’ There should be flexibility that allows alternative layouts and design where explained and justified. At the end of the Policy a new sentence should state: ‘If the design of the allocated sites changes from the Concept Masterplans and Design Guidelines this should be explained in any planning application and agreed with the Local Planning Authority’.</p> <p>Flexibility in applying the Design Guide would help in respect of site WLP 7.6 known as Mill Farm Field off The Street and Station Road in Somerleyton. Part 6.5 of the Design Guide describes retention of boundary hedgerows as ‘crucial’ and recognises the ecological benefits of retention. However, this would cut off any open space to the north of the site from The Street and be out of character with the village.</p> <p>A primary access route from the north is difficult to achieve and the Concept Masterplan shows a pedestrian and cycle link to The Street, not a primary access route. 6.5 of the Design Guide should indicated that there should be pedestrian and cycle access from The Street.</p> <p>To give the opportunity to create high quality developments, the introductions to the Lound and Somerleyton sections in paragraphs 5.1 and 6.1 should be amended as follows (new wording is underlined and deleted wording is crossed out): <i>...distinctive features which need to be reflected in future development <u>should have regard to</u>.....</i></p> <p>A new sentence should be added to the end of paragraphs 5.1 and 6.1 to state: <i>‘If needed departures from the Concept Masterplan and Design Guidelines can be permitted and should be justified and agreed with the Local Planning Authority.’</i></p> <p>To provide design flexibility bullet points 2, 6, 7 and 8 in paragraph 6.5 should be amended as follows.</p> <ul style="list-style-type: none"> • Creation of a green corridor along the southern boundary through the use of open space or suitable boundary treatments. • Natural surveillance of the public open space in the southern part of the site will be created by properties facing onto the space and creating active frontages. • If open space is located to the front of the development it should be set back from The Street to create a positively green frontage to the development. This allows the built form to positively relate to the existing houses along Morten Peto Close. • This site is adjacent to a mature woodland group beyond the eastern boundary along The Street and beyond the southern boundary. Development opposite the woodland to the south needs
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	<p>to have a positive relationship with the woodland and the design should incorporate open space or other landscape treatments to reflect this sensitive approach to the design.</p>
<p>Suffolk County Council (SCC)</p>	<p>SCC welcomes the changes made in responses to comments made at Reg.14.</p> <p>SCC note that during the Reg.14 consultation they recommended there is provision for a proportion of on-street parking for new developments. They note that due to the rural nature of village and limited public transport there is high car usage and instances of inconsiderate on-street parking. Some on-street parking is inevitable from visitors and well-designed and integrated on-street parking can help reduce inconsiderate parking on unsuitable roads, which restricts access for emergency services, refuse collections and farm machinery and hinder pedestrian access and safety.</p> <p>The parish could support sustainable transport for short trips by encouraging features such as safe and secure cycle parking spaces.</p> <p>SCC recommended the following additions to Policy LAHS 6: <i>“A proportion of visitor parking should be provided on-street within any new developments, but is well-designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility. Proposals should include provisions for safe and secure cycle storage, in accordance with adopted cycle parking standards.”</i></p> <p>SCC recommend that “configured location” is removed from Policy LAHS6 and the phrasing is clarified in the supporting text.</p> <p>SCC believe the plan could further encourage active and sustainable travel through requirements for safe access routes and secure cycle storage and parking within the villages, and this would help meet Objective EN1.</p> <p>SCC notes the parish council rejected suggested wording for policy LAHS8 provide at Reg.14. SCC consider the recently opened bicycle hire shop makes it logical to encourage sustainable transport and secure cycle parking in community locations. This would support Policy LAHS8 and make sites more appealing for small business owners as set out in Objective Econ4.</p> <p>SCC suggests the following wording is added to Policy LAHS 8 Support of Local Community Facilities in order to meet part a) of the Basic Conditions and be in conformity with paragraphs 85, 92, 106 part b), 104 and 112 part a) of the NPPF (version 2021):</p>

	<p><i>“Support will be given where facilities include provisions that encourage travel by active and sustainable modes of transport, such as safe access for walking and cycling, and secure cycle storage facilities.”</i></p> <p>SCC specifies that their comments are not issues concerning Basic Conditions, but made to suggest improvements for clarity, context, or ease of reading of the plan.</p> <p>Paragraph 9.3.9 has a repetition of the phrase “children’s play area in Lound”.</p> <p>SCC referred to their Ref.14 comment recommending the creation of a Policies Map to show policies in one clear consolidated image. SCC note it would provide context and clarity to the reader.</p>
<p>Susan Meeken</p>	<p>Ms Meeken found the Plan commendable and agreed with its contents and policies LAHS1-9 and wants to see the 30% affordable housing requirement delivered onsite.</p> <p>Ms Meeken acknowledges her main objection, the allocation of Mill Farm Field site, is beyond the remit of the Plan. She agrees with several comments made regarding the proposed density of the site that were published as part of a different consultation.</p> <p>Ms Meeken does not consider there are any similar developments of this density in the village. She notes the allocation seems to be based on government demands and doesn’t reflect local declining birth rates and employment opportunities. She also notes the history of village’s rail station and school and does not consider they make the village ‘large’. She considers the Local Plan site allocation at Mill Farm out of proportion and in danger of destroying the essential, unique character of the village.</p>
<p>Waveney, Lower Yare and Lothingland Internal Drainage Board (Waste Management Alliance)</p>	<p>The Neighbourhood Plan area is partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board’s Byelaws apply.</p> <p>They have no specific comments regarding the development of locations mentioned in Section 7.3 of the Plan but provide standard advice. All developments are recommended to supply a drainage strategy in line with the Planning Practice Guidance SuDS discharge location hierarchy.</p>