



# **Southwold Neighbourhood Plan 2020-2039**

**Made 23<sup>rd</sup> February 2022**

## **PREFACE**

The Southwold Neighbourhood Plan Working Group has been working on the Draft Neighbourhood Plan for six years. We have consulted widely with the community through drop-in sessions, focus groups and questionnaires. Our extensive research is summarised in the Appendices to the Draft Plan. Our approach was to identify the challenges facing Southwold, especially those which emerged from our 2016 Neighbourhood Plan questionnaires and contained in the 2013 Southwold Town Plan, and then develop policies to meet those challenges. The focus of the Neighbourhood Plan has to be on planning matters and it is essentially a supplement to the new Waveney Local Plan (2019).

**Cllr Michael Rowan-Robinson**  
**Chair, Southwold Neighbourhood Plan Working Group**

## **ACKNOWLEDGEMENTS**

We have benefited from advice from our consultant, Chris Bowden of Navigus Planning, and from Waveney District Council, East Suffolk Council and Suffolk County Council officers. We thank Megan Lloyd-Regan of Place Services for her work on the Character Area Assessments. We also thank the many members of the community who have contributed to the Plan.

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# INTRODUCTION

## Purpose of the Plan

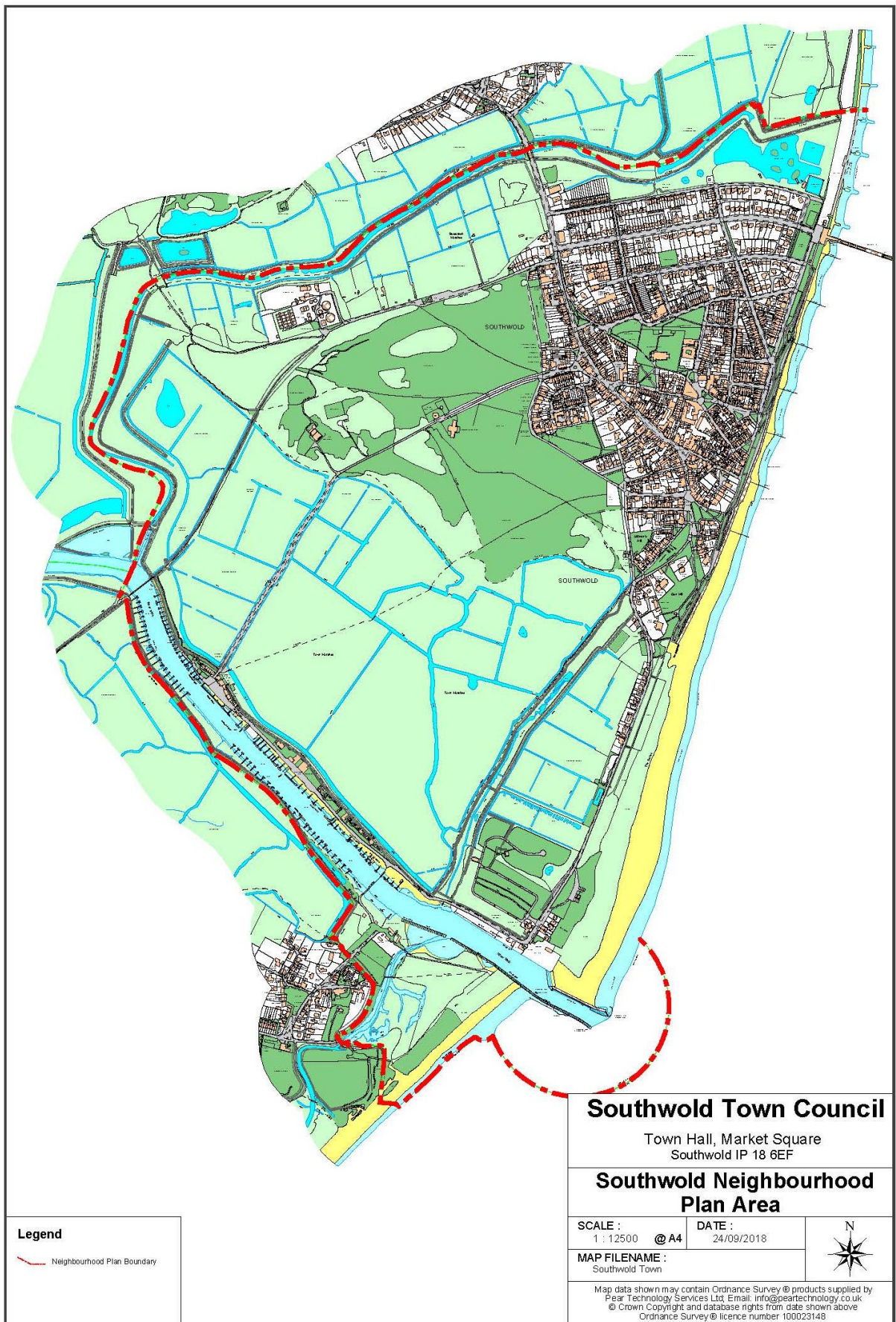
- 1.1 This document represents the Neighbourhood Plan for Southwold parish for the period 2020 to 2039. The Plan contains a vision for the future of Southwold and sets out clear planning policies to realise this vision.
- 1.2 Planning policies in the Neighbourhood Plan will become part of the development plan for Southwold parish and, along with the Waveney Local Plan 2019<sup>1</sup> (Local Plan), will be used by the local planning authority (East Suffolk Council) in the determination of planning applications within the Neighbourhood Area.<sup>2</sup>
- 1.3 The principal purpose of the Neighbourhood Plan is to guide development within the town. It also provides guidance to anyone wishing to submit a planning application for development within the town. The process of producing a plan has sought to involve the community as widely as possible. The different topic areas are reflective of matters that are of considerable importance to Southwold, its residents, businesses and community groups.
- 1.4 Some of the Neighbourhood Plan policies are general and apply throughout the Plan area, while others are site or area-specific and apply only to the appropriate areas illustrated on the relevant maps. Nevertheless, in considering proposals for development, the Town Council and East Suffolk Council will apply all relevant policies of the development plan. It is therefore assumed that the Neighbourhood Plan will be read as a whole, although some cross-referencing of policies within the Plan has been provided to assist the reader.
- 1.5 The process of producing the Neighbourhood Plan has identified a number of actions which have not been included in the policy sections and these can be found in Section 11. This is because these are not specifically related to land use matters and therefore sit outside the jurisdiction of a Neighbourhood Plan. These actions will be addressed by the Town Council outside the Neighbourhood Plan process.
- 1.6 East Suffolk Council, as the local planning authority, designated a Neighbourhood Area for the whole of the Southwold area in May 2015 to enable Southwold Town Council to prepare the Neighbourhood Plan. The Plan has been prepared by the community through the Southwold Neighbourhood Plan (SNP) Team.
- 1.7 The boundary of the Neighbourhood Plan area is contiguous with the boundary of Southwold parish. (see *Figure 1.1*)

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<sup>1</sup> <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/>

<sup>2</sup> Southwold is located within the former Waveney District Council area; in April 2019, Waveney District Council merged with Suffolk Coastal District Council to form the new East Suffolk Council. The two former districts have separate Local Plans.

**Figure 1.1: Southwold Neighbourhood Plan area boundary**



## Policy Context

1.8 The National Planning Policy Framework<sup>3</sup> (NPPF) states:

“28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies<sup>16</sup>.

30. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.”

1.9 The Local Plan, which was adopted on 20 March 2019, is up to date and consistent with the January 2019 edition of the NPPF. The Local Plan provides a clear strategic context for the Southwold Neighbourhood Plan (SNP), which takes account of the policies in the Local Plan.

## Consultation

1.10 The Southwold Neighbourhood Plan Team has developed the Neighbourhood Plan through extensive engagement with the community.

1.11 The decision to create a Southwold Neighbourhood Plan grew out of the Southwold Town Plan (October 2013), a community-led initiative that recommended the town should have a Neighbourhood Plan. Southwold Town Council (STC) accepted this recommendation and established a Neighbourhood Plan Team (NPT). Between September 2014 and November 2018, the NPT consulted with the community through drop-in events, a public meeting, questionnaires, focus groups and interviews. This lengthy period of consultation included hiatuses for analysis and evidence gathering and drafting and re-drafting context and policies. Besides using data produced by other bodies, the NPT conducted its own research on a range of issues related to the community's concerns. This included a 2016 street by street survey of all buildings in Southwold to determine their use. A map showing the results of the survey has been produced with the different uses of the buildings colour-coded. (*See section 15.1*) The Regulation 14 consultation produced many helpful representations that enabled us to use the opportunities created by changes in the planning ‘toolkit’ (the 2019 versions of the NPPF and Waveney Local Plan, case law, and Planning Appeal decisions) to produce a Neighbourhood Plan Proposal that closely aligns with the community's aspirations.

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<sup>3</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

## 2. LOCAL CONTEXT

### History of Southwold

- 2.1 The town of Southwold sits on the stunning Suffolk coast. Its environment is of the highest quality, being part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast. The town covers 263 hectares but its settlement boundary is much smaller – only about 18% of the land in the parish. The majority of the land within the town’s boundaries is an open landscape created by the Common, Buss Creek, dykes, marshes, the River Blyth, the beach, the dunes and the North Sea. This landscape has striking views and is rich in wildlife habitat. Much of it is designated as a Site of Special Scientific Interest (SSSI) or County Wildlife Area. Visitors come to the town to enjoy this landscape, which is also prized by the residents of Southwold.
- 2.2 Southwold lies adjacent to neighbouring Reydon; the two settlements are separated only by Buss Creek and a short distance of green open space. Although the two settlements have distinct identities, they are increasingly inter-dependent. Southwold provides services, jobs, open leisure space and other amenities for Reydon residents whilst Reydon provides a greater choice of housing and lower house prices for people with an attachment to Southwold, as well as volunteers for Southwold events, civic groups and charities<sup>4</sup>. Reydon also provides essential services such as residential homes, the GP surgery, fire station, and a business park. Outside the tourism season, Southwold’s High Street is more dependent on custom from Reydon and the adjoining parishes. Reydon Parish Council are also developing a Neighbourhood Plan and we have benefited from seeing an early draft of this.
- 2.3 The small built area of Southwold town has a wealth of archaeological and built heritage assets. The Suffolk Heritage Explorer lists over 90 entries on archaeology in the town. The town has 143 listed buildings and two-thirds of it is designated as a Conservation Area with an Article 4 Direction restricting permitted development rights.
- 2.4 Southwold’s urban design is vital to its distinctive character. The density in the Conservation Area is high. Consequently, with so many significant buildings clustered together, any development, even applications for minor works such as the addition of gables and dormers, porches, rear extensions and raising of roofs may cause harm to its built heritage and ultimately erode what makes Southwold so special.
- 2.5 Alongside the density of its buildings, Southwold is a town with many alleyways and paths, hidden courtyards and tucked away gardens. These may not be visible from the street but they can be seen from the windows of adjoining buildings and alleys and footpaths. Each of these spaces is part of Southwold’s endearing character, and creates a sense of openness within its dense urban fabric.
- 2.6 There are also numerous green spaces around the town. These range from the mown grass of South Green, Constitution Hill, and Skillman’s Hill to the public gardens of North Parade, the semi-wild churchyard of St. Edmunds the Martyr, Ladies’ Walk planted with wild flowers, the Common and marshes, and numerous other green spaces and verges. In addition, there are a number of private gardens identified in the Conservation Area Appraisal and in the Neighbourhood Plan Character Area Appraisal that are of special note, and merit protection. In total, all of these green spaces

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<sup>4</sup> In 2018, the average house price in Southwold was £542,000 compared to £326,750 in Reydon. – SNP Supporting Documents - Section 7

contribute to a sense of openness and peacefulness that is an essential quality of Southwold's character.

- 2.7 Southwold has been shaped by bursts of development in different periods; this results in different styles of building from different eras sitting side-by-side. Until the 1970s, it was a town in which trades, manufacturing, shops, and residences were mingled together. For example, in the first part of the 19<sup>th</sup> century, grand villas for the local gentry were built on South Green facing the sea but they backed onto humbler buildings on South Green and Constitution Hill that included a pub, a baker, a cobbler, fishermen's cottages, a school, a department store. The result is a mixture of buildings, each working with the other, which is part of what creates Southwold's charm and its character. Southwold is not a town which has a uniformity of character, even within individual streets.
- 2.8 As any resident or visitor will attest, Southwold is a town for walking. It is compact and level and much pleasure is obtained from strolling its streets and footpaths and observing the variety of its heritage assets, its front gardens, green spaces and views.
- 2.9 The street scene as well as the beautiful environment and the coast is part of what makes Southwold such a popular place to visit.
- 2.10 At one time, visitors to Southwold stayed in hotels, bed and breakfast accommodation or as guests in private homes. Now, there are only three hotels and one bed and breakfast. Most people stay in self-catering accommodation or in second homes. The increase in the number of properties being bought to rent as holiday lets or as second homes has transformed the character of the town and substantially reduced the stock of residential property that is affordable to local residents, whether to buy or rent. This is a primary reason for Southwold's demographic imbalance – the lack of families and younger people living in the town.
- 2.11 Because of the natural barriers of sea, rivers and marshes and the sensitive environment, the Local Plan rightly restricts further extension of the settlement boundary for development. This means that it is not possible for Southwold to build its way out of demographic decline by creating significant amounts of new affordable housing to attract younger people and families into the town. The outcome is a shrinking and ageing population, which the Southwold Town Strategy 2019<sup>5</sup> identified as a clear weakness of the parish.
- 2.12 Tourism represents the largest part of the economy of Southwold, which has seen a decline in economic activities that were predominant in previous generations (e.g. fishing and small manufacturing). The largest employer in the town is the Adnams brewery and distillery, whose distribution centre is in Reydon. Apart from this, most employment is directly or indirectly related to tourism.
- 2.13 The Southwold Town Strategy identifies over-reliance on tourism as an economic vulnerability – tourism is a seasonal and low wage sector of the economy. Moreover, tourism is subject to fads and fashions and unpredictable events, including natural or man-made disasters or interventions.
- 2.14 Manmade interventions create potential risks for the tourism economy, for example through construction disruptions (especially traffic congestion on the A12, which links Southwold to the rest of the country) associated with the proposed building of two new

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<sup>5</sup> *Southwold Town Council (2019) A Strategy for Southwold -- SNP Supporting Documents - Section 3*



nuclear reactors at Sizewell C<sup>6</sup>. The visibility of new windfarms in good weather will alter the character of the Heritage Coast, with unknown implications for Southwold's attractiveness as a tourism destination.

- 2.15 However, Sizewell C could also present an opportunity to reverse Southwold's demographic decline. Even before its planning application was filed, local estate agents were reporting requests from Sizewell employees, who are moving to East Suffolk from distant locations, for family homes to rent in Southwold. To the extent that the Neighbourhood Plan policy on holiday letting aims to convert housing stock back to full time rental, this will help to satisfy any demand for housing created by Sizewell C's construction as well as bringing working families into the town.
- 2.16 Historically, Southwold's High Street has had many independent shops and this, again, has been one of its attractions both to local people and to visitors. However, high land values have led to an increase in commercial rents and rates. This, coupled with the enlargement of high street shops through extensions into back gardens and courtyards, has resulted in an increase in the number of national chains. One of the consequences is to reduce local employment from local supply chains. It also homogenises Southwold's unique character.
- 2.17 Historically, council housing has not only been an important source of homes for people, it is as important to the character of Southwold as the villas of South Green. Southwold Borough Council (dissolved in 1974 when local government was reorganised and the former Waveney District Council took over the Borough's functions) was one of the most progressive in the country. The Corporation (as the Borough Council was then known) was the town's largest landowner thanks to the bequest of William Godyll, who left his estate covering most of the land in the town to its governing body upon his death in 1504. Between 1903 and 1974, Southwold Borough Council built more than 150 houses on land that it owned north of St Edmunds Church, and on Station Road and Blyth Road. When it ran out of land in Southwold, it built more housing in Reydon. It also purchased two and three-storey properties as they came onto the market in Southwold, and converted them into flats. This housing is mostly of good quality design, reflecting the taste of the era when it was built, and many of the houses have generous gardens either in front or back or sometimes both. Some of these gardens are still used for fish ponds, raising chickens, and growing fruit and vegetables.
- 2.18 With limited public transport serving Southwold (there are day-time bus services to Halesworth, Beccles, Lowestoft and Norwich), most people come to the town by car. The historic layout of most of the town means that its small streets are not designed for car use, which makes on-street parking a particular issue. This problem is being exacerbated by investment in houses that are converted to holiday lets and enlarged to accommodate multiple family units in order to maximise revenue without adequate on-site car parking provision. An unintended consequence is an increase in the number of cars associated with each holiday let, often in areas of town with limited on street parking. This leads to competition with residents and people working in the town for parking spaces, and causes anti-social parking on green spaces or prescribed

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<sup>6</sup> *The Energy Coast-Implications, Impacts and Opportunities for Tourism on the Suffolk Coast*  
<https://www.thesuffolkcoast.co.uk/tourism-research-and-reports/>; <https://www.eastsuffolk.gov.uk/2019/councils-remain-deeply-concerned-about-the-impact-of-coastal-energy-projects/>

areas of streets. For day-trippers and other visitors there are car parks around the town.

- 2.19 Parking is a vexing problem for everyone living and working in or visiting the town. The Town Council is working with East Suffolk Council and other stakeholders on a strategy to manage better Southwold's parking problem. There are also well progressed plans for a new year-round visitor car park on the Millennium Field at the entrance to Southwold.
- 2.20 At the same time, a balance needs to be struck between ensuring there is sufficient parking for visitors, and surrounding the town with car parks and converting gardens for car parking. The latter would generate more cars coming into the town and threaten the distinct character of Southwold's built and natural environment and undermine high quality design and biodiversity.
- 2.21 In 2019, Southwold Town Council joined East Suffolk Council and Suffolk County Council in declaring a Climate Emergency. Southwold's commitment to reducing and redressing carbon emissions is a thread running through all of its Neighbourhood Plan policies. Vehicle emissions are an important contributor to climate change; reducing them is at the heart of Southwold Town Council's efforts to mitigate climate change. Therefore, when considering the Neighbourhood Plan's policies, the SNP gives strong weight to reducing car dependency and preserving and enhancing natural habitat and protecting the character and feel of the town.

## **Profile of the Community Today**

- 2.22 Unless stated otherwise, the profile of the community has come from the 2011 Census<sup>7</sup>.

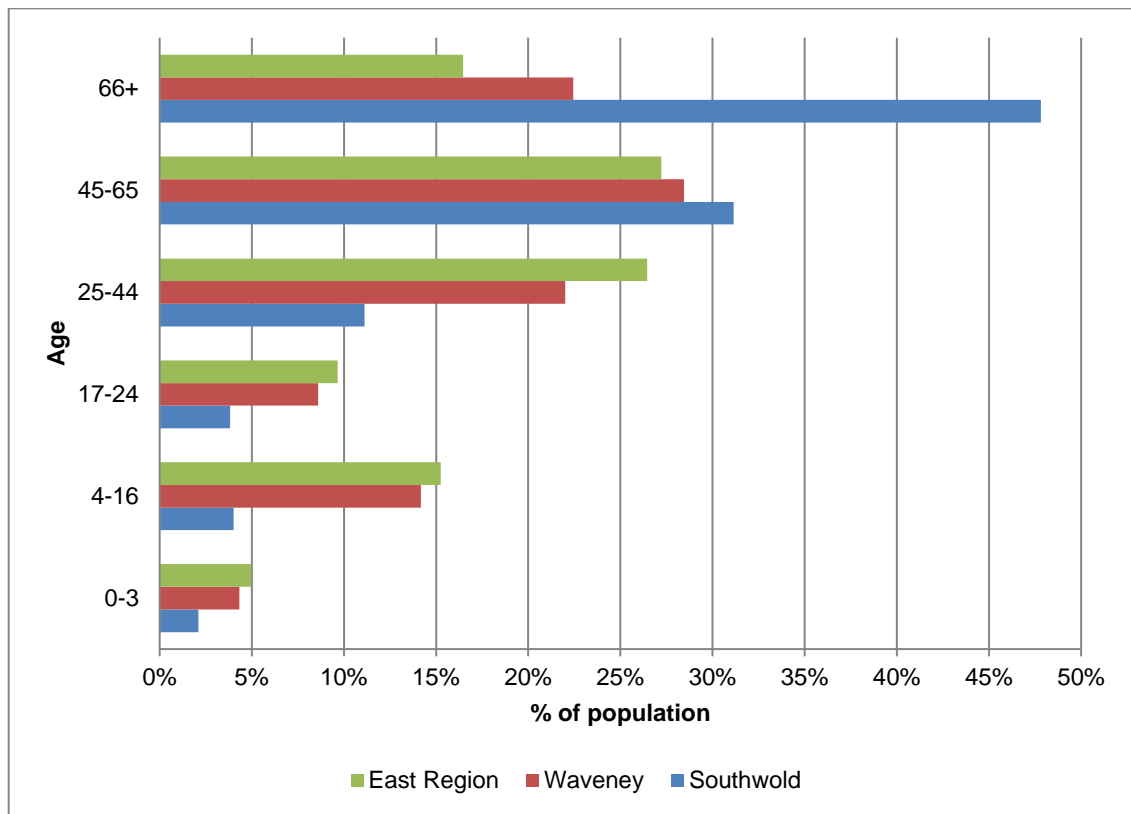
### **Population**

- 2.23 According to the 2011 census, the population of the parish was 1,098 persons. Southwold has more than double the proportion of people of retirement age than the former Waveney District and the East of England region: nearly 50% of its population was 65 or older compared with 22% in the former Waveney District and 16% in the region. It also has substantially fewer children (6% aged 16 and under) and young adults (15% aged 17 to 44) when compared with the former Waveney District (18% and 31% respectively) and the region (20% and 36% respectively). (See *Figure 2.1*)

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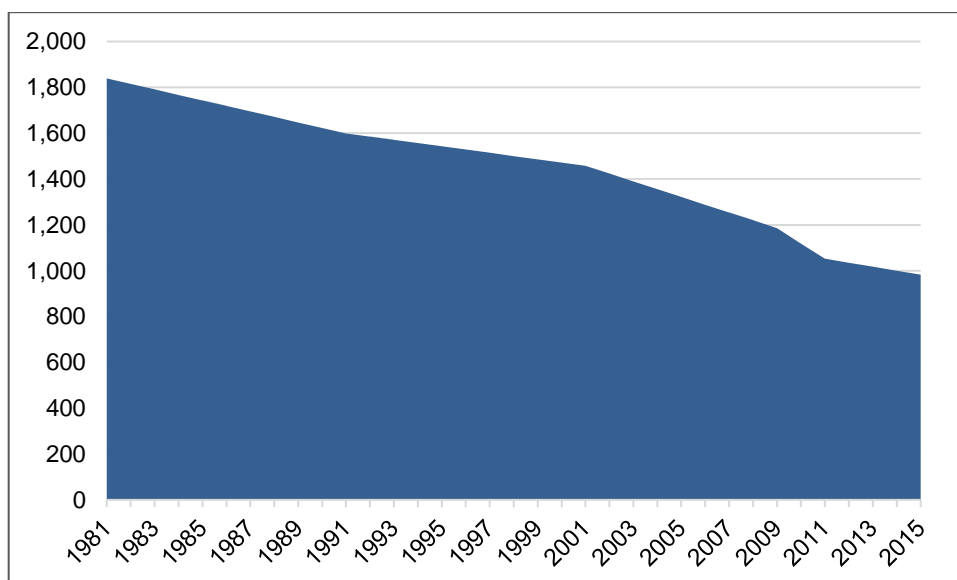
<sup>7</sup> – SNP Supporting Documents – Sections 1 and 2

**Figure 2.1: Population profile, 2011**



2.24 The town's population fell from 1,839 in 1981 to 1098 in 2011. The projected population for 2016 was 981<sup>8</sup>. (See Figure 2.2)

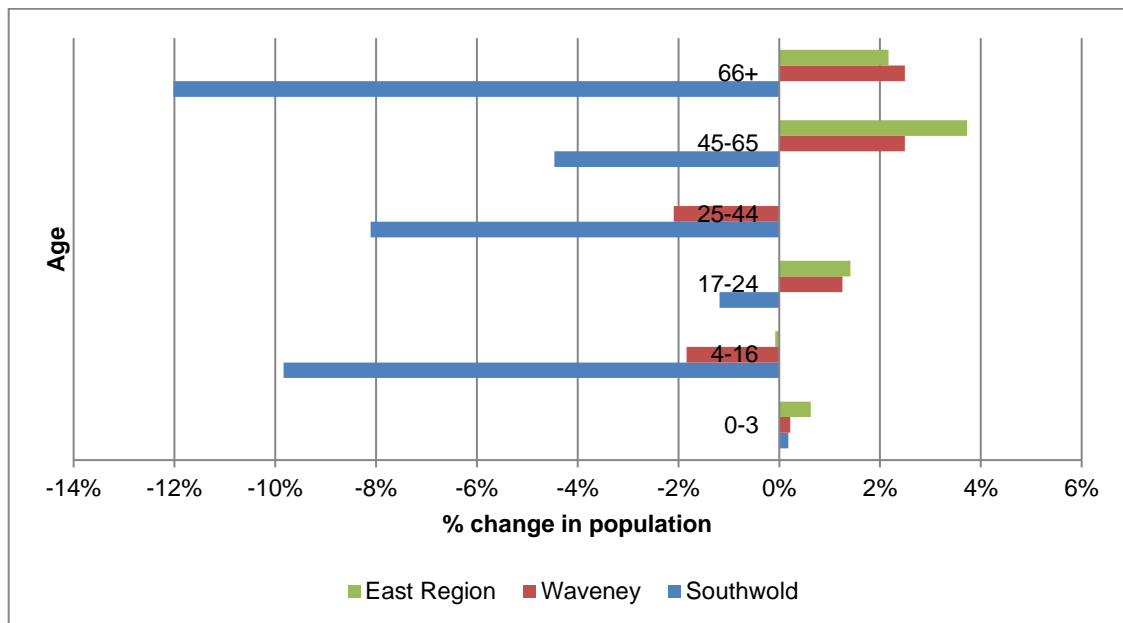
**Figure 2.2: Population decline 1981 – 2016**



<sup>8</sup> Census data and Suffolk Observatory

2.25 Since 2001, the population of the parish has fallen by 389 persons, or 35%. Southwold has seen a decline across almost all age groups. In contrast, both the district and region have seen net growth across the equivalent age groups. (See Figure 2.3)

**Figure 2.3: Change in population, 2001-2011**



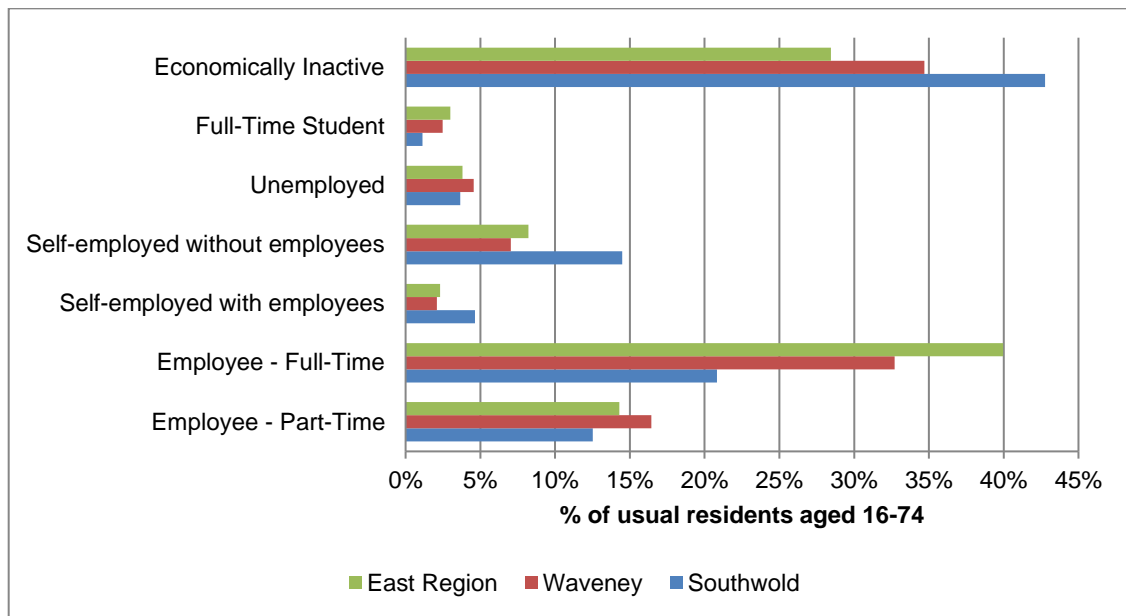
**Work**

2.26 The proportion of Southwold’s population of working age (16 to 74) in self-employment is 19%. This is significantly higher than the rest of the former Waveney District (9%) and the region (11%).

2.27 A third (33%) of Southwold’s population is in full time or part time employment. This is very low compared with the former Waveney District and the region.

2.28 The economically inactive proportion of Southwold’s population (43%) is high compared with that of the former Waveney District (35%) and the region (28%). This reflects the high proportion of retirees. (See Figure 2.4)

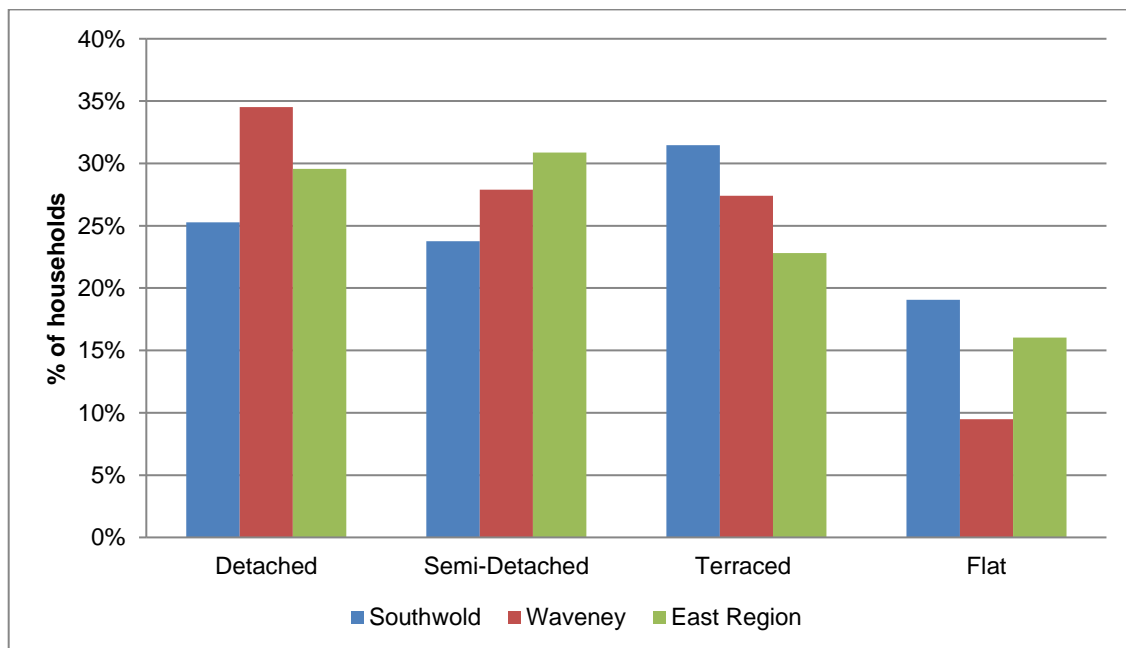
**Figure 2.4: Economic activity, 2011**



**Housing**

2.29 Reflecting the historical pattern of development, discussed in the Neighbourhood Plan Character Area Assessment<sup>9</sup>, Southwold’s housing is varied. Terraces and flats represent 51% of the housing stock. This is higher than in the former Waveney District and the region, at 37% and 39% respectively. By contrast Southwold has a low proportion of detached (25%) and semi-detached (24%) housing. (See Figure 2.5)

**Figure 2.5: Type of dwelling**



<sup>9</sup> See Section 13

2.30 Compared with the former Waveney District and the region, Southwold has a higher proportion of one- and two-bedroom properties, a smaller number of detached properties, and a higher number of properties with at least five bedrooms. (See Figure 2.6)

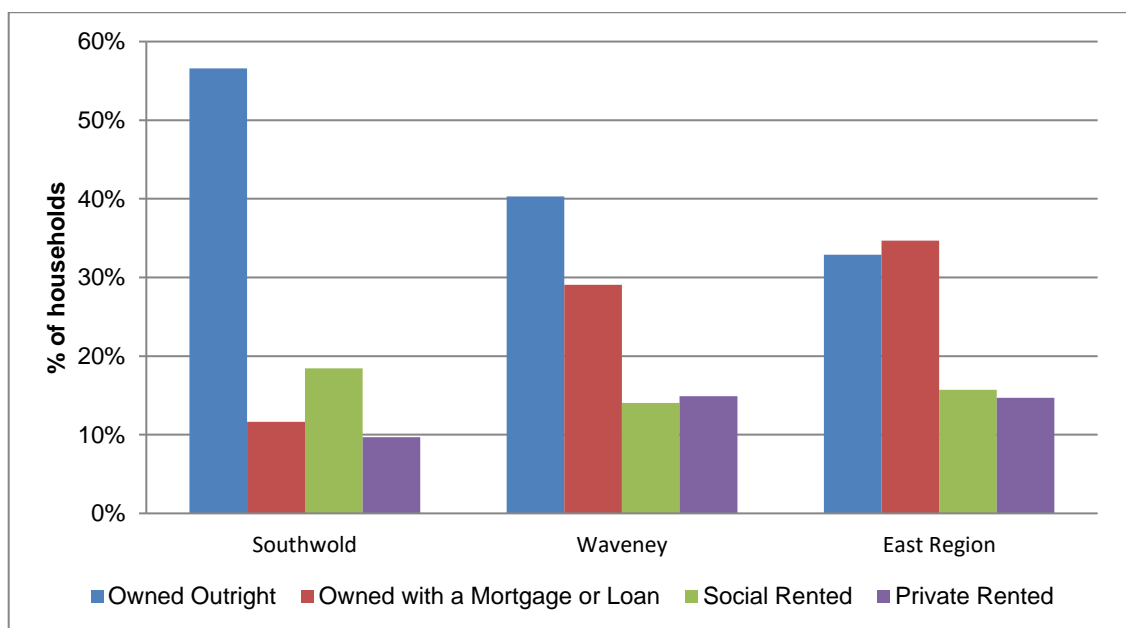
**Figure 2.6: Number of bedrooms**



2.31 Only 9% of the housing stock is available for private rental. This makes it difficult for people on average wages for the region to find full time rental accommodation in Southwold through the private market.

2.32 The full time rental sector is chiefly through councils and housing associations, which is 18% of the total housing stock. (See Figure 2.7) This is higher than the former Waveney District and the rest of the region because of the legacy of Southwold Borough Council's progressive policy of investing in house building that began at the turn of the 20<sup>th</sup> century.

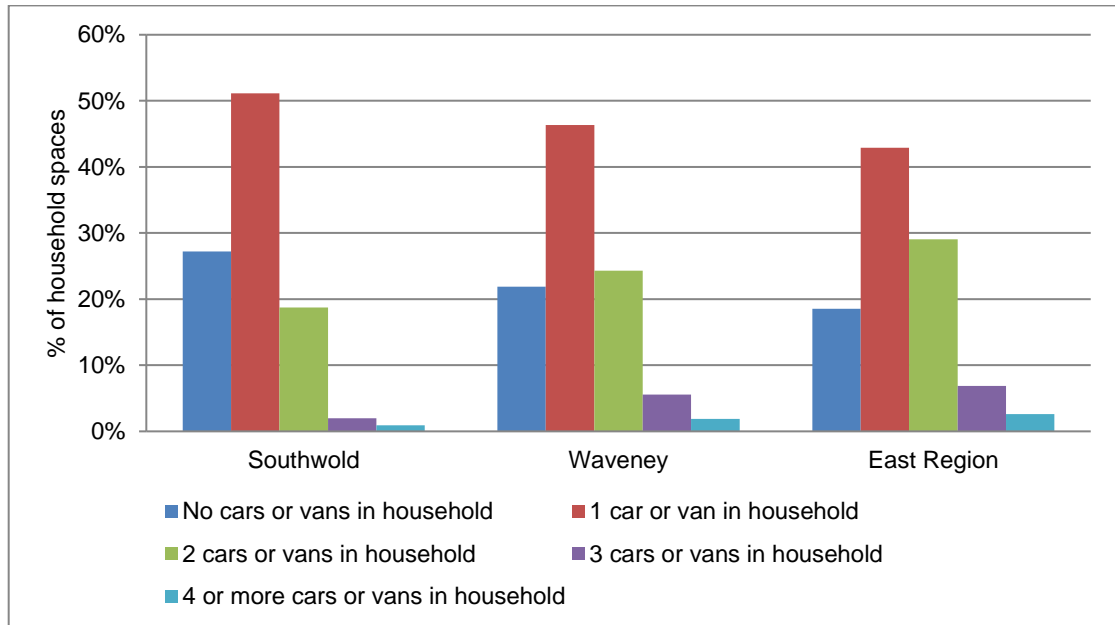
**Figure 2.7: Ownership profile**



## Cars and Travel

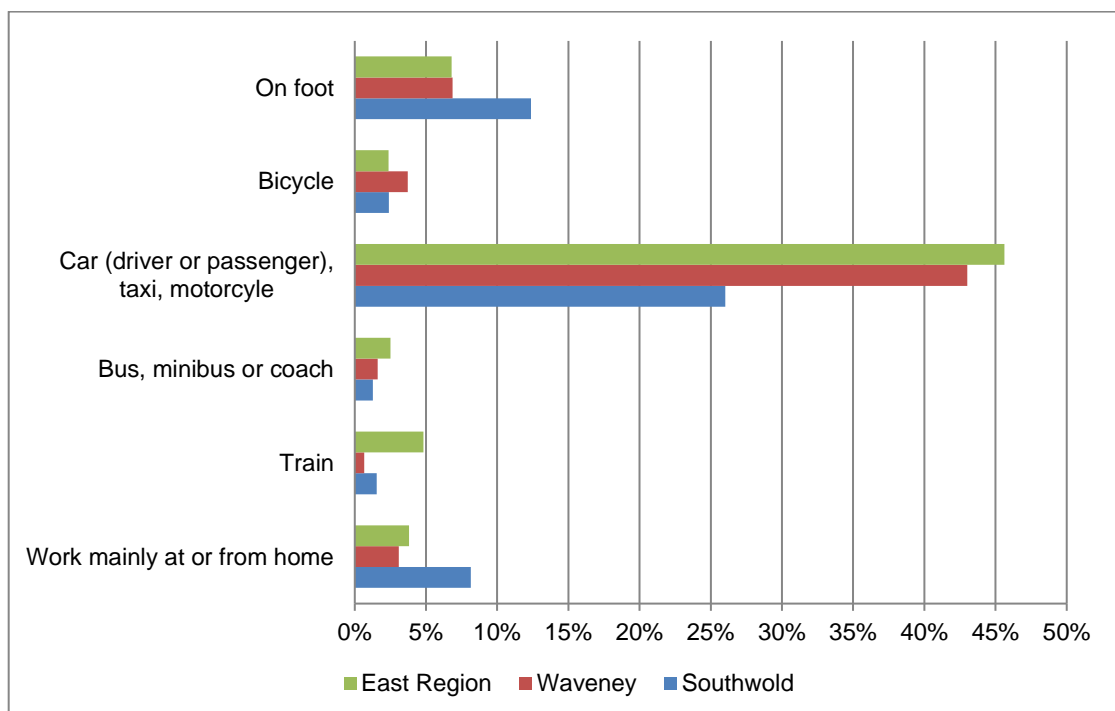
2.33 27% of the households in Southwold have no car or van available for travel, which is higher than that of the former Waveney District (22%) and the region (19%). 51% have access to one car or van. This is higher compared with the former Waveney District at 46% and the region at 43% (See Figure 2.8)

**Figure 2.8: Car or van availability**



2.34 A comparatively high proportion of Southwold's working age population travel to work on foot (12% compared with 7% across both the district and region). The number of people working at or from home in Southwold (8%) is also more than that of the former Waveney District and the region. (See Figure 2.9) This reflects the high proportion of people that are self-employed.

**Figure 2.9: Mode of travel to work**



### **3 VISION AND OBJECTIVES**

#### **Challenges for Southwold**

3.1 The Neighbourhood Plan seeks to address, as far as is possible, the challenges that face the community of Southwold. In summary these challenges are:

- Ensuring that all development is of high quality design, and at an appropriate density that reflects the local character of Southwold.
- The limited number of residential properties that are affordable to local residents and those who work in Southwold and the local area.
- The reliance on tourism; this leads to a fluctuating seasonal population. This has adverse consequences for High Street traders, especially the independent shops.
- Southwold's declining and increasingly elderly population.
- Provision of dwellings suitable and affordable to younger people and families, enabling a wider range of people of all ages to live in the town.
- The limited availability of on-street car parking in certain areas of the town which leads to anti-social parking.
- The lack of employment opportunities and suitable premises for growing businesses, start-up businesses and micro- and small businesses.
- Protecting existing community services and providing for their changing needs, as well as providing for new community services.
- Maximising the potential reuse of existing built assets and land for the benefit of the wider community.
- Protecting the sensitive natural environment for the benefit of residents, tourists and future generations.
- Ensuring that residential and employee parking problems are not worsened.

#### **Vision for Southwold**

3.2 In consultation with the community, the established vision for Southwold in 2040 is:

- Southwold looks the place it has always been – a charming and seemingly unchanging town situated in a beautiful natural environment. Visitors still come from near and far but Southwold's identity is no longer exclusively defined by tourism nor is it seen only as a place to retire.
- Attracted by the availability of flexible, affordable, and digitally connected work space, younger people have moved into Southwold or into the surrounding parishes, where housing is less expensive. The new population has brought with it a range of interests and skills. Start-up companies and expanding businesses help to bring year-round vibrancy to the High Street. Independent businesses are flourishing in a new employment centre in Station Yard and in the Old Hospital Hub. New and improved community facilities make Southwold an attractive place for families to raise children. A new generation of volunteers continues Southwold's tradition of a strong and caring community.



- 3.3 As a result, Southwold has become a vibrant year round community, making the town an even better place to live, work and visit. It has achieved this by:
- Protecting the town's historic identity and exceptional landscape by ensuring that all development delivers high quality design that preserves the best features of the local character.
  - Increasing the number and diversity of its full time resident population by:
    - building more affordable housing;
    - requiring all new dwellings (except for one-for-one replacements) to be occupied as principal residences;
    - reducing the number of homes used for holiday letting, and increasing the number of houses available for full-time rental.
  - Encouraging self-employment, start-up businesses and the expansion of existing businesses by providing sufficient suitable work space.
  - Preserving and creating space for community facilities to respond to the changing needs of Southwold and adjoining parishes.
  - Ensuring that residential development does not contribute to parking congestion so that there is adequate parking space for residents, employees, and users of Southwold's shops, businesses and community facilities, as well as for visitors
  - Developing the Harbour, the Blyth Estuary, and the Harbour Lands to ensure a long term future for these for the benefit of residents and visitors.

No single strategy is a silver bullet – it is their combination that will help to regenerate Southwold.

### **Neighbourhood Plan Objectives**

- 3.4 The objectives of the Neighbourhood Plan, as identified through engagement with the community, are as follows:
- to restrict the loss of dwellings to second home ownership and holiday lets so that Southwold can be a place where people live and work;
  - ensure that the stock of affordable housing and homes for market rental is increased;
  - ensure development is of a high quality of design that responds appropriately to the local character;
  - grow and diversify the local economy by providing work space for solo workers, start-up and growing businesses;
  - protect existing community services and provide space for changing community needs;
  - maximise the potential reuse of existing built assets and land for the benefit of the wider community;
  - protect the sensitive natural environment and exceptional landscape surrounding Southwold; and
  - ensure that residential parking problems are not worsened.

Southwold Town Council will monitor the impact of the Neighbourhood Plan and will review the Plan at regular intervals.

## 4. HOUSING

4.1 The Southwold Neighbourhood Plan’s vision is to increase and diversify the town’s full time population with more young people, more working people and more families. This is challenging due to a number of constraints affecting Southwold’s housing market. The Neighbourhood Plan has five housing policies designed to over-come these constraints so as to enable the community to achieve its vision.

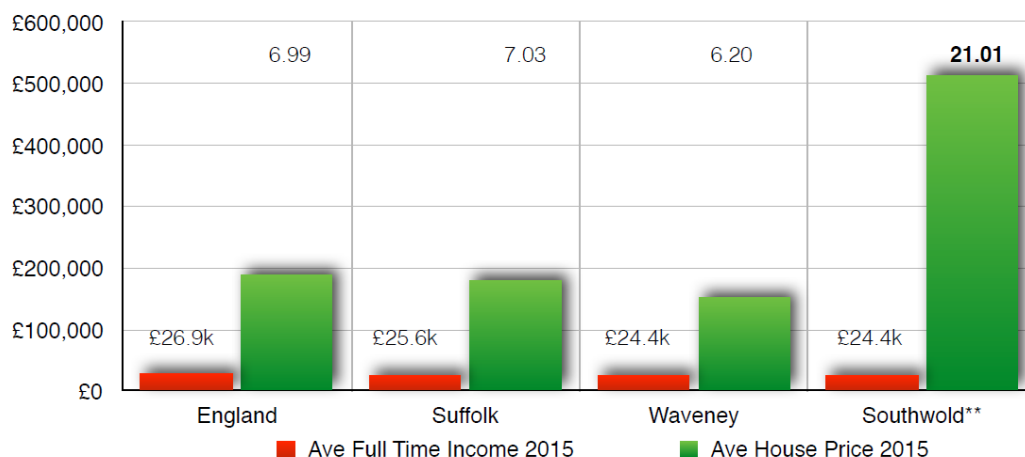
### Constraints

4.2 Southwold is a small coastal town of just over 1,400 dwellings.<sup>10</sup> However, only about 40% of this housing stock is actually lived in by full time residents.<sup>11</sup> In the main, these full time residents are elderly or very elderly.<sup>12</sup> The town’s remaining housing stock is occupied as second homes or used for holiday letting.

4.3 Driven by Southwold’s popularity as a tourism destination, house prices are the highest in the Local Plan area (the former Waveney District) and unaffordable to local people.

- In 2018, the average house price in Southwold was £542,000 with the average flat costing £335,250.
- In 2015 the price of the average property was more than 21 times the average earnings of a Southwold resident. This compares to 7.03 for Suffolk.<sup>13</sup> (See Figure 4.1)

**Figure 4.1: House price/earnings ratio, 2015**



4.4 Given the profitability of holiday letting compared to long term lets, Southwold has little in the way of full time market rental property. According to a leading estate agent in the town, any residential lettings that do come onto the Southwold market “instantly

<sup>10</sup> Figure for 2012; Southwold and Reydon Society Housing Report (2012)

<sup>11</sup> See Paragraph 4.25

<sup>12</sup> According to the Office for National Statistics (ONS), which analysed the age composition of 274 coastal communities, Southwold has the highest proportion of its population aged over 65 years, 50%, and the highest average age, 65, in the whole of England and Wales: ONS (2014) 2011 Census: Coastal Communities. <http://webarchive.nationalarchives.gov.uk/20160107113925/http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/coastal-communities/index.html>

<sup>13</sup> ONS and Land Registry. Southwold’s full time income is assumed to be similar to the Waveney District Council area.

*gain huge interest”, with over ten applicants per property advertised. The agent also advises that “residential rentals within Southwold generally obtain 20% - 25% higher rental income than similar properties within Reydon and other local villages.”<sup>14</sup>*

- 4.5 Whilst the need to build more affordable housing is clear, finding development sites is a formidable obstacle. Southwold’s geography, a densely developed hillock surrounded by water and marshland, means that future land for development within its settlement boundary can only be released on brownfield sites. Chiefly, these sites will consist of land currently used for community facilities or employment.<sup>15</sup>
- 4.6 The option of building on rural exception sites is excluded; the only suitable site for such development (on Blyth Road) has already been built out with a scheme of four permanently affordable houses delivered in 2015 by Hastoe Housing Association.
- 4.7 Along with lack of land for development, the high price of land with residential planning permission -- approximately 1,500% higher than in the rest of the Waveney Area – is a further barrier to developing housing that meets local needs.<sup>16</sup>
- 4.8 Delivery of most affordable housing in England and Wales is developer-led, but this is not possible in Southwold because the vast majority of sites are small. Looking to the future, there are only two sites in the town that could potentially come forward that are large enough to generate the Local Plan’s 40% requirement for affordable housing on planning schemes for 11 or more units.<sup>17</sup>
- 4.9 The final constraint is the fact that although Southwold is a small rural market town with only about 800 full time residents (based on the 2020 electoral role), the town is not a Designated Protection Area (DPA). Consequently, as affordable housing is built, it is being lost through the right to buy/acquire and stair casing of shared ownership to 100% equity, without there being a supply of land to replace it. An example of this is Tibby’s Triangle, completed in 2013, built on the site of the former Adnams’ distribution centre. It provided 38 houses with ten shared ownership homes. Less than 10 years later, 90% of the affordable units are second homes and holiday lets.<sup>18</sup> East Suffolk Council has tried to obtain DPA status for Southwold, without success.<sup>19</sup>
- 4.10 East Suffolk Council has advised that Community Led Housing (CLH) is the only vehicle empowered to build permanently affordable dwellings for the full range of housing tenures. In light of this advice and the above constraints, policies SWD1-3 support the provision of sites for CLH groups to build affordable housing. These policies have been drafted in accordance with a “Planner’s Guide to Community Led Housing” (2019). Policies SWD1-3 are vital to achieving the community’s vision for its future.<sup>20</sup> Indeed, they provide the only realistic solution within the Neighbourhood Plan area to realising the Waveney Local Plan’s vision for Southwold: by 2036, *“new housing growth in the area will have provided homes with a range of tenures and will have made homes more affordable for those working in the area.”*

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<sup>14</sup> SNP Supporting Documents – Section 14.,

<sup>15</sup> Since 2010, the only new housing developments in excess of one unit have been built on the former Adnams Distribution Centre (Tibby’s Triangle), the former British Legion building, the former Southwold Service Station; the former Duncan’s builder’s yard. New housing development is in progress at the former community hospital site and is planned for the former fire station site.

<sup>16</sup> SNP Supporting Documents – Section 11

<sup>17</sup> The BT Exchange on Station Road and the Southwold Business Centre

<sup>18</sup> HLIN Case Study 71, 2013, P. 2 <https://www.housinglin.org.uk/Topics/type/Tibbys-Triangle-in-Southwold/>

<sup>19</sup> SNP Supporting Documents - Section 12.

<sup>20</sup> SNP Supporting Documents – Section 16.

## Affordable Housing Need in Southwold and CLH Delivery

- 4.11 Housing surveys conducted in Southwold in 2013 and 2016 demonstrate a high demand from people living in Southwold for affordable housing. The 2013 survey identified a total of 21 existing households (43 people) who reported housing need and 11 households identified a further 19 people wishing to return to Southwold if appropriate housing were available. This amounts to 40 housing units needed, based on a 40% response rate from full-time residents. In January 2016 there were 80 people on the Waveney District Council Housing Register asking to be housed in Southwold and Reydon.<sup>21</sup> Of these, 22 were classified as being in high or medium need. In October 2019 these figures were 72 in total, with 27 in high or medium need.
- 4.12 There is another way to assess housing need which may be more appropriate for Southwold, given its small, elderly and shrinking population, and where many local people have moved away or given up aspiring to live in the town because of the unaffordable prices. This is to assess the number of people coming into Southwold to work as a percentage of Southwold's resident working population. The ONS study referred to in Section 3 found that there were more than twice as many people travelling to Southwold for work each day as there were Southwold residents in employment. This is the highest percentage in the ONS study. This is confirmed by the Local Plan's Strategy for Southwold: *"[T]here is a significant amount of in commuting to Southwold from outside of the Southwold and Reydon area. More homes in the Southwold and Reydon area, particularly affordable homes, will allow people who work in the area to live in the area"*.<sup>22</sup>
- 4.13 Providing affordable housing for people who work in Southwold would not only draw into the town a new generation with different skills and commitment to community, increasing the town's "human capital" and vibrancy. It would also help to reduce climate change emissions per capita by enabling people to walk or cycle to their place of employment and to local shops and community facilities.<sup>23</sup> This, in turn, would enhance the long-term health of the population, a priority of the Suffolk Health and Wellbeing Strategy.<sup>24</sup>
- 4.14 In 2016, there were 93 affordable dwellings in Southwold.<sup>25</sup> Since then, the East Suffolk Housing Authority (formerly Waveney) has built 20 more on a redundant builder's yard. Hastoe Housing Association has nine affordable units (four for rent and five shared ownership) under construction on the former community hospital site and is negotiating to buy the former Fire Station site to build an additional 10 affordable units. However, even with this amount of affordable housing development, the level of need is increasing.<sup>26</sup> This problem is likely to worsen unless action is taken, given that very few sites are likely to come forward in the future which are capable of delivering developer led affordable housing and the lack of DPA status to protect affordable

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<sup>21</sup> SNP Supporting Documents - Section 4

<sup>22</sup> Local Plan, P. 17; P. 132, Para 6.1

<sup>23</sup> Local Plan, Vision, P. 20

<sup>24</sup> "Evidence suggests that choosing a healthy lifestyle is likely to reduce demand on health and social care in the long term." <https://www.healthysuffolk.org.uk/board/our-priorities/older-people-in-suffolk-have-a-good-quality-of-life>

<sup>25</sup> 88 East Suffolk Housing Authority properties (with a turnover rate of 10% per annum); 4 owned by Hastoe Housing Association; and 1 shared ownership property at Tibby's Triangle.

<sup>26</sup> The Strategic Housing Market Assessment for the Local Plan identified an objectively assessed need for 374 new houses per year in the Local Plan area, of which 208 need to be affordable to meet local need, which realistically would not be provided through market-led allocation. Section 1.7 (Scale of Growth), pp 26-27.

housing converting to market housing and being sold off as second homes or holiday lets. To prevent this happening in the future, during the period of this Neighbourhood Plan, the preferred method for delivering affordable housing is through Community Led Housing (CLH) Groups with the legal ability to build permanently affordable housing.

4.15 CLH Groups can take different legal forms, but three qualities are essential for a development scheme to qualify as CLH:

- There must be meaningful community engagement in the development of a scheme.
- A CLH Group must own, manage or steward the homes in a manner of its choosing, including establishing an allocations policy that is consistent with its constitution. This policy should be transparent, reflect local housing needs, and be developed through consultation with the community and stakeholders.
- The benefit to the community must be clearly defined and housing affordability must be legally protected in perpetuity through a Section 106 agreement or other legally binding mechanism.<sup>27</sup>

4.16 CLH schemes are likely to have higher borrowing costs and lower income generation than market residential development; this needs to be taken into account to enable the acquisition of land at a price below market residential value that is required to make CLH affordable housing schemes viable. In this regard the two sources of land that potentially could be acquired at less than market residential value are sites covered by Local Plan WLP8.22 and WLP8.12 (Built Community Services and Facilities and Existing Employment Areas). These policies lower the value of land by restricting outright change of use to market residential unless there is lack of demand for community or employment use. Lack of demand must be evidenced by the marketing requirements set out in Appendix 4 of the Local Plan.

4.17 If during the marketing exercise for sites covered by WLP8.22 and WLP8.12, no schemes are forthcoming for community or employment use for the whole of the site, then Policies SWD2 and 3 come into play. They create a hierarchy of preferred uses for the land. The next lower use on the hierarchy will only be permitted if higher preference uses do not come forward during the marketing period, i.e.

- i. the first preferred use is mixed community/employment and permanently affordable housing (CLH delivery). If this is not possible, then,
- ii. the next preferred use that would be permitted is permanently affordable housing (CLH delivery). If this is not possible, then
- iii. the next preferred use that would be permitted is affordable housing delivered by a housing association.

If none of these preferred uses materialise, then the landowner may bring forward a scheme for alternatives uses.

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<sup>27</sup> *A Planner's Guide to Community Led Housing*, pp 7-8  
<https://www.communityledhomes.org.uk/resource/planners-guide-community-led-housing>. The seven most common types of CLH are Community Land Trusts; Co-housing; Cooperatives; Self-help housing; Community Self build; Self-finish; Tenant Management Organisations.

Community uses, which are defined in Section 9.3, may include a community business owned by a cooperative or community benefit society or other legal entity with an asset lock, where the profits generated by the business are reinvested in the community.

Policies SWD 2 and 3 support the objectives of WDP8.22 and WDP8.12 by creating the possibility of more working age people and families living in the town. This, in turn, will increase demand for existing and future community facilities.

It will also support employment by:

- i. providing a pool of workers for existing and future businesses;
- ii. generating year round demand for their goods and services; and
- iii. bringing into the town working age people who may start their own businesses.

It will be important to monitor the impact of these policies by reviewing them after they have been in effect for five years.

- 4.18 Policy SWD1 is slightly different in that it focuses on alternative uses of Assets of Community Value (ACVs). Local Plan Policy WLP8.22 does not permit change to a non-community use of ACVs. However, given the cost of development and land acquisition in Southwold, there are circumstances where the only realistic way to retain the ACV in community use is to cross-subsidize with another form of development. Given the pressing need for permanently affordable housing, this is considered to be the only acceptable form of cross-subsidy.

### **The Viability of CLH Schemes and Cross-Subsidy Through Market Housing**

- 4.19 The principles for achieving viability in CLH schemes, and illustrative case studies, are set out in “Viability of Community-led Housing Projects”, a report prepared by Locality at the request of Southwold Town Council.<sup>28</sup> In essence,

- The viability of any CLH scheme will need to be assessed on a case-by-case basis as development proposals come forward.
- CLH projects will have a different viability profile from conventional housing delivery. Their income will be constrained by their objective of delivering permanently affordable housing. At the same time, the cost of CLH schemes are likely to be higher, reflecting their more limited borrowing capacity because of lack of credibility with financiers in the early stages and before the organisation has assets to borrow against.
- It is likely that CLH schemes will need blended finance. This could be a mixture of gifts, grants, loans, community shares, crowdfunding, cross-subsidy, etc. Acquiring assets can also need donations, less than market valuations, bequests, taking on leases rather than purchasing, and working collaboratively with partners such as Housing Associations, Local Authorities, and landowners both public and private. The transfer of assets at low values can also enhance, or even determine, financial viability especially in areas where land values are high.
- A very important feature of CLH projects is the ability to avoid the developer’s profit, typically a minimum 20% uplift on their costs for a profit margin.

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<sup>28</sup> SNP Supporting Documents –Section 15

Community-led housing projects run by a legal entity which has a not-for-profit constitution, nonpaid trustees and many volunteer members can undertake many functions without cost to the project. The project costs can then be spent on experts: architects, surveyors, valuers, financial expertise, legal charges etc. Further savings can be made using “sweat equity.”

- Because of the different viability profile of CLH compared with market housing, the value of CLH sites should be assessed by an independent CLH financial viability appraiser taking into account the higher costs of CLH development of affordable housing (which therefore results in lower residual values).

4.20 Accordingly, to support viability, CLH schemes may consist of any mix of affordable tenure and size that is identified as being needed by the community at that time. There also may be a need to cross-subsidize the affordable housing element of the scheme with a limited number of market residential units. This would be acceptable provided it is clearly demonstrated that the amount of market residential is no greater than is required to make the affordable scheme deliverable.

4.21 It is recognised the CLH schemes will need to be innovative in terms of funding, partnerships and potentially design. That this is possible has been demonstrated in Southwold, where an innovative CLH scheme is under development. After the NHS announced in 2015 that Southwold’s community hospital would be decommissioned, the Town Council obtained its designation as an ACV. A CLH Group was formed and partnered with Hastoe Housing Association (Hastoe) on a development proposal that involved Hastoe giving one-third of the site to the CLH Group for free and Hastoe building out the rest of the site with a 100% affordable housing scheme. This was made viable through a high level of government grant because of the scheme’s extra community benefits that included restoring the landmark Victorian building. Having acquired its part of the site for free, the CLH Group was able to raise over £1 million from community shares and grants to build a community hub for a new library, nursery, co-working space and a ‘farm-to-fork’ café.

4.22 This innovative approach, supported by all of the departments within East Suffolk Council with an interest in the project (Planning, Economic Development, Housing and Community), which enables retention of ACVs for some community use, is embedded in the Neighbourhood Plan by Policy SWD1.

## **POLICY SWD1 – REDEVELOPING ASSETS OF COMMUNITY VALUE FOR COMMUNITY LED HOUSING DEVELOPMENT OF PERMANENTLY AFFORDABLE HOUSING**

- A. Proposals to redevelop a registered Asset of Community Value within the settlement boundary to part community use and part affordable housing will be supported where:**
- i. it can be demonstrated that the current and alternative community uses for the whole of the site have been fully explored and that the redevelopment is necessary to enable the retention and continued use of part of the ACV for community use; and**
  - ii. if community use is provided on only part of the site, then a Section 106 (or other enforceable) agreement will be required to ensure that this use is for the benefit of the community and is controlled by an eligible voluntary or community body as defined in the Localism Act 2011 (a parish council or voluntary or community body with a local connection); and**
  - iii. the change of use of the rest of the site is restricted to permanently affordable housing.**
- B. The change of use of any part of the site for permanently affordable housing should be delivered by a Community Led Housing Group.**
- C. Cross-subsidy of permanently affordable housing with an element of market housing will be supported if it is demonstrated through an independent, community-led housing viability study that market housing is essential to make the mixed community and affordable housing scheme viable. Any market housing demonstrated as necessary to cross-subsidise affordable housing must be no greater than that required to make the affordable scheme deliverable, and, in any event, should not exceed the amount of affordable housing.**



## **POLICY SWD2 – REDEVELOPING COMMUNITY USES FOR PERMANENTLY AFFORDABLE HOUSING**

- A. Proposals to redevelop community land or buildings within the settlement boundary will be supported based on a hierarchy of preferred uses. Lower priority uses will only be considered if, following a sustained marketing campaign that meets the requirements of Local Plan Policy WLP 8.22, higher priority schemes do not come forward. In descending order of priority, the preferred uses are:**
- i. Solely community uses;**
  - ii. If, and only if, a proposal for solely community use does not come forward during the marketing campaign, then development of a mix of community use and permanently affordable housing will be permitted.**
  - iii. If, and only if, a proposal for uses i- ii does not come forward during the marketing campaign, then development of the whole site for permanently affordable housing will be permitted.**
  - iv. If, and only if, a proposal for uses i- iii does not come forward during the marketing campaign, then an affordable housing scheme delivered by a housing association will be permitted.**
  - v. If none of the above uses come forward during the marketing campaign, then alternative uses will be permitted.**
- B. The change of use of any part of the site for permanently affordable housing should be delivered by a Community Led Housing Group.**
- C. Cross-subsidy of permanently affordable housing with an element of market housing will be supported if it is demonstrated through an independent, community-led housing viability study that market housing is essential to make the mixed community and affordable housing scheme viable. Any market housing demonstrated as necessary to cross-subsidise affordable housing must be no greater than that required to make the affordable scheme deliverable, and, in any event, should not exceed the amount of affordable housing.**

## **POLICY SWD3 – REDEVELOPING EXISTING EMPLOYMENT AREAS FOR PERMANENTLY AFFORDABLE HOUSING**

- A. Proposals to redevelop land in Existing Employment Areas within the settlement boundary will be supported based on a hierarchy of preferred uses. Lower priority uses will only be considered if, following a sustained marketing campaign that meets the requirements of Local Plan Policy WLP 8.12, higher priority schemes do not come forward. In descending order of priority, the preferred uses are:**
- i. A solely employment use.**
  - ii. If, and only if, a proposal for solely employment use does not come forward during the marketing campaign, then development of a mix of employment and permanently affordable housing will be permitted.**
  - iii. If, and only if, a proposal for uses i- ii does not come forward during the marketing campaign, then development of the whole site for a solely permanently affordable housing will be permitted.**
  - iv. If, and only if, a proposal for uses i- iii does not come forward during the marketing campaign, then an affordable housing scheme delivered by a housing association will be permitted.**
  - v. If, and only if, a proposal for uses i- iv does not come forward during the marketing campaign, then alternative uses will be permitted.**
- B. The change of use of any part of the site for permanently affordable housing should be delivered by a Community Led Housing Group.**
- C. Cross-subsidy of permanently affordable housing with an element of market housing will be supported if it is demonstrated through an independent, community-led housing viability study that market housing is essential to make the mixed community and affordable housing scheme viable. Any market housing demonstrated as necessary to cross-subsidise affordable housing must be no greater than that required to make the affordable scheme deliverable, and, in any event, should not exceed the amount of affordable housing.**
- D. For a scheme to be approved, evidence must be provided that all of the conditions in A-C above have been met and the marketing campaign complies with Local Plan Policy 8.12.**

## Housing Occupied as Second Homes or for Holiday Letting

- 4.23 Southwold has had a tourism economy since the 1870's but until the 1990's, second homes were a small part of this economy.<sup>29</sup> Most visitors lodged in hotels, bed and breakfast accommodation or boarding houses. The majority of the town's housing stock was occupied by full time residents, typically on a long-term rental basis. Today, the most notable feature of Southwold's housing stock is the high proportion of dwellings occupied as second homes and/or used for holiday letting.
- 4.24 According to the 2011 ONS study,<sup>30</sup> Southwold is the coastal community with the highest proportion of household spaces with no usual residents, 50%, in the whole of England and Wales. Moreover this has changed substantially in the period since 2001, when the equivalent figure was 38%. By contrast, the average rate of non-principal residents in small coastal communities in England and Wales is 10.4% and in England and Wales as a whole, it is 4.4%.
- 4.25 In 2016, the SNP team conducted a comprehensive building by building survey of the town to obtain an up-to-date understanding of the number of buildings and their current use. This survey identified 1,388 number of houses classified as C3 use. Of these, it found that 57% of were occupied as second homes or were used for holiday letting.<sup>31</sup>



**Figure 4.2: Use of dwellings in Southwold, 2015**

- 4.26 To obtain a better understanding of long term trends, the SNP team conducted additional research into the use of properties sold between 2006 and 2016.<sup>32</sup> The results show that of the 498 homes sold during this ten year period, only 24% were occupied by permanent residents. The remaining 76% had become, or continued to be, holiday lets or second homes.
- 4.27 Using these and other data, the SNP developed three different methods to attempt to project the size of Southwold's permanent population over the period 2016 – 2036. All are highly uncertain but, interestingly, they give comparable answers. If nothing were

<sup>29</sup> The number of second homes in the UK more than doubled between 1995 and 2013 (English Housing Survey). This surge is associated with second home consumption by a growing cohort of 'top earners' and the view that housing is a sound 'investment good'. "Second Home Investment" Professor Christian Hilber, Centrepiece, Autumn 2018 <http://cep.lse.ac.uk/pubs/download/cp543.pdf>

<sup>30</sup> ONS (2014) 2011 Census: Coastal Communities

<sup>31</sup> SNP Supporting Documents - Section 4.2

<sup>32</sup> SNP Supporting Documents - Section 4.3

to change, then in 15-23 years, Southwold’s permanent population would reach a level of about 450 over-18s, living in 225 residences.<sup>33</sup>

- 4.28 In January 2020, further research was conducted into the incidence of holiday letting of C3 dwellings. The number of homes used for this purpose had increased from 300 in 2016 to 374 in 2020.
- 4.29 The continuing conversion of Southwold’s stock of C3 dwellings to second homes and holiday letting is having a profound impact on the sustainability of the town. Southwold Primary school has a capacity of 105 places. In June 2019, Suffolk County Council predicted that by June 2024, Southwold Primary School would be 67 places below capacity. This means it would be highly under-utilised and at risk of being financially unsustainable. In sum, if nothing were to change, Southwold could lose its primary school, which would make the town a less attractive place for working families.

<b>Catchment Area</b>	<b>Net Capacity</b>	<b>95% Capacity</b>	<b>Forecast 2020/21</b>	<b>Forecast 2021/22</b>
Southwold Primary School	105	100	49	52
	<b>Forecast 2022/23</b>	<b>Forecast 2023/24</b>	<b>Forecast 2024/25</b>	<b>Forecast Surplus Places</b>
	48	50	49	51

- 4.30 In light of these trends, it is not surprising that in responses to the Neighbourhood Plan questionnaire<sup>34</sup> 87% of residents, and 73% of second homers, were in favour of mechanisms in the Neighbourhood Plan to encourage full time residency. In response to the question “How does the high proportion of second homes and holiday lets affect you?” 47% of residents listed ‘Worried about the sustainability of the Southwold community’ as their first or second priority.
- 4.31 Southwold’s elderly population is especially vulnerable to the social and health impacts of living in a town where many of the surrounding dwellings are empty during the winter months. The Suffolk Health and Wellbeing Strategy states that “Appropriate housing, access to transport and a safe environment can help improve quality of life, independence and promote social inclusion. Evidence suggests that social isolation is a contributing factor in over 60% of preventable illnesses.”<sup>35</sup>
- 4.32 Appropriate housing includes achieving the right balance between full time homes and dwellings that are occupied part of the time, or not at all, so that elderly residents do not feel isolated and vulnerable.
- 4.33 In-depth interviews with business owners have highlighted deep concerns about the impact of the lack of full time residents on their viability; a typical comment was that the abundance of tourism during the summer did not make up for the lack of off-season trade. Significantly, whilst this comment might have been expected from shops supplying ordinary needs like the hardware, butcher or delicatessen, it was also made by businesses that cater for tourists.

<sup>33</sup> SNP Supporting Documents - Section 4.4

<sup>34</sup> SNP Consultation Documents - Section 1

<sup>35</sup> Suffolk Joint Strategic Needs Assessment

- 4.34 Equally, it is important to recognise that the occupiers of many holiday homes are committed to Southwold and have a positive impact on the town. Many come to the town regularly and, in the case of those owning second homes, some spend quite long periods of time, so are very committed to Southwold. Indeed many end up living in Southwold. The second home/holiday let housing market creates local jobs for painters, decorators, cleaners, gardeners, etc. At the same time, Southwold also has “buy to invest” properties which are empty nearly all year round. Some owners of holiday lets regard the town as a business opportunity rather than their community.
- 4.35 With the ability to physically expand Southwold greatly restricted by its near-island nature and the sensitive environment in which it sits, it is important to strike the right balance so that the thriving tourism economy does not undermine the town’s viability. Without a thriving full time community, Southwold will lose many of the things that make it a place that people want to visit and spend their holidays.
- 4.36 In seeking to strike this balance, and in light of the trends over the past 10-15 years which are considered to have swung too far, it is necessary to have a ‘principal residence requirement.’ This policy applies to all new housing (except for like for like replacements) whether newly constructed or created from changes of use and/or the conversion of existing buildings. The policy also extends to affordable housing to ensure that even if becomes market housing through staircasing or the right to buy, it will still be occupied by full time residents.
- 4.37 It will be important to review the outcomes of this policy over the early years of the Neighbourhood Plan. If it is considered that this is having a detrimental impact on the vitality and viability of Southwold, then there will be an early review of the Plan and Policy SWD4 in particular.

## **POLICY SWD4 - PRINCIPAL RESIDENCE REQUIREMENT**

**Proposals for all new housing (including affordable housing but excluding replacement dwellings) will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence.**

**Principal Residence housing is defined as a property which is occupied as the sole or main home of the occupants and where the occupants spend the majority of their time when their employment does not required them to be away from home for purposes of their work.**

**New housing includes both dwellings that are newly constructed or created through change of use.**

**These restrictions will be secured prior to the grant of planning permission through appropriate Planning Conditions or Planning Obligations created and enforceable under section 106 of the Town & Country Planning Act 1990, or any subsequent successor legislation.**

## Holiday Letting

- 4.38 In February 2020, comparethemarket.com advertised Southwold as the top destination in England and Wales for investment in a second home. “Possible annual rental revenue from Southwold is way more than any other seaside town, at £115,689, with an average daily rate coming in at £334.”<sup>36</sup>
- 4.39 Dwellings (C3 use class) available for short stay self-catered letting that total 140 days or more per year are classified as small businesses, which are exempt from both council tax and business rates due to the small business rate exemption. This, and other tax benefits, has made holiday letting an increasingly attractive form of investment. As at 2016, 22% of Southwold’s housing stock were holiday lets; 28% of dwellings sold between 2006 and 2016 became holiday lets.<sup>37</sup> A survey in January 2020 showed that the number of holiday lets had increased to 374 (26%).<sup>38</sup>
- 4.40 As would be expected, the high number of dwellings used for holiday letting in Southwold is inversely correlated with the low number of homes available for full time market rent – 10% compared to 15% in Waveney.<sup>39</sup> A robust private rental market fills an important gap in the housing market by providing homes for people who cannot afford to buy their own home but do not qualify for affordable housing or people relocating to the area for work. In fact, having a strong supply of rental housing is necessary to support the major infrastructure projects that will dominate the economy of the East Suffolk area for most of the period of the SNP.
- 4.41 The conversion of dwellings to short stay self-catered letting for holiday visitors, which could be rented out to full time occupants, undermines the Local Plan’s vision for Waveney: “*There will be sufficient housing of the right types and tenures to meet the needs of the population and people moving to the District.*” It also works against the overall spatial strategy for Southwold and Reydon which is to make homes more affordable for those working in the area through new housing growth with a range of tenures<sup>40</sup>.
- 4.42 Intensive use of dwellings for holiday letting can be associated with unneighbourly behaviour. When people are on holiday, they tend to use a property differently from when they are in their own home. Local residents complain about excessive noise; light pollution from all-night security lighting; anti-social parking, unmanaged rubbish that reduces recycling and attracts vermin. The amenity of residents is also harmed in other indirect ways. Users of holiday lets do not participate (other than as consumers) in community institutions that rely on volunteers to deliver events and services. (The Town Council, Scouts and Guides, the RNLI, the Voluntary Help Centre, Christmas Lights Committee, Arts Centre and Arts Festival are all mainly run by volunteers.) By reducing the capacity of communities to deliver community facilities, holiday letting on a large scale works against the intention of the Local Plan’s communities policy, which is protect community facilities to ensure vibrant communities.<sup>41</sup>

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<sup>36</sup> <https://www.comparethemarket.com/home-insurance/content/second-homes-by-the-sea/>

<sup>37</sup> SNP Supporting Documents - Section 4.3

<sup>38</sup> SNP Supporting Documents - Section 13

<sup>39</sup> 2011 Census.

<sup>40</sup> Local Plan (2019), p20 and p22 <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/waveney-local-plan/>

<sup>41</sup> Planning Inspector Appeal Decision, APP/Q0505/C/18/3193261 17 Richmond Road, Cambridge CB4 3PP, 2018

- 4.43 The high number of dwellings used for holiday letting is an underlying cause of three weaknesses and threats identified by the East Suffolk Economic Growth Plan: i) the area’s relatively old and ageing population which has widespread implications (including for workforce skills); ii) housing affordability, which is challenging for people, particularly young people, who rely on local jobs, many of which are poorly paid; and iii) high levels of second home ownership, particularly in Southwold.<sup>42</sup>
- 4.44 As with the principal residence requirement, a balance needs to be struck between providing adequate accommodation for tourism and the impacts of holiday letting. This requires a policy intervention to ensure that where dwellings are being used intensively for holiday letting, change of use is required. This will be done on a case by case basis, taking account of the particular circumstances to determine whether, as a matter of “fact and degree,” the property has ceased to have the characteristics of a dwelling.<sup>43</sup>
- 4.45 Circumstances which are likely to contribute to a material change of use could include the number of people using a dwelling house at any one time; the number of unrelated parties; the frequency and duration of bookings; the impacts of visitors to the premises; proximity to other dwellings; the availability of on-site car parking; and other impacts that materially affect local amenity. Consideration should be given to actual and potential impacts and also to indirect and cumulative impacts.
- 4.46 Many of the dwellings being used as holiday lets do not have adequate on-site parking facilities to meet the demand from visitors. The January 2020 survey revealed that 239 holiday lets, including a number advertising accommodation to more than 10 guests, did not provide any off-road parking.

## **POLICY SWD5 – HOLIDAY LETTING**

**Insofar as planning permission is required, development proposals for new C3 development for holiday letting (sui generis) or for the change of use of a C3 residential house to a holiday let (sui generis) will only be supported where:**

- a) car parking can be provided in the curtilage of the building in accordance with Policy SWD7 (Parking);**
- b) the proposed use would not have an unacceptable impact on the amenities of houses in the immediate locality; and**
- c) the wider effect of the proposal would not be unacceptable taking account of the cumulative and indirect impacts of holiday lets in the town.**

<sup>42</sup> East Suffolk Economic Growth Plan, p11 <https://www.eastsuffolk.gov.uk/assets/Business/East-Suffolk-Growth-Plan.pdf>

<sup>43</sup> Moore v. SSCLG [2012] *Neither of the two extreme propositions – that use of a dwelling house for commercial holiday lettings will always amount to a material change of use, or that use of a dwelling house for commercial holiday lettings can never amount to a material change of use – is correct*

## 5. DESIGN

### Introduction

- 5.1 The importance of design, especially concerns about over-development, were highlighted by the Neighbourhood Plan survey, with 87% of respondents expressing a view that discouraging infill of gardens and courtyards was important. Protecting and enhancing 'historic building styles and materials' was a first or second priority of over 40% of respondents and protecting and enhancing 'open spaces' was an equivalent priority for 42% of respondents<sup>44</sup>.
- 5.2 The Local Plan<sup>45</sup> (Policy WLP8.29 –Design) both supports high quality design -- whether innovative or traditional – that “reflects local distinctiveness” and also encourages Neighbourhood Plans to set out design policies that respond to local circumstances.
- 5.3 The factors that create local distinctiveness can be summarised as the character of buildings and the spaces around them; the surrounding landscape; and the interaction of the built and natural environment.

### Landscape

- 5.4 The Waveney District Council Landscape Character Area Assessment<sup>46</sup> describes the town as having a “unified character which adds to the strong sense of place evident in this part of the Suffolk Coasts and Heaths AONB.” The town is “traditional,” “compact,” “low key,” “contained by landform and estuary,” and characterised by “an intimate spatial scale in terms of streets and building heights”. Its skyline has “a simple and uncluttered character.” As for its setting, “this is a simple, often wild coastal landscape of big skies and defined by panoramic views across a windswept, exposed coast to an ephemeral seascape characterised by tidal movement and associated changes in the quality of reflected light and shadow.”
- 5.5 The National Planning Policy Framework requires local planning authorities to give great weight to conserving landscape and scenic beauty in the AONB (Paragraph 176).
- 5.6 Local Plan Policy WLP8.33 requires development proposals to be informed by and be sympathetic to the distinctive character of Southwold’s landscape. “Proposals should demonstrate that their location, scale, form, design and materials will protect and where possible enhance the special qualities and local distinctiveness of the area and visually sensitive skylines, seascapes and significant views towards key landscape and cultural features... Proposals should also include measures that enable a scheme to be well integrated into the landscape...”
- 5.7 The impact of development on landscape is particularly important on the perimeters of the built area of the town – for example, North Road, Ferry Road, the Harbour, the Common, Blyth Road, Mights Road, Station Road, North Parade, East Cliff, Centre Cliff, and Gun Hill.

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<sup>44</sup> SNP Consultation Documents - Section 2

<sup>45</sup> <http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/new-waveney-local-plan/>

<sup>46</sup> The Waveney District Landscape Character Assessment (2008)

<http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Landscape-Character-Assessment/Landscape-Character-Assessment-Part-2.pdf>



## Over-development

- 5.8 Over-development is often defined as “trying to fit a quart into a pint pot.” In the context of the Neighbourhood Plan Area, it describes schemes that are incompatible with Southwold’s compact, low key, intimate spatial scale because of their out-sized relationship to the original building/plot and its surroundings in terms of footprint, height, width, massing, boundary set-backs, gaps between buildings, and architectural detailing.
- 5.9 The Southwold Conservation Area Management Plan 2008)<sup>47</sup>, which covers about two-thirds of the town, described “overdevelopment” as a key issue affecting the quality of Southwold’s built and natural environment. It notes the pressure within the Conservation Area for the development of gardens, the tendency to add additional storeys or convert lofts, with the consequent demand for roof lights or dormer windows, often visually inappropriate. Since the Management Plan’s publication, the quality of heritage assets has suffered from the cumulative impacts of mostly small scale development proposals for replacement dwellings, extensions, conversions, and garden infill structures. Stronger design guidance is needed to prevent further harm to heritage assets.
- 5.10 Poor quality design is also a concern in the Town Farm and Gateway character areas of Southwold. (Only a part of the Gateway character area is included within the Conservation Area boundary.) These parts of the town, which lie to the north and west of the original town, were mainly developed after 1900. They have many 20th century structures including garages, bungalows, terraces, simple cottages and detached houses that, with their associated gardens, make a positive contribution to the town’s character.
- 5.11 The expansion of the holiday let industry in Southwold has intensified the pressure for over-development in Southwold as homes previously occupied by families, elderly retired people, or as social housing are being developed for temporary occupancy by visitors. As applicants seek to create the largest possible number of bedrooms with ensuite bathrooms in order to generate the highest level of holiday let rental fundamental principles of good design are being sacrificed. Garden space is significantly reduced; green areas paved for car parking or to keep maintenance costs low; high boundary walls erected by absentee owners concerned about security despite Southwold’s low crime rates.
- 5.12 These alterations to maximise holiday let revenue are being made on dwellings that require all of the amenity space and facilities to make functional, permanent dwelling places for future occupants. Consequently, Southwold, which has such limited land for new build development, is suffering the loss of housing stock suitable for different groups in the community – for example, houses with gardens suitable for families with children; cottages suitable for older people who wish to downsize; and bungalows suitable for people with disabilities. This contributes to the vicious circle of Southwold’s demographic decline.

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<sup>47</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/WDC-Conservation-Area-Appraisals/Southwold/Southwold-Conservation-Area-Management-Plan.pdf>

## The National Design Guide and Southwold Character Area Appraisal

- 5.13 The Local Plan states unequivocally that development proposals “will be refused” if they fail to meet the Local Plan’s criteria for demonstrating “high quality design which meets local distinctiveness.” (Policy WLP 8.29 –design). The Neighbourhood Plan reinforces this expectation by incorporating the National Design Guide (NDG) and the Southwold Character Area Appraisal (SCAA) into its design policy.
- 5.14 The NPPF requires the use of design guides to help applicants achieve high quality design. The NDG (Para 168) states that the NDG should be used in the absence of a local design guide. The Local Plan calls for the use of Building for Life<sup>12</sup> for “major residential development proposals”, defined as schemes of over ten dwelling. However, the Local Plan is silent on the use of design guides for the small scale development typical of Southwold. A Suffolk Design Guide has been commissioned but has not yet been published. Until such time as the Local Plan adopts a local design guide that is suitable to the Neighbourhood Plan Area, then the NDG (which is applicable to proposals of all sizes) will be used to achieve high quality design in Southwold and to determine applications.<sup>48</sup>
- 5.15 In specifically adopting the NDG as part of its Neighbourhood Plan, Southwold is encouraging decision-makers, applicants, and designers to ask the question, “Is this design good enough to be accepted?” instead of “Is it bad enough to be refused?”
- 5.16 The NDG makes clear that good design is achieved by making the right choices -- at all levels and scales (Para 57) -- about layout; form and scale; appearance (a concept not included in the Local Plan), landscape, materials and detailing.
- 5.17 The NDG introduces 10 characteristics of well-designed buildings and places. Whilst not all characteristics will apply to every application, it is expected that Context, Identity and Resource will always be relevant.
- 5.18 The NDG highlights the importance of taking the opportunities available for improving the character and quality of an area. *“Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones (Para 40). Well designed development proposals are shaped by an understanding of the context that identifies opportunities for design as well as constraints upon it (Para 41).”*
- 5.19 The emphasis on opportunities is especially relevant to Southwold, whose small scale, density, and the lack of land for development amplify the impact of poor quality design. Simply put, Southwold does not have the room for mistakes, nor does it have room for design that is “better” but still not “best.” When schemes do not maximise the opportunities for improving the quality of design, they should be refused.
- 5.20 The purpose of the SCAA is to help applicants understand the Context and Identity of Southwold. This document uses four character areas identified in the Southwold Conservation Area Character Appraisal 2008<sup>49</sup> and adds three more areas. (See Section 13)

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<sup>48</sup> National Design Guide, p4, paras 13-14 <https://www.gov.uk/government/publications/national-design-guide>

<sup>49</sup> <http://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/waveney-conservation-areas/conservation-area-appraisals/southwold-conservation-area-appraisal/>

The seven distinct character areas are:

1. Old Town
2. Marine Villas
3. Seaside Suburban
4. Seaside Corporation
5. Town Farm
6. Gateway
7. Harbour and Ferry Road

5.21 The SCAA describes the history of development, landscape, townscape vegetation, undesignated heritage assets, and open and green spaces. It also provides some pictorial guidance on design that is considered “in character” and “out of character,” with explanations.

5.22 The SCAA will need to be read in conjunction with the Conservation Area Appraisal. The primary focus of the Conservation Area Appraisal is identifying and describing heritage assets. The SCAA focuses on the qualities that give each area a distinctive identity.

5.23 For each area, the SCAA highlights sensitivities and susceptibilities. All applications will be expected to demonstrate how they are responding positively to sensitivities and susceptibilities and how they are taking opportunities to avoid and correct previous mistakes by, for example, reinstating original boundary treatments, window styles and other detailing, or restoring and improving garden space. Sensitivities and susceptibilities are based on the field work undertaken for the SCAA, which identified the recurrent design issues discussed below. This approach is consistent with the design-led approach as captured in national planning policy. The Neighbourhood Plan sets out the Town Council's approach towards a clear design vision and expectations for development sites. This will ensure that applicants have as much certainty as possible about what is likely to be acceptable.

## **Recurrent Design Issues**

### **Designing for Age and Disability**

5.24 An aging population, an issue throughout Suffolk, is a particularly acute issue for Southwold. Yet newly built housing or extensions and conversions often do not create adaptable housing that takes account of the changing needs of elderly people. Southwold has a good stock of bungalows but many have been converted to holiday lets and others are being demolished and rebuilt for the holiday let sector.

### **Landscape Character**

5.25 Development on the perimeter of the built area of the town does not always respond to and enhance the character of its exceptional landscape.

5.26 Landscape is experienced from two directions – from inside the town looking out, and from outside the town, looking in. Accordingly, development proposals should be treated as double-sided and assessed from the special landscape areas identified in the Character Area Appraisal.

5.27 For perimeter development, the landscape may be the most important element in the setting. Therefore, the application needs to demonstrate that the applicant has understood the landscape context and that the design has responded to this context.

### **Amenity – Sense of Space and Visual Amenity**

5.28 The Local Plan, Paragraph 8.157, states: “It is a primary aim of the planning system that development should deliver good standards of amenity for existing and future occupiers and surrounding uses and does not generate significant harmful effects. Harmful effects can arise from overlooking, loss of privacy, noise and light pollution, and overbearing development, amongst others. Such effects can be triggered by individual developments or as a result of cumulative impacts. The impact can be acute or dispersed, affecting the general amenity or tranquillity of an area.”

5.29 In Southwold, amenity impacts are frequently dispersed. The town is densely developed with an urban grain that is a mixture of “ancient desire lines” and planned development from the Victorian, Edwardian and Garden City periods – all within a small and contained geographic area. In many parts of the town, dwellings are in close proximity, overlooking each other. Southwold also has a number of alleys, footpaths, and private shared paths that lead to courtyards or individual buildings. This creates visibility even when structures do not front onto streets.

5.30 Within Southwold’s dense urban grain, the open spaces around buildings (including gardens, courtyards, and all rights of way) combine to create a sense of space for surrounding dwellings. Encroaching development can affect this essential amenity. Accordingly, a proposed scheme’s impact on sense of space should always be considered, taking into account the cumulative impact of earlier development on the surrounding area.

5.31 Poor quality design creates visual blight, which will always have a significant adverse impact on visual amenity. In Southwold, the design of buildings can be experienced not only from the street but also from the public or private domain in the rear of buildings, or from public rights of way or shared private paths. Accordingly, when an application is assessed, its impact on visual amenity should be considered from all sides, including from private space from which it would be visible. This principle of looking at the impact of design from the side and rear as well as front elevations is already embedded in the Waveney Built Heritage and Design Supplementary Planning Document<sup>50</sup> (April 2012), (Sections 4.19 – 4.20).

### **The Public Realm**

5.32 Historic walls are protected within the Conservation Areas but outside the Conservation Areas, there are 20<sup>th</sup> century boundary treatments that contribute positively to character. Some have been identified in the Character Area Appraisals; others will be identified through individual planning applications. Where boundary walls contribute positively to character, they should be preserved and restored.

5.33 Development proposals will be expected to take account of their impact on the public realm, and preserve and enhance its character. Landscaping should provide green areas visible to the public and contribute to bio-diversity. New boundary walls should harmonise with the character of the area.

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<sup>50</sup> <http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/existing-waveney-local-plan/supplementary-planning-documents/guidance-for-historic-buildings-and-conservation-areas/>

## **Coherence**

- 5.34 Often, new development is poorly integrated because of forms, elevations, materials, and detailing that are incongruous, out of scale and not proportional. There are also examples of visually dominant subsidiary development that has overwhelmed the original building.
- 5.35 Many of Southwold's buildings are simple cottages, whose quality depends to a large extent on maintaining their simplicity and their completeness. Design proposals that clutter and dilute the character of simple cottages will not be acceptable.
- 5.36 Southwold has a number of rows of terraces, pairs of semi-detached houses, and one cluster of bungalows, whose quality of design derives from uniformity, and repetition of rhythms. Alterations to some of these buildings has degraded character by introducing elements and details that noticeably break up uniformity and rhythm, creating incongruity. Where uniformity, including rhythmic repetition, is a part of character, design proposals will be expected to preserve and enhance these qualities including through the use of consistent forms, elements, materials, fenestration, and detailing. Loss of coherence is not a justification for further erosion of character but an opportunity for reinstatement of lost character.

## **Ancillary In-fill Structures**

- 5.37 There is a trend of development proposals for infill structures in gardens that are justified as ancillary structures to the main dwelling because of their purported use as studios, over-spill family accommodation, games rooms, granny annexes, etc. These are then subsequently converted to holiday letting without planning permission. Enforcement action by East Suffolk Council may be required in some cases.

## **POLICY SWD6 - DESIGN**

**In order to create high quality buildings and places that are beautiful and enduring, development proposals should be informed by the National Design Guide as appropriate to their scale nature and location and respond positively to its principles.**

**All planning applications should demonstrate, either through the Design and Access Statement where this is required or through sufficiently detailed plans and documents, that they have:**

- A. understood and followed the process for creating high quality design set out in the National Design Guide;**
- B. understood and proposed design that is sympathetic to and in keeping with the best of the prevailing local character area;**
- C. maximized the opportunities to improve the quality of design;**
- D. positively addressed the Recurrent Design Issues and area-specific Sensitivities and Susceptibilities identified in the Southwold Character Area Appraisal (SCAA) and reinstated character where the SCAA identifies opportunities for this; and**
- E. where relevant, addressed heritage management issues identified in the Southwold Conservation Area Appraisal.**

**Development proposals which do not demonstrate their compliance with the design principles A – E above will not be supported.**

## 6. SUSTAINABLE TRANSPORT

- 6.1 In a small historic town like Southwold, which is a very popular tourist destination, it is inevitable that parking is a significant issue. This is most keenly felt by local residents and people working in Southwold but living elsewhere, with many experiencing problems finding a parking space convenient to their residence or place of work, particularly during the peak tourist period and school holidays. The Town Council receives frequent complaints about anti-social parking that blocks pavements, footpaths and roads, erodes green spaces, and creates risks to pedestrians and cyclists. The Town Council has been one of the few parishes in Suffolk to pay for a full time Police Community Support Officer in order to obtain more effective parking enforcement.
- 6.2 The SNP's response to Climate Emergency includes sustainable transport policies that respond to Southwold's particular transport profile and give great weight to preserving and enhancing its distinctive built and natural environment.

### Transport Profile

#### Accessibility

- 6.3 Like some other rural towns, Southwold has no direct rail access and a limited bus service. Consequently, cars are the main form of transport to and from the town. However, the town itself, with its small settlement area and flat topography, is readily accessible by walking, cycling or mobility scooters. Southwold with Reydon retains a high level of services and facilities, which make the town quite self-sufficient, reducing the need for car trips.

#### Parking Demand at Origin

- 6.4 2011 Census data for car ownership in Southwold shows low rates of car ownership. Over three-quarters (78%) of residents living in houses owned one vehicle or less and 88% of residents living in flats owned one vehicle or less.<sup>51</sup> Consequently, the need for car parking spaces at point of origin is currently modest.
- 6.5 Reflecting the low demand for car parking spaces at origin, the Local Planning Authority has been flexible about applying the Suffolk Highway Guidance in special circumstances that deliver public benefits. It approved lower parking provision for Duncan's Yard (20 affordable housing units) to achieve a greener scheme with more trees and shrubs. It also permitted lower parking provision for the Southwold Hospital to enable delivery of an extra affordable dwelling to make retaining community use of the building financially viable.

#### Parking Demand at Destination

- 6.6 Although the demand for parking at origin is low, there is very high demand for destination parking. Some destination demand is from employees traveling by car or van to work in Southwold but the vast majority comes from visitors. To understand the extent of visitor demand, during the period 28 August 2019 – 9<sup>th</sup> September 2019, Suffolk Highways organised a traffic count, at the request of the Town Council: an average of 5,087 cars per day entered the town.

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<sup>51</sup> SNP Supporting Documents - Section 1

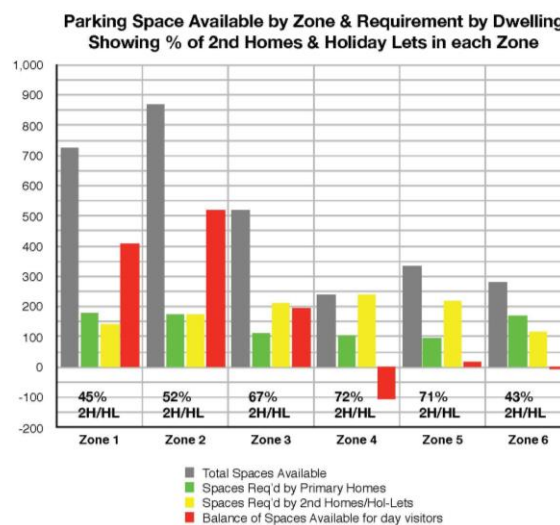
6.7 Day trippers can be accommodated in the town’s car parks, but long stay visitors, mostly using holiday lets, treat their temporary accommodation as though it were their home, seeking on-street parking as close to the house as possible. However, many holiday lets do not provide enough, or even any, off-street parking. The Neighbourhood Plan team’s January 2020 Holiday Let Survey<sup>52</sup> showed that there were 146 holiday lets offering rooms for six or more guests but only 46 out of the total number of holiday lets in the town provided off-site car parking for two or more cars.

## Parking Provision

### On-Street

6.8 The historic centre of Southwold was designed before the arrival of cars. Most of the centre’s roads are narrow and mostly flanked by small frontage attached houses, with very few dwellings having off-street parking. Southwold has an extensive system of yellow lines to prevent on-street parking from obstructing traffic flow and endangering cyclists and pedestrians.

6.9 To obtain a better understanding of on-street parking capacity, the Neighbourhood Plan Team undertook a survey in 2016 of roadside parking availability based on the use of dwellings (primary residence, second home, holiday let) and net kerbside availability. The town was divided into six Parking Zones with approximately the same number of dwellings. These are shown in the Parking Zone Policy Map, see figure 6.2 below. The results demonstrate that there are three Parking Zones (4, 5 and 6), all in the historic centre of town, that are at capacity, or have exceeded their capacity, to provide for the cumulative parking needs of residents, workers and visitors for on-street parking. These zones are considered to be under such parking stress that applications for development in the area of these zones which propose additional on-street car parking to satisfy the requirements of Suffolk Highways Guidance, will be refused unless the applicant can demonstrate that even in periods of peak demand additional take-up of on-street car parking spaces will not contribute to parking congestion. Peak demand is normally highest in August through the Bank Holiday weekend.



**Figure 6.1 Parking Availability and Requirement by Zone in 2016**

<sup>52</sup> SNP Supporting Documents - Section 9





Figure 6.2 Southwold Parking Zones

### **Residential Off-Street**

- 6.10 The majority of dwellings in Southwold were built without providing for off-street parking on site. (The main exception is 20<sup>th</sup> century development on Hotson Road, Pier Avenue, parts of North Road, and the small element of 21<sup>st</sup> century development scattered through the town.)
- 6.11 Because of Southwold's density, there is little capacity to create additional off-street car parking without damaging the character of the town and its natural environment, and, by introducing new dropped kerbs, causing net loss of on-street parking
- 6.12 There are several clusters of garages, built off-site, that serve particular dwellings. If these off-site garages are lost through redevelopment, the town could lose up to 30 off-street spaces.

### **Off-Street Parking Areas**

- 6.13 The Town has a total of eight off-street parking areas. Three, the Pier; Harbour; and Ferry Road, are owned and operated by East Suffolk Council. The Godyll Road Car Park is owned by the Town Council. The Common Trust, a charity, owns the York Road and Gardner Road car parks. The privately owned Ferry Road Stable Field and the Millennium Foundation, a charity, provide temporary car parking at peak tourism periods on grazing land.
- 6.14 Applications to expand the number of bedrooms (typically to enhance income from holiday letting) are leading to the paving over of front gardens or locating parking in rear gardens to accommodate the required number of on-site car parking spaces. The first creates a car-dominated street scape. The second reduces the quality of outdoor amenity space for future occupants. This decreases the number of dwellings in Southwold that are attractive to families, who have a need for larger gardens. It also reduces biodiversity.

### **New Car Parks**

- 6.15 The Millennium Foundation is proposing to build a year-round car park and Visitor Centre. This land is ideally situated for permanent car-parking because it is at the entrance to the town and close to a circular footpath route linking the harbour and Pier.
- The car park could be sensitively landscaped and surfaced to preserve and enhance the character of the town and its bio-diversity. The Millennium Foundation has already planted an orchard of apple and pear trees at its boundary.

## **POLICY SWD7 – PARKING**

- A. Development proposals that create a demand for vehicle parking should meet the requirements of the Suffolk Highways Guidance 2019. Alternative levels of provision will only be supported if the application demonstrates a clear local benefit such as enabling the provision of affordable housing, community and employment space, and is of a high quality design that preserves and enhances bio-diversity.**
- B. Development proposals which include new on-site residential parking provision will be supported provided the scheme:**
- **does not result in a car-dominated street scape; and**
  - **preserves and enhance biodiversity; and**
  - **does not create an open frontage in areas where enclosed front boundaries prevail; and**
  - **preserves a good quality of garden amenity space for existing and future occupants of the site; and**
  - **uses permeable surfacing, where practicable. Where this cannot be achieved, proposals should demonstrate how surface water will be drained on-site in a sustainable fashion.**
- C. The use of on-street parking in order to satisfy the requirements of the Suffolk Highways Guidance 2019 should:**
- **be well integrated into the layout and street scene, ensuring safety and avoiding obstruction for all users, in particular pedestrians and cyclists; and**
  - **should demonstrate that there are available on-street parking spaces within peak demand periods to accommodate the additional demand in areas of parking stress (as shown on the policies map).**
- D. Development that results in the loss of existing off-street or on-street parking should provide the same number of new parking spaces in the Parking Zone in which the proposed development is located.**
- E. In determining applications that include parking provision, great weight will be given to achieving high quality design that respects the character and feel of Southwold, and to preserving and enhancing biodiversity.**

## 7 ECONOMY

- 7.1 The economy of Southwold is largely dependent on leisure and tourism. The largest employer in the area is Adnams, the brewer, hotelier and wine merchant which has a direct interest in tourism through its ownership of a number of pubs and restaurants.
- 7.2 Other local industries include construction and building maintenance (partly driven by the strong second home market), and a variety of service businesses, including a successful creative digital tech sector business. Southwold harbour includes a small fishing industry with locally caught fish sold from huts near the jetties, and a variety of marine services including boat building and repairs.

### Supporting a Diverse Retail Offer

- 7.3 Southwold's retail centre, which caters both to the needs of local residents in Southwold and Reydon and also to the tourism industry, is concentrated in a small number of streets, mostly in a tightly drawn town centre boundary. The total number of units is 77 and the total amount of floor space for Southwold is 7,635 m<sup>2</sup>. This is significantly less than the other market towns, including the next largest town, Halesworth, which has 96 units with a total of 10,626 m<sup>2</sup>.
- 7.4 Snapshots of Southwold's vacancy rate taken in 2017, showed a vacancy rate of 6.5% (5 shops), increased from 5.3% in 2016.<sup>53</sup> Based on observations, the vacancy rate is higher in January 2020 than in 2017. There were 5 charity shops, 5 empty shops and 2 occupied but advertised to let on 6<sup>th</sup> February 2020.
- 7.5 70% of respondents to the Southwold Town Plan Questionnaire thought the character of Southwold High Street 'very important'<sup>54</sup> and this was confirmed by the Neighbourhood Plan focus groups. This character derives partly from historic shop fronts and partly from the number of independent shops which are valued by visitors and local residents.
- 7.6 In recent years, Southwold has seen a decline in the number of independent businesses and an increase in national chains. Most of the national chains have moved into premises that have been enlarged through planning consents for extensions into rear courtyards and gardens. This has resulted in the loss of the small shop spaces that are suitable for independent businesses whose facilities needs are different from national chains.
- 7.7 The loss of small local shops is felt by the community and visitors to have diluted the High Street's distinctiveness. A 2018 "People and Places" Survey found that the presence of national chains was jointly ranked as the most negative perception by customers (58%); stopping the decline of independent businesses was amongst their top priorities for the future.<sup>55</sup> The Coastal Community Team Strategy<sup>56</sup> developed through community consultation, highlighted the importance of independent businesses to a vibrant town centre.
- 7.8 The strong representation of national chains on the High Street has also led to a dramatic increase in commercial rents which in turn has substantially increased the

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<sup>53</sup> Retail Impact Threshold Advice For Waveney District Council Final Report, Jan 2018, P. 15

<sup>54</sup> SNP Supporting Documents - Section 5

<sup>55</sup> Southwold Town Centre: A Forward Framework, <https://people-places.net/wp-content/uploads/Southwold-Town-Centre-Strategy-a-Forward-Framework-2.pdf>

<sup>56</sup> <http://www.eastsuffolk.gov.uk/business/regeneration-projects/coastal-communities-teams/southwold-coastal-community-team/>

rates burden, leading to further displacement of local independent shops. The closure of Southwold hospital and the relocation of the doctors' surgery to Reydon, which has reduced the footfall in the town centre, has also undermined the vitality of shops serving the needs of local residents.

- 7.9 The pressures created by rising rents and business rates and lack of suitable retail space, combined with the town's declining and aging year-round population and loss of regular trade, helps to explain why, despite the High Street's appearance of vibrancy, Southwold businesses are markedly more pessimistic than in comparable towns nationally. In 2018, a high proportion of businesses reported a negative performance over the last year: 35% said that turnover had decreased compared to 31% nationally. Nearly a third of Southwold businesses (32%) projected a further decline in turnover compared to just 19% nationally<sup>57</sup>.
- 7.10 The intention of Policy SWD8 is to retain small retail premises that suit the needs of independent businesses and also to preserve the distinctive character and appeal of Southwold's High Street. This policy is supported by the National Planning Policy Framework, which promotes "competitive town centres that provide customer choice and a diverse retail offer." The Primary and Secondary Shopping Frontages are defined in the Local Plan.

## **POLICY SWD8 – SMALL SHOP UNITS**

**In the Primary and Secondary Shopping Frontages, development proposals to increase the size of an existing retail unit by more than 40% of its existing floor space will only be supported where it can be demonstrated that they are essential to ensure the continued effective trading of the existing operator.**

### **Promoting Economic Resilience**

Tourism is by far the strongest sector in the area and will continue to be promoted in a way that is consistent with protecting and promoting Southwold's natural environment and heritage. However, diversification from tourism is necessary to attract a greater range of employment opportunities.

- 7.12 Reviewing the success of entrepreneurs in setting up businesses in other seaside towns, the Centre for Entrepreneurs notes<sup>58</sup>:

*'a passive reliance on tourism will not be enough for seaside towns to fulfil their potential. What's needed ... is a transformation in the way seaside towns view themselves, as well as how they educate their children and manage their infrastructure.*

*Seaside towns need entrepreneurs to bring ideas, jobs, and wealth to their communities; but entrepreneurs need talent, infrastructure, and public support to help them lead the revitalisation of seaside towns.'*

<sup>57</sup> Southwold Town Centre: A Forward Framework, <https://people-places.net/wp-content/uploads/Southwold-Town-Centre-Strategy-a-Forward-Framework-2.pdf>

<sup>58</sup> [https://centreforentrepreneurs.org/wp-content/uploads/2015/11/Seaside\\_Entrepreneurs\\_Report\\_WEB1.pdf](https://centreforentrepreneurs.org/wp-content/uploads/2015/11/Seaside_Entrepreneurs_Report_WEB1.pdf)

- 7.13 Southwold Town Council, the Coastal Communities Team Economic Plan for Southwold<sup>59</sup> and the Southwold and District Chamber of Trade and Commerce (SDCTC) support attracting to the town small-scale service businesses. With good broadband connections, the location of businesses is less sensitive than it used to be and the benefits of working and living in Southwold's high quality environment would be attractive to many start-up, micro (under 10 employees) and small (under 50 employees) businesses.
- 7.14 The community supports the creation of a more diverse economy and more business space. In the Neighbourhood Plan survey, support for 'non-tourism-based businesses' was the first or second priority for nearly 60% of respondents, with start-up units for new businesses being a priority for over 50%. In addition, 84% of respondents thought it important or very important for 'small, flexible-use premises for small and start-up businesses' to be provided. 59% of respondents wanted the old hospital site used for low rent facilities for start-up businesses. The need for business meeting rooms was also highlighted by the business leaders Focus Group<sup>60</sup>.
- 7.15 The East Suffolk economy (9,300 businesses in total) has a very high percentage of micro-businesses and a high incidence of self-employment.<sup>61</sup> Southwold mirrors this pattern, with 34% self-employment compared to an average of 15% for England and Wales. East Suffolk Economic Growth Plan, 2018-2023 has identified that a significant barrier to economic growth is the insufficiency of existing provision for micro and small businesses, the limited move-on space and the reluctance of developers to build speculatively. Providing appropriate workspace and premises to enable micro and small enterprises to thrive is one of the pillars of its economic strategy.<sup>62</sup>
- 7.16 The Local Plan supports the Economic Growth Plan: *“Central to meeting jobs needs and securing a supply of premises to accommodate these is protecting suitably located and designed existing premises in employment use. Rental and freehold values for non-employment uses are often much higher than employment uses. This means premises in existing employment uses can become under threat from conversion. Additionally, replacement new-build employment premises are difficult to make financially viable. The conversion of existing employment premises to other uses reduces the supply of employment premises and reduces the choice in the market for premises particularly for smaller local businesses”*.
- 7.17 Since 2000, Southwold has lost significant amounts of space suitable for businesses<sup>63</sup>. The little remaining business space is chiefly in the Southwold Business Centre on St Edmunds Road and in the Reydon Business Park, located a little less than a mile outside the Neighbourhood Plan area. The latter provides facilities for 22 businesses; some have relocated from Southwold because of their inability to find adequate or affordable space. The East Suffolk Economic Development Team confirms that “all units at Reydon and the Southwold Business Centre are full to capacity with no

<sup>59</sup> <http://www.eastsuffolk.gov.uk/assets/Business/Coastal-Community-Teams/Southwold-Coastal-Community-Team-Economic-Plan-summary.pdf>

<sup>60</sup> SNP Consultation Documents - Section 2.2

<sup>61</sup> East Suffolk Economic Growth Plan, pp 6-9 <https://www.eastsuffolk.gov.uk/assets/Business/East-Suffolk-Growth-Plan.pdf>

<sup>62</sup> East Suffolk Economic Growth Plan, p4 <https://www.eastsuffolk.gov.uk/assets/Business/East-Suffolk-Growth-Plan.pdf>

<sup>63</sup> SNP Supporting Documents - Section 4.6

specific representation of sector.”<sup>64</sup> It also advises that when space has been created in other rural areas, it has quickly filled to capacity.

- 7.18 For people without adequate space for a home office, and for start-up and growing businesses, the ability to access workspace on flexible terms (including affordable rents) is one of the most important factors in deciding where to locate a business. Whilst the matter of flexible terms is not a land use matter, the promotion of business premises with such arrangements would be particularly welcomed.
- 7.19 Having additional Class E space available in the town creates the potential to attract incomers, encourages new start-ups by people living in the area, and retains businesses within the town that are out-growing their space. Accordingly, opportunities to develop business spaces of various sizes, including meeting rooms, should be encouraged.
- 7.20 Ideally, E space would be created through new-build provision as part of a larger new development which could potentially cross-subsidise the provision of start-up units and space at attractive rents. This could potentially be achieved in Station Yard, one of four development sites identified in Section 10.
- 7.21 Given the limits on development space within Southwold, alternative provision could be made in existing employment or community premises that are no longer in use or through flexible and creative use of other space, for example, space above shops.

## **POLICY SWD9 – SOLO WORKERS, MICRO BUSINESSES**

**Development proposals to provide start-up and/or grow-on business space (Class E) will be supported through the conversion of existing buildings or the provision of new buildings within the settlement boundary, and on the Station Yard development site in particular.**

### **Protecting Existing Employment Space**

- 7.22 The Local Plan Policy WLP8.12 states that “Neighbourhood Plans may identify additional premises or clusters of premises outside of Existing Employment Areas within use classes B1, B2 and B8 for protection from redevelopment or change of use if local evidence supports it.”
- 7.23 There are two important clusters of employment premises that are not included in the Local Plan.
- 7.24 The first is the Adnams’ work space in the heart of the Old Town – the brewery, distillery, whisky dunnage, main office and engineering workshop located on Victoria Street, Church Street, Cumberland Road and East Green. Loss of this employment space would have profound negative ramifications for the town’s economy.
- 7.25 The second is the Southwold Business Centre. This is a cluster of buildings off St Edmund’s Road accommodating a number of small businesses, including the Dome Art and Antique Centre (which has an international reputation for its Arts and Crafts

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<sup>64</sup> SNP Consultation Documents - Section 3

era specialisation) the Suffolk Pilates Centre, and Suffolk Summer Theatre's scenery workshop. The space is a valuable mix of work and warehouse units of a variety of sizes for businesses that do not need a High Street location and require low cost space. Provision of this type supports a diverse economy in Southwold.

- 7.26 Retaining both of these clusters of employment space would not have a significant adverse impact on surrounding land uses. Non-employment properties which are clearly residential are not covered by policy SWD10.

## **POLICY SWD10 – EXTENSION OF EXISTING EMPLOYMENT AREA**

**The Local Plan's Existing Employment Area is extended as shown in the map in section 15.2 to include employment areas:**

- i. The complex of Adnams plc employment space on Church Street, Victoria Street, Cumberland Road and East Green;**
- ii. The Southwold Business Centre, off St Edmund's Road**

**Development proposals in the two areas should comply with the requirements of Waveney Local Plan Policy 8.12 (Existing Employment Areas).**



## 8. NATURAL ENVIRONMENT

- 8.1 Southwold is located in an exceptional natural landscape of common, marshes, beaches and dunes. This is valued both by residents and visitors to the town and is a major part of the attraction of Southwold as a tourist destination. It is essential that development respects and enhances this natural environment.
- 8.2 Suffolk County Council aspires to make Suffolk the greenest county through the Greenest County Partnership. The key themes of this partnership are climate mitigation, climate adaptation and protection and enhancement of the natural environment. These themes are crucial for this Neighbourhood Plan.
- 8.3 East Suffolk Council has developed a Recreational Avoidance and Mitigation Strategy (RAMS) to mitigate recreational disturbance impacts caused by new development on habitats sites. The approach set out in the RAMS document will apply across the Neighbourhood Plan area.
- 8.4 The SNP Natural Environment policies support and enhance the RAMS approach by requiring Southwold's mainly small scale development to preserve and enhance natural habitat on-site.
- 8.5 Southwold includes and is surrounded by areas designated to be of high wildlife value. To the south, the Minsmere-Walberswick Heaths and Marshes Site of Special Scientific Interest (SSSI) includes the Town Marshes. The Minsmere-Walberswick Special Protection Area (SPA), Minsmere-Walberswick Heaths and Marshes Special Area of Conservation (SAC) and the Minsmere-Walberswick Ramsar site lie slightly further to the south and west. The north border of the town stops just short of the Pakefield to Easton Bavents SSI, with Pakefield–East Bavents SPA and Pakefield-Easton Bavents Lagoons SAC further north
- 8.6 In addition, there are six County Wildlife Sites within or adjacent to the town:
- the Southwold Denes
  - Buss Creek
  - Easton Marshes
  - the Reydon Fishing Lakes
  - Reydon Marshes
  - St Felix School Grounds.
- 8.7 Buss Creek is an important ornithological site. In a 2007 survey<sup>65</sup> 114 species were recorded in the creek and adjacent reed beds, these included water vole, seven species of dragonflies and grass snakes.
- 8.8 Since 2014, two amateur ornithologists who live in the town have identified 170 bird species, many uncommon, within two kilometres of Might's Bridge<sup>66</sup>. The majority were recorded within one kilometre of the boating lake.

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<sup>65</sup> Suffolk Wildlife Trust 2007, *Southwold and Reydon Wildlife Audit*  
<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Open-Space-Needs-Assessment-2015/02-Biodiversity-Distribution.pdf>

<sup>66</sup> <http://www.southwold-northroad.com/page6.htm> The audit is ongoing.

- 8.9 The Buss Creek Marshes (reed bed and marsh habitat) and the Common are important areas of undesignated wildlife habitat.
- 8.10 Southwold beach is of exceptional importance for tourism and is the subject of major study and concern in the Suffolk Shoreline Management Plan (2010)<sup>67</sup>. The current policy is that in the medium term a natural shingle barrier should be allowed to develop north of Southwold Pier when the cliff at Easton Bavents is eventually breached by erosion. This is seen as the key to maintaining a supply of sand for Southwold beach. The Plan recognises that a consequence will be the need to develop a defence for North Road and south Reydon from storm surges.
- 8.11 The Common, which includes a mixture of sports pitches, a golf course, and common land also has no formal designation, but it is of County Wildlife Site quality for its reptiles and for the large areas managed specifically as skylark habitat. It has excellent connectivity to the larger habitat block of the Woodsend and Town Marshes (part of the Minsmere-Walberswick Heaths and Marshes SSSI).
- 8.12 The blocks of interconnected wildlife habitats<sup>68</sup> help form an ecologically coherent network that allows species to move between sites, which is essential to more robust populations. Equally important are 'stepping stones' between the blocks, which insects, birds and small mammals used to move between the blocks<sup>69</sup>. Gardens and town green spaces can be managed to act as stepping stones if they are planted to promote wildlife habitat. Indeed, wildlife audits in different parts of the UK and internationally have established the importance of suburban gardens and parks to compensating for the decline in rural wildlife habitat caused by modern farming techniques<sup>70</sup>.
- 8.13 One of the Town Council's strategic objectives is to improve the natural environment and the following steps have been taken to meet this objective:
- creating wildflower and pollinators gardens throughout the town;
  - in conjunction with the Common Trust, planting trees, rewilding selected areas within the Town and the Common, and developing a management plan for the Common and the Marshes with the support of the Suffolk Wildlife Trust.
- 8.14 The Coastal Communities Team<sup>71</sup> public consultation on an economic strategy for the town found that improving the natural environment was a community priority and is developing policies relating to the boating lake and lagoon, Buss Creek Marshes and Southwold Town Marshes.
- 8.15 The use of dwellings for second homes and holiday lets often works against this community priority in two ways. Firstly, there is the loss of gardens to infill development to enhance the value of an investment. Secondly, gardens are often paved to provide for additional off-street parking and to be maintenance-free.

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<sup>67</sup> <http://www.eastsuffolk.gov.uk/environment/coastal-management/shoreline-management-plans/>

<sup>68</sup> SNP Supporting Documents - Section 6.1

<sup>69</sup> Suffolk Wildlife Trust (2007) *Southwold and Reydon Wildlife Audit, for Waveney District Council*

<sup>70</sup> M. Goddard, A. Dougill and T. Benton (2010) *Scaling up from gardens: biodiversity conservation in urban environments, Trends in Ecology and Evolution, Volume 25, Issue 2, pp90–98, February 2010*  
<https://www.sciencedirect.com/science/article/abs/pii/S0169534709002468>

<sup>71</sup> <http://www.eastsuffolk.gov.uk/assets/Business/Coastal-Community-Teams/Southwold-Coastal-Community-Team-Economic-Plan.pdf>

- 8.16 At the local scale, the design of individual buildings and of green and open spaces, will help to ensure that many of the species that are in Southwold can not only survive but thrive. This is crucially in line with the national planning guidance for achieving net biodiversity gain through all new development (NPPF, 2019). Examples of such features could include bird boxes, bat boxes, nectar rich planting schemes for pollinators, native trees and shrubs, hedgehog runs and crevices and plantings between paving stones.

## **POLICY SWD11 – PROVISION FOR WILDLIFE IN DEVELOPMENT**

**As appropriate to their scale, nature and location, development proposals should incorporate features which provide net gains to biodiversity.**

- 8.17 Southwold's' gardens, including small paved courtyards, provide amenity for residents (including a sense of surrounding space); create an attractive streetscape; help to shape the character of different parts of the town; make an important contribution to bio-diversity, and support a range of housing suitable to people at different life stages.
- 8.18 Because much of the housing in the town consists of terraces or semi-detached houses, many gardens consist of a small area in the front that sets the dwelling back from the street, and a longer narrow rear garden. However, there are a number of larger gardens – chiefly in the Town Farm Character Area but also to be found in other parts of the town – which contribute to the supply of housing that is suitable for families. Maintaining a supply of houses with large gardens is essential to achieving one of the Town Council's strategies for the town – reversing demographic decline by attracting families to live in the town.
- 8.19 The Conservation Area Appraisal 2008 and the Character Area Appraisal identify gardens that make an important contribution to the character of the town and so should be preserved from development. These are not exclusive lists. In the same way that an undesignated heritage asset may be identified through a planning application, gardens that make a positive contribution may likewise be identified.
- 8.20 Southwold's' gardens act as 'stepping stones' between blocks of interconnected wildlife habitats that help to compensate for the decline in rural wildlife habitat caused by modern farming techniques. It is therefore important to protect garden space in order to allow biodiversity to thrive.
- 8.21 The chief threat to gardens in Southwold comes from cumulative small scale in-fill development (either extensions or stand-alone structures) that has successively enlarged the footprints of original structures, resulting in the erosion of significant amounts of garden space. Some extensions and structures in gardens are permitted development and as such do not need planning permission. The major impact of the erosion of garden space is seen in the Conservation Area but increasingly applications for the Town Farm character area are reducing garden space. A more recent trend is applications for permanent garden infill structures purportedly for ancillary uses (office/studios, game rooms, granny annexes), which are subsequently converted to

holiday lets. Robust enforcement is required to prevent the undermining of planning policies and decisions.

- 8.22 In light of the cumulative impacts of un-controlled infill of gardens in recent years, stronger protection of garden space is required.

## **POLICY SWD12 – LOSS OF PRIVATE GARDEN SPACE**

**Development proposals in gardens and courtyards will only be supported where the following criteria are satisfied:**

- a) The size of the remaining garden is generally consistent with the predominant pattern of garden spaces in the surrounding character area; and**
- b) The scale, design and siting of the proposal will not detract from the visual amenity of the streetscape; and**
- c) Where vegetation is removed, detailed landscaping plans are provided for the re-greening of the site with replacement vegetation that promotes wildlife habitat.**

**In addition, proposals for development in gardens which are identified in the Southwold Conservation Area Appraisal or Southwold Character Area Appraisal as making a positive contribution to the character of the area should demonstrate the way in which they retain or enhance the character of the garden space through their design, layout and use of materials. Development proposals which would have an unacceptable impact on the character of such garden spaces will not be supported.**

**Insofar as planning permission is required, proposals for garden structures with associated living space will be supported where they comply with the following criteria:**

- they are ancillary to the main residence;**
- car parking can be provided within the curtilage of the building in accordance with Policy SWD7 (Parking); and**
- they would not have an unacceptable impact on residential amenity or the operation of community services.**

### **Local Green Spaces**

- 8.23 Under the NPPF, neighbourhood plans have the opportunity to designate Local Green Spaces which are of particular importance to the local community. This will afford protection from development other than in very special circumstances. Paragraph 100 states that Local Green Spaces should only be designated where the green space is

*a) in reasonably close proximity to the community it serves;*

*b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

*c) local in character and is not an extensive tract of land.*

8.24 The areas that have been identified by the community as being of value to them and in need of protection fall into six categories:

- Allotments
- Common land (but not with the formal definition of 'registered common land')
- Grazing marshes
- Public greens
- Open spaces currently used for parking
- Play and recreation areas

<b>Allotments</b>	<b>Owner</b>
Blyth Road allotments	Southwold Town Council
Former allotment opposite junction of St Edmunds Road and North Road	Southwold Town Council
Station Road allotments	Southwold Town Council
<b>Common Land</b>	<b>Owner</b>
The Common, playing fields, golf course, tennis courts and Pit	Common Trust
<b>Grazing Marshes</b>	<b>Owner</b>
Buss Creek marshes, from sea to River Blyth	Southwold Town Council
Havenbeach marshes	Southwold Town Council
Salt marshes	Southwold Town Council
Southwold Town marshes	Southwold Town Council
Woodsend marshes, including Golf Club practice ground	Southwold Town Council
<b>Public Greens</b>	<b>Owner</b>
Barnaby Green	East Suffolk Council
Bartholomew Green	East Suffolk Council
Church Green	East Suffolk Council
East Green	East Suffolk Council
Electricity Green	Southwold Town Council
Green and shelter below North Parade	Southwold Town Council
Green between North Parade and cliff	East Suffolk Council
Gun Hill	East Suffolk Council
North Green	East Suffolk Council
Nursemaids Park	Common Trust
St Edmunds Green	East Suffolk Council
St Edmunds Churchyard	Church of England
St James Green	East Suffolk Council

Skilman's Hill	Common Trust
South Green	East Suffolk Council
The Paddock	Common Trust
<b>Open spaces currently used for parking</b>	<b>Owner</b>
Ferry Road car park	East Suffolk Council
Godyll Road car park	Southwold Town Council
Grass strip along Marlborough Road	East Suffolk Council
Parking area between Nursemaids Green and Strickland Place	Common Trust
Harbour car park	East Suffolk Council
Millennium car park	Southwold Millennium Foundation
Parking area along west side of Gardner Road	Common Trust
Pier car park	East Suffolk Council
York Road car park	Common Trust
<b>Play and Recreation Areas</b>	<b>Owner</b>
Blackshore	East Suffolk Council
Boating Lake and Lagoon	Southwold Town Council
Caravan and Camp Site	East Suffolk Council
Cliffs and Denes	East Suffolk Council
Klondyke Recreation Area	Southwold Town Council
Promenade	East Suffolk Council
Putting Green	Southwold Town Council
Tennis courts in Hotson Road	East Suffolk Council
Tibby's Green	Southwold Town Council

- 8.25 Areas under the categories 'Common Land', 'Grazing Marshes', 'Play and Recreation Areas' and 'Allotments' are considered to have sufficient protection under the existing East Suffolk Council planning policy framework and/or are directly owned by Southwold Town Council or the Southwold Common Trust.
- 8.26 This NP designates ten of the public greens, all owned by East Suffolk Council, as local green spaces meriting special protection. All are small areas of land measuring between .02 and .98 hectares situated within the Southwold Conservation Area
- 8.27 All are designated within the Southwold Conservation Area Appraisal (2008) as open green spaces to be retained<sup>72</sup>.
- 8.28 The Southwold Conservation Area Appraisal has identified the designated greens as 'a special feature of the borough' that 'contribute to Southwold's reputation as one of the 'most picturesque seaside towns in England ... Southwold's greens and other spaces including the Market Place invite both the native and the visitor to linger. The greens come in all sizes, from the diminutive Church Green to the expansive South Green where the six sentinel cannons guard the cliff top... Some appear to be space left by the junction of roads, for example North Green or Barnaby Green. Others appear to be the consequence of bequests to the community of parcels of land whose shape is based on ancient and long forgotten field boundaries. The latter type are the most

<sup>72</sup> Southwold Conservation Area Appraisal (2008), pp 17, 21, 35, 39, 47.

extensive and include South Green, St Edmund's Green and Bartholomew's Green. The greens, planted with mown grass, and enclosed by hedges or bushes (excepting South Green) are landscape dominated and of comparative low building density and are managed for public amenity.' The greens enable many of the key views within and from Southwold.<sup>73</sup>

- 8.29 The Waveney Open Space Needs Assessment 2015<sup>74</sup> noted the greens were 'important to the townscape and street scene' of Southwold'. It recommended that, because of the lack of parks or gardens in Southwold and Reydon, 'Existing open spaces that provide a variety of uses for rural communities should be protected and enhanced to retain the high value.'
- 8.30 All of the greens are highly valued by the community not only because they provide amenity space for residents in what is otherwise a densely developed town, but also because individually and collectively they define Southwold's special character, a fact recognised by the Conservation Area Appraisal. It is therefore considered important to protect these spaces from development.
- 8.31 The Waveney Open Space Needs Assessment also recommended that:

*'Providing ancillary facilities such as seating and planting on passive amenity spaces could assist with creating walking routes to destinations such as the village centre, beach or the playing field that could encourage people to be more active.'*

Therefore any ancillary provision which helps to improve the more active enjoyment of these spaces will be permitted. However, these must be generally ancillary uses, for example, signage, litter provision or benches and tables. The connectivity between the green spaces should also be improved through the use of features to encourage wildlife, including native planting, scrub, trees, hedgerows and ponds.

The Public Greens that are designated as Local Green Spaces, shown below, are shown in sections 15.3 – 15.6.

Policy SWD13 follows the matter-of-fact approach in the NPPF. In the event that development proposals come forward on the Local Green Spaces within the Plan's period, they can be assessed on a case-by-case basis by East Suffolk Council. In particular it will be able to make an informed judgement on the extent to which the proposal concerned demonstrates the 'very special circumstances' required by the policy.

Their sizes are set out in the schedule below.

<b>Designated Local Green Spaces</b>	<b>Area in Hectares</b>	<b>Designated Local Green Spaces</b>	<b>Area in Hectares</b>
<b>South Green</b>	0.97	<b>Barnaby Green</b>	0.02
<b>Gun Hill Green</b>	0.97	<b>North Parade Green</b>	0.34
<b>Bartholomew Green</b>	0.23	<b>East Green</b>	0.08
<b>St Edmunds Green</b>	0.34	<b>St James Green</b>	0.06
<b>North Green</b>	0.10	<b>East Cliff Green</b>	0.03

<sup>73</sup> Southwold Conservation Area Appraisal (2008), pp. 3-5, 9, 13, 15

<sup>74</sup> <http://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Open-Space-Needs-Assessment.pdf>

## South Green



The most famous of Southwold's greens, it extends the length of Queen Street down to the junction with Ferry Road and runs east to the sea merging with Gun Hill. Both were originally town pasture. It is used by residents and visitors for walking, picnicking, family ball games, and enjoyment of the views. It is the site of the annual Charter Fair, which dates back to the 15<sup>th</sup> century, and other community events such as the annual Antiques Fair and Jazz on the Green.

## Gun Hill



An iconic green in Southwold, with the historic cannons donated to the town after the Battle of Sole Bay in the 17th century. Apart from the cannons Gun Hill remained undeveloped until c. 1807 when it was protected by a group of 'shareholders' to whom it had been leased by the Corporation. They built a line of superior residences each with its own land around the west side of the crown of the hill. Today, it is used by residents and visitors in the same way as South Green. A common sight is parents photographing their children astride the guns or playing family ball games on the green during the summer.



### Bartholomew Green



Bartholomew Green, together with St. Edmund's Green, Church Green, and Tibby's Green (a playground) create a continuous green space surrounding the Grade I listed 15<sup>th</sup> century St Edmund's Church. In the late Middle Ages, Bartholomew Green was the location of the market place, fair ground and a guildhall. Today, it has formal garden borders and mature trees, the town's War Memorial, and a set of antique stocks. It is used by residents and visitors for walking, sitting, enjoying the view, doing exercises, and as a footpath to the north side of town. Community events, including the annual Remembrance Day ceremony, take place here.

### St Edmund's Green



Also called Hospital Green, it is part of the setting of the Grade I listed 15<sup>th</sup> century St Edmund's Church and is used for walking, resting, a site for outdoor community events, and as a footpath linking the primary school to the library. Its association with the former Southwold Community Hospital, which was built by the community, creates a strong sense of community attachment for local people. Since this photo was taken, a row of trees alongside the path has been planted by children from the Primary School.

### North Green



A small local green with circular gardens that provides a footpath into the town centre and makes an important visual contribution to the entrance to the town. It is close to Tibby's Green, a children's playground behind St Edmund's Church and forms a pedestrian green space passageway from the town's entrance to St Edmund's Church, and the Southwold Arts Centre. There are plans to replant the formal beds to create pollinator habitat.

### Barnaby Green



A small green close to the Common which forms a wildlife corridor between the Common and St Edmund's churchyard, both open space areas of high value wildlife habitat. It is enjoyed and looked after by local residents who use it for picnics in the summer. It is decorated with lights at Christmas.

### North Parade Green



Runs from the pier to East Green and contributes to the iconic view of the Southwold sea front. It has benches and formal garden areas. It is used by visitors and residents to enjoy the sea air and view, and for picnicking.

### East Green



A small green space with mature trees. One of these is a Verdun oak tree, one of a number planted in the United Kingdom in the aftermath of the First World War. Acorns and chestnuts were collected from trees on Verdun battlefield and sent to England to be distributed and planted as war memorials. The green is opposite the Adnams Brewery and, according to the Conservation Area Appraisal, its wide dimensions help to mitigate the size and scale of the brewery buildings.

### St James's Green



A picture-postcard view of Southwold with a cannon, flag pole, and benches facing the sea. It provides the most important view of the town's iconic light house, a Grade II listed building. The Conservation Area Appraisal notes that 'Victoria Street is an example of a linear space, of special interest because of the way it connects a 'chain' of four greens; Bartholomew Green, East Green, Church Green and St James' Green.

### East Cliff Green



Visually, this green is an extension of the North Parade greens and constitutes the end point of the open public spaces facing the sea, which begin at the Pier. It includes a formal circular shrubbery and benches. A common sight is visitors and residents sitting on the benches enjoying fish and chips purchased at Southwold's popular Little Fish Shop on nearby East Street.

## **POLICY SWD13 – LOCAL GREEN SPACES**

The following areas, as shown on the maps in Section 15.5 – 15.8, are designated as Local Green Spaces:

- **South Green**
- **Gun Hill**
- **Bartholomew Green**
- **St Edmund's Green**
- **North Green**
- **Barnaby Green**
- **North Parade Green**
- **East Green**
- **St James's Green**
- **East Cliff Green**

**Development proposals within the designated local green spaces will only be supported in very special circumstances.**

### **Flooding and drainage**

- 8.32 Suffolk County Council is the Lead Local Flood Authority in Suffolk and has a coordinating role on management of surface water and flooding with the Environment Agency responsible for managing flooding from rivers and the sea, and Anglian Water responsible for managing flooding from their own assets. The relevant national policy with regards to flooding is NPPF paragraphs 155 to 165. Locally, flooding is addressed by policy WLP8.24 of the Waveney Local Plan. The Neighbourhood Plan clarifies local issues and implications.
- 8.33 Southwold experienced a major flood disaster in 1953, during which four lives were lost and substantial damage to property and land occurred. Since then a succession of flood protection defences have been built, which have mitigated against any serious recurrence of this experience. The continuing effects of erosion north of the town and of rising sea levels associated with the Climate Change Emergency mean that the town has to exert continued vigilance about flooding issues and encourage adaptation and mitigation.
- 8.34 Areas of the town which might be considered for development and which are in designated flood risk zones (either directly from the sea or through breaching of the banks of the River Blyth) include Blackshore, Ferry Road, Millennium Hall car park, Mights Road and North Road. The Environment Agency's Flood Risk map for the area shows these locations to be at risk of flooding over the next century. Developments in such areas should be accompanied by a Flood Risk assessment. In addition, localised surface water flooding occurs from time to time following periods of intense rainfall.

Streets that have reported experiencing such incidents in the past three years<sup>75</sup> include Centre Cliff, Ferry Road, Hotson Road, North Parade, North Road, South Green, St James Green and The Common.

- 8.35 Southwold is served by an antiquated waste-water and sewage system, about which the Town Council, Reydon Parish Council and the Southwold and Reydon Society have expressed concerns that it is at the limit of its capacity. While the utility provider, Anglia Water, have not reported capacity issues, it is recommended that new developments seek to minimise the load placed on the system.
- 8.36 Development will therefore have to ensure that it minimises the potential for all types of flooding, including surface water. Surface level flooding can be addressed through a range of flood mitigation measures, both for the scheme as a whole and for individual buildings.
- 8.37 Additionally, it is not acceptable for new development to require measures that could worsen flooding impacts elsewhere, such as the loss of open watercourses. The creation of new culverts will not be viewed favourably as these contribute to localised flooding.
- 8.38 Positive actions to reduce flooding across the parish will be welcomed. For example, where there are existing culverts and development creates the opportunity to open these up, then proposing to do so will likely result in reduced risks of localised flooding, therefore will be viewed favourably.
- 8.39 New developments will be expected to incorporate sustainable drainage systems (SuDS) where feasible, guided by SuDS best practice<sup>76</sup>. Ideally SuDS should be at or near the surface, providing water quality, biodiversity and amenity benefits and reducing flood risk. Given that most development is expected to be on brownfield land, a principal aim should be for development to minimise discharge rates. Current best practice indicates that rates should be reduced by a minimum of 30%<sup>77</sup>.

## **POLICY SWD14 – MINIMISING THE IMPACT OF FLOODING**

**As appropriate to their scale, nature and location development proposals should:**

- A. Mitigate flooding from all sources (fluvial and pluvial)**
- B. Provide appropriate Sustainable Drainage Systems (SuDS) which minimise discharge rates unless it can be shown to be inappropriate. SuDS should be well integrated into a development and provide multifunctional benefits, such as landscaping, open space and biodiversity gains; and**
- C. Provide for rainwater harvesting where practicable.**

**Development proposals in flood attenuation areas which would reduce the ability of the area concerned to alleviate flooding will not be supported.**

<sup>75</sup>SNP Consultation Documents - Section 1.8

<sup>76</sup> Suffolk Flood Risk Management Partnership (2014): Suffolk Surface Water Drainage (SuDS) Guidance, Standards and Information. <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/19431E-FRM-SuDS-Guidance-Appendix-A-v12.pdf>

<sup>77</sup> CIRIA (2015) SuDS Manual [https://www.ciria.org/Resources/Free\\_publications/SuDS\\_manual\\_C753.aspx](https://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx)

## 9. COMMUNITY FACILITIES

- 9.1 Community facilities are the life blood of Southwold, not only for its residents and visitors but also for the surrounding parishes. They support group activities of all kinds. They may also provide vital public services. They enable people to connect and socialise. They foster a sense of identity and well-being, and promote community cohesion. The loss of community facilities, such as the doctors' surgery, which draw people into the town, has had an adverse impact on other community facilities such as the Post Office and shops serving local needs because of loss of footfall.
- 9.2 It is therefore important that existing community facilities be retained, and that additional facilities be created to accommodate new community needs over the life time of the Neighbourhood Plan. This is supported by the Southwold Town Strategy 2019 which identifies the need to protect, maintain and enhance the town's community assets.
- 9.3 Policy 8.22 of the Waveney Local Plan (Built Community Services and Facilities) already seeks to encourage new community provision and to protect the existing uses of community buildings unless there is clear evidence they are not needed or viable. Policy SWD15 supports this policy by ensuring that landowners actively engage with the community to support the retaining of community facilities for the same or alternative community uses. Community uses are further defined in section 8.118 of the Waveney (now ESC) Local Plan: community facilities may include local shops, meeting places, educational and medical facilities, sports venues, cultural buildings, public houses and places of worship.
- 9.4 There are three co-located waste facilities to the north of the town: the Anglia Water Waste Water Recycling facility, the Sole Bay Recycling secondary aggregate recycling facility and the Sole Bay Car Spares Metal and End of Life Vehicles facility. Policy MP18 of the SMWLP safeguards these sites to ensure their continued use.

### **POLICY SWD15 – LOSS OF COMMUNITY FACILITIES**

**Proposals that would result in the loss of a community facility and no suitable re-provision for the same or an alternative community use elsewhere in the neighbourhood area will only be supported where:**

- A. All the requirements of Waveney Local Plan Policy WLP8.22 (Built Community Services and Facilities) are met; and**
- B. It can clearly be demonstrated that all reasonable efforts have been made to engage with bodies that may have an interest in taking on the running and operation of the facility for its existing or an alternative community purpose.**

## 10 DEVELOPMENT SITES

- 10.1 Southwold's situation as an island surrounded by water and marshes and within a sensitive natural environment in the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), restricts development sites to brownfield land within the town boundary. There are few development sites which are available and expected to come forward during the Plan period (see section 15.2). The key sites are:
1. Millennium Field, Might's Road
  2. The Police Station site, Blyth Road
  3. The Fire Station site, Station Road
  4. Station Road Courtyard, Blyth Road
- 10.2 It is important that an integrated approach to development takes place on Sites 1-4 and immediately adjacent areas – all are located in an area of visual sensitivity. They form the entrance to the town and have high visibility within the AONB. Station Road Courtyard is within the Conservation Area and the police station is part of the setting of the Conservation Area.
- 10.3 In 2017, the Town Council adopted for inclusion into the Neighbourhood Plan a Design Framework for the Front of Town by Ingleton Wood Architects. The Design Framework mitigates the risks associated with piece meal development through a unifying and cohesive vision that makes optimum use of the land. Policy SWD16 ensures that all development in the entrance of the town (see section 15.3), in the area from the Millennium Field and Stella Peskett Hall to Pier Avenue, Station Yard, and Blyth Road is aligned with the principles and guidance set out in the Ingleton Wood Design Framework.
- 10.4 To reduce car use, promote health and well-being, and provide safe access routes for pedestrians, development of the proposed car park and visitor centre at the Millennium Field along with the fire station and police station sites should include a new off-road pedestrian route linking the Buss Creek footpath to the Blyth Road footpath.
- 10.5 The Neighbourhood Plan has identified a need to provide more permanently affordable housing that meets local needs as well as the need for small-scale workspace, including retail space suitable for independent businesses. In addition, there is a recognised need to protect existing community services where these are viable and also to ensure sufficient community space to meet changing needs. There is a recognition that such services will, increasingly, need to be developed and managed by the community. But for this to happen, there needs to be land available at a price that is within the reach of community groups. Otherwise opportunities for community-led development could be lost.
- 10.6 The development of these four sites will address the objectives of the Neighbourhood Plan by delivering the uses described below.

### **Millennium Field**

- 10.7 This field, opposite the Stella Peskett Hall, a community facility, was gifted by the Town Council to a charity, the Millennium Foundation, which is proposing to develop it as a visitor centre and year-round car park. There is a need to relocate the cycle hire and repair services in Station Yard when it is redeveloped; use of the Field for this and other sustainable transport facilities is supported.



### **Police Station site**

10.8 The Police and Crime Commissioner (PCC) has declared this site redundant and has moved most police services to Halesworth. The site is currently designated as an Asset of Community Value. During the duration of the Neighbourhood Plan, this site is appropriate for alternative community uses that could be subsidised by permanently affordable housing provided by a CLH group in accordance with Policy SWD1.

### **Fire Station Site**

10.9 The fire station has been moved to Reydon and the land is vacant; thus this site is not covered by Policy 8.22 of the Local Plan. Suffolk County Council has agreed to sell the site to Hastoe Housing Association for the development of in excess of 10 affordable homes, cross-subsidised by a small number of market houses. All of the housing should be designated for principal residence use pursuant to Policy SWD4.

### **Station Yard**

10.10 The Town Council, which owns this site, obtained planning permission in 2019 for small scale B1 and A1/A3 retail uses and two flats. A grant application was submitted to the Coastal Communities Fund with a business plan was developed that recommended changing the scheme to predominantly B1, with a small element of A1. On the basis of this business plan, the Coastal Communities Fund awarded a grant of c £800,000 to build Station Yard as an Enterprise Hub with an additional c £200,000 to pay a Town Manager team to develop the Town's economy.

10.11 These development sites will have a significant impact on pedestrian and cycle safety and traffic congestion on Mights Road/Station Road. As noted earlier, in the busiest times of the year, there can be as many as 5,000 vehicles entering Southwold daily. The mini-roundabout at the corner of Pier Avenue and Station Road causes lengthy queues. There is only one pedestrian crossing point, located by the roundabout, and this is not clearly designated or safely positioned.

## **POLICY SWD16 – DEVELOPMENT SITES**

- A. Proposals for the redevelopment of sites within the settlement boundary of Southwold will be supported where they incorporate a mix of uses includes one or more of the following uses:**
- i. Residential units that address local housing needs, in line with Policies SWD1-3 (Affordable Housing);**
  - ii. Small-scale employment space, especially Class E space suitable for solo working, micro and small businesses, and small scale retail units; and**
  - iii. Community space where there is a demonstrable need for such provision.**
- B. In particular, some or all of the uses set out in Part A above should be incorporated within the development of the following sites (and as shown on Policies Map 15.2), unless such provision would make the development of the site unviable or there is a proven lack of need for the uses in Part A of the policy:**
- i. Former Police Station site, Blyth Road**
  - ii. Former Fire Station site, Station Road**
  - iii. Station Road Courtyard, Blyth Road**
- C. The design concepts for the sites specified in B i- iii, and any other site in the Front of Town Area shown on the Policies Map 15.4, should be informed by the Ingleton Wood Design Framework set out in Section 14.**
- D. Development proposals in the Front of Town Area should include an assessment of the direct and cumulative impacts of the proposed scheme on pedestrian and cycle movements and traffic congestion, and identify and address any necessary mitigation works.**

## 11 NON-POLICY ACTIONS

11.1 These Non-Policy Actions are matters of importance, as raised by the community, that do not require a Policy in order to progress. Also, they are actions that will assist the dedicated Policies in achieving the stated objectives of the Plan.

11.2 It should be recognised that a Neighbourhood Plan cannot deliver the entirety of a community's vision, either individually or collectively. Much of such matters are beyond the scope of Planning Policy or require remedial action to deal with existing, perceived, shortcomings. For this to happen, both individuals and groups within the community, together with the Town Council, must continue the work of building and maintaining a strong community. And, in working with developers, landowners, businesses, community groups and other agencies, provide facilities best targeted to meet community needs.

In addition, the closeness of excellent working relationships with both District and County Councils, cannot be overstated.

11.3 The areas in which matters worthy of further work have emerged during the course of consultations are noted here, but they are by no means exhaustive. However, ownership of the matters listed have been suggested, but inclusion is not meant to signify approval, or the prioritisation of any listing.

CONCERN	POSSIBLE ACTIONS	LEAD AGENCIES & PARTNER
Diversify the local economy by establishing spaces for knowledge and creative based businesses	<ul style="list-style-type: none"> <li>Investigate potential opportunities for new sites</li> <li>Investigate the further use of assets within the Town</li> </ul>	Southwold Town Council Other property/land owners Funding Agencies
Reverse decline in resident population. Seek to achieve a more balanced age-range within the resident population	<ul style="list-style-type: none"> <li>Appoint a Town Manager to establish initiatives for out of peak season events and activities</li> <li>Undertake a promotional programme to attract people to live and work in Southwold</li> <li>Improve transport links and take opportunities to work with other agencies to improve transport links</li> </ul>	Southwold Town Council East Suffolk Council Suffolk County Council Transport Providers
Retain and enhance the natural and built environment	<ul style="list-style-type: none"> <li>Maintain and promote historic assets</li> <li>Use the expertise of the Suffolk Design Review Panel</li> <li>Incorporate Southwold Town Council 'Entrance to Town' concept designs within potential developments</li> <li>Improve measures to protect and maintain the natural environment</li> </ul>	Southwold Town Council Common Trust East Suffolk Council Suffolk Coast & Heaths AONB officers

	<p>including the Common, the Denes, marshes and footpaths</p> <ul style="list-style-type: none"> <li>• Work with the District Council to ensure that Section 106 agreements are robust and properly enforced</li> <li>• Work with the District Council to ensure that conditions attached to planning consents are strictly enforced</li> <li>• Work with the District Council on design principles</li> </ul>	Environment Agency
Protect, maintain and enhance Southwold's community assets	<ul style="list-style-type: none"> <li>• Continue liaising with relevant groups with the aim of enhancing community assets</li> <li>• Continue liaising with SouthGen whose aim is to provide a new community hub at the former Hospital site to include the library</li> <li>• Continue working with partners and stakeholders to protect and preserve the well-being of the harbour and estuary and improve its governance</li> <li>• Work with the District Council and other partners to ensure sustainable public toilet facilities within the town</li> </ul>	Southwold Town Council East Suffolk Council SouthGen Suffolk County Council Other Stakeholders
Improve the flow of traffic	<ul style="list-style-type: none"> <li>• Improve informative and directional signage for visitors, including availability of spaces at public car parks</li> </ul>	Southwold Town Council Suffolk County Council
Improve parking	<ul style="list-style-type: none"> <li>• Finalise and implement the findings of the on-going Southwold Parking Review</li> <li>• Improve the availability of off-road parking for residents, employees and visitors within the constraints of land ownership and availability</li> <li>• Work with the Suffolk Police Authority and the District Council to ensure appropriate traffic regulation enforcement is in place</li> <li>• Work with other responsible agencies/ stakeholders to optimise the availability and allocation of parking spaces for resident and non-resident use in local authority owned car parks</li> <li>• Work with the Millennium Foundation regarding use of its car park for use by residents, employees and visitors</li> <li>• Continue to liaise with landowners/ partners to investigate feasibility/establishment of a Park and Ride scheme</li> </ul>	Southwold Town Council Common Trust Millennium Foundation East Suffolk Council Landowners Transport Providers Suffolk Police Authority

## 12. GLOSSARY

- **Affordable housing** – as defined in Annex 2 of the NPPF (2019): Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). This includes affordable housing for rent; starter homes; discounted market sales housing; and other affordable routes to homeownership including share ownership, relevant equity loans, other low cost homes for sale (at a price equivalent of at least 20% below local market value and rent to buy).
- **Built form** - this refers to the man-made landscape and the various aspects of physical development within it.
- **Community Infrastructure Levy (CIL)** - Some new development is potentially liable for the levy, which funds the building of infrastructure. In the former Waveney District, it is currently chargeable on residential (excluding affordable housing), supermarkets and holiday lets. An East Suffolk CIL review is due to take place.
- **Local Plan** - the planning policy document prepared by the former Waveney District Council, covering Southwold parish. This addresses strategic planning matters and the Southwold Neighbourhood Plan, as required by the National Planning Policy Framework, must be in general conformity with the Local Plan. The local planning authority is now East Suffolk Council.
- **Intermediate tenure housing** - Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.
- **Micro-business** - a company employing fewer than ten people.
- **National Planning Policy Framework (NPPF)** - the national planning policy document which sets out the Government's planning policies for England and how these are expected to be applied.
- **Small and medium-sized enterprises (SMEs)** - enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding 50 million euro, and/or an annual balance sheet total not exceeding 43 million euro.

## 13. CHARACTER AREA APPRAISAL

13.1 The Southwold Character Area Appraisal and the Assessment of Gardens appendix can be found at <https://southwoldtown.com/planning-committee/>

### Southwold Character Area Appraisal

Client:  
Southwold Town Council

Date:  
October 2018

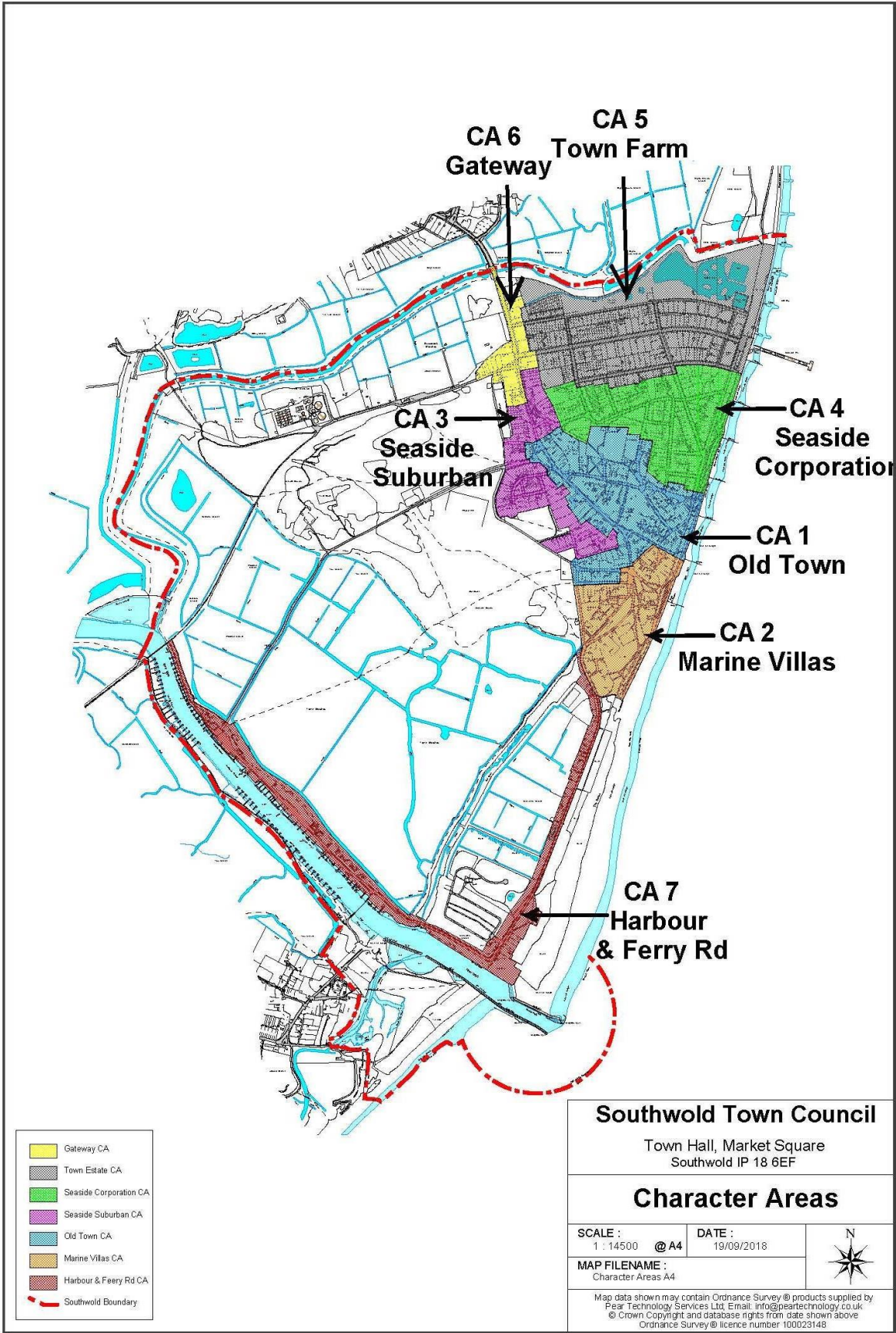


### Appendix to Southwold Character Area Appraisal Assessment of Gardens in Southwold

Client  
Southwold Town Council

Date:  
April 2020





**Southwold Town Council**  
 Town Hall, Market Square  
 Southwold IP 18 6EF

**Character Areas**

SCALE : 1 : 14500 @ A4 DATE : 19/09/2018

MAP FILENAME : Character Areas A4



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# 14. INGLETON WOOD DESIGN FRAMEWORK

## SOUTHWOLD TOWN ENTRANCE STUDY



Southwold Town Council has instructed Ingleton Wood LLP to explore options for the potential redevelopment of the entrance to the Town.

Why? The sites in question together occupy an important location; being the first thing people see when they enter the town. Accordingly, the Town Council is keen to build on the planning policies within Waveney District Council's Adopted Development Plan, to provide a locally specific guide to influence future developments within the area and promote high quality design in this sensitive location.

It is also intended that the initial work undertaken on behalf of the Town Council will be used to inform the preparation of the Neighbourhood Plan, which is currently being progressed.

The exercise is intended to provide an opportunity for the local community to pass comment and potentially shape the future redevelopment of these key sites.



1



2



3



4



5



6





### **Study Area Overview**

The scheme overview indicates how, in the fullness of time, the individual sites in the study area could be developed to provide a joined up street pattern and, crucially, an appropriate entrance into Southwold. The illustrative plans suggest how in the future different uses may sensibly be located within the area, with an indication of appropriate building scale, roof forms and access arrangements.

In terms of how we think new uses may be accommodated within the study area, we expect that behind Hurren Terrace and at key corners around the Blyth Road/Pier Avenue junction, small-scale local commercial or retail uses are appropriate at ground level, with taller residential buildings (up to 3 storey) possible around the Pier Avenue/Mights Road roundabout.

Elsewhere, future development should be for housing at a suitable scale to make an appropriate transition into the town. This is likely to include a mix of town houses and apartments.

The design of individual buildings will be subject to planning considerations at the time of submission, but building architecture and material palettes should exhibit a strong relevance to the local context. A mixture of traditional and contemporary styles may be appropriate, subject to a high quality finish and locally appropriate building proportions.

### **Block 1 - 'Station Yard'**

The study for this site suggests how the block could be redeveloped in time with appropriate infill development at the rear of Hurren Terrace and along the Blyth Road frontage. Any future development should look to protect the existing Victorian frontage and seek to improve the quality of the pedestrian connection through the yard area. The site at the rear of the block is an appropriate location for small scale local businesses, as is the block on the corner of Blyth Road which could also house upper level residential or commercial accommodation.

Parking is restricted on this site and off-site solutions would need consideration.

### **Block 2&3 - 'The Mews'**

These blocks could work independently as attractive residential addresses, but should be considered together to ensure that a high quality consistent street frontage is provided and the existing roundabout junction is not compromised. New development should consider on-site parking to the rear of the blocks, probably doubling up as a shared surface mews with attractive landscape design.

The frontages to these sites are extremely important in setting the visual scene at the entrance to Southwold and therefore the scale and quality of the architectural design, building form, and roof profiles are crucial in protecting and enhancing existing views into the town. Generally the building heights should be 2 storey, stepping up to 2.5 storey in appropriate locations.

### **Block 4 & 5 - 'The Approach'**

These blocks could work independently as attractive residential addresses, but should be considered together to ensure that a high quality consistent street frontage is provided and the existing roundabout junction is not compromised. The depth of the plots suggests a terraced arrangement is a suitable layout strategy, with on-site parking located to the rear and accessed off North Road and Pier Avenue.

Typically the scale should be 2 storey to reflect the scale of neighbouring properties adjoining the sites. although subject to high quality design a taller block could be acceptable

## Study Area Overview



The sites identified for the study area are highlighted on the plan opposite. Whilst the sites are currently within a variety of ownerships, they are considered collectively in this report for their significance in terms of impact on the setting of the entrance to Southwold Town Centre.

- Town Houses
- Apartments
- Retail / Commercial



Indicative Proposed Massing

## Block 1 - 'Station Yard'



Commercial Courtyard - site area 1805 sq.m

- Retail / Commercial
- Upper level residential or commercial use

- 1A 1 no. 140 sq.m units  
2 no. 72 sq.m units
- 1B 4 no. 2 storey 132 sq.m units  
1 no. 48 sq.m units  
7 no. car parking spaces

- Create high quality 'pocket square'
- Reinforce pedestrian connectivity through the block
- Creation of a destination live/work address
- Small commercial units open onto a communal space.....or retention of light industrial use?
- Mix of residential & commercial front doors
- Flexible use of courtyard space for sculpture, exhibition, display purposes
- Traditional materials - red pantiles, brickwork, timber windows
- Muted palette of colours -mix of natural and painted brick, timber panels and coloured render
- Shared courtyard -pedestrian and vehicles use a block paved landscaped space
- Use of low shrubs and trees to soften 'hard' block paved courtyard



## Block 1 - 'Station Yard'



Possible illustrative View - Looking West from Hurren Terrace

### Formal Precedents



### Material References



## Block 2 & 3 - 'The Mews'



Residential Courtyard - site area 2909 sq.m

■ Town Houses

■ Apartments

8 no. 3 bed townhouses

1 no. 4 bed townhouses

17 no. 2 bed apartments

2 no. 2 bed Mews house

28 no. car parking spaces

- Continue pedestrian route through interior of block
- Shared courtyard – pedestrian and vehicles use a block paved landscaped space
- Mix of traditional forms and contemporary architectural detailing
- Scale transitions from 2 storey to 3 storey at corner locations
- Use of low shrubs and trees to soften 'hard' block paved courtyard
- Traditional materials – red pantiles, brickwork, timber windows
- Muted palette of colours – mix of natural and painted brick, timber panels and coloured render
- Each block can standalone to show a phased development
- Fenestration + elevation rhythm appropriate to Southwold



## Block 2 & 3 - 'The Mews'



Possible illustrative View - Looking North from Blyth Road

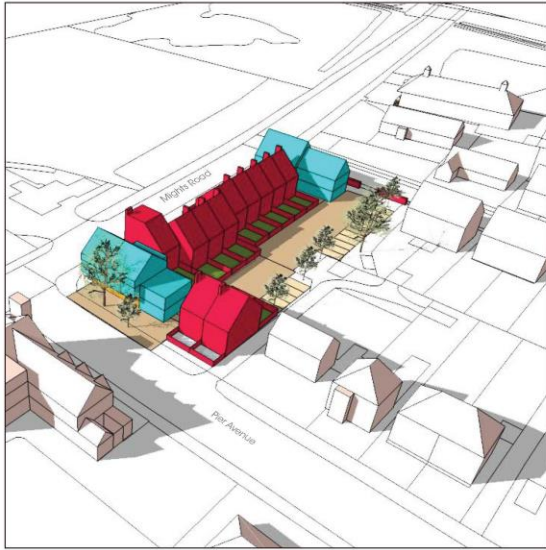
### Formal Precedents



### Material References



## Block 4 & 5 - 'The Approach'



Residential Courtyard - site area 2563 sq.m

<span style="display: inline-block; width: 15px; height: 15px; background-color: red; margin-right: 5px;"></span> Town Houses	10 no. 3 bed townhouses
<span style="display: inline-block; width: 15px; height: 15px; background-color: cyan; margin-right: 5px;"></span> Apartments	1 no. 4 bed townhouses 9 no. 2 bed apartments
<span style="display: inline-block; width: 15px; height: 15px; background-color: orange; margin-right: 5px;"></span> Retail / Commercial	1 no. 3 bed apartments 1 no. Retail unit 80 sq.m

- 2 storey terraced housing framing approach transitions height up to 2.5 storey corner locations
- Commercial usage possible on ground floor location of corner unit
- Create a south facing square in front of retail unit
- Density is increased at corner locations
- Mix of traditional forms and contemporary architectural detailing
- Traditional materials – red & smut roof tiles, brickwork, timber windows
- Muted palette of colours – mix of natural and painted brick, timber panels and coloured render
- Each block can stand alone to allow a phased approach



## Block 4 & 5 - 'The Approach'



Illustrative View - Looking South from Might's Road

### Formal Precedents

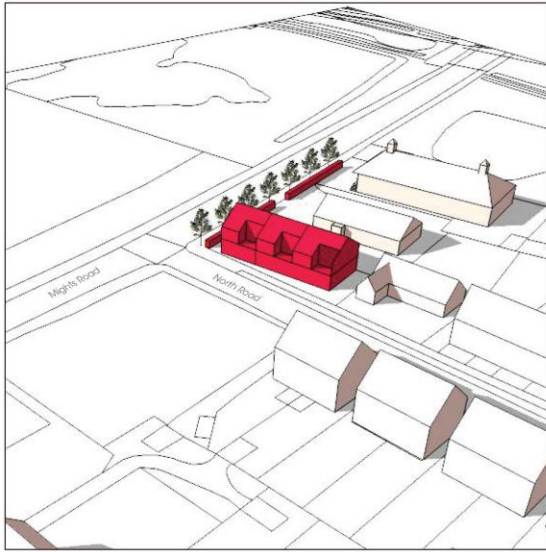


### Material References





## Block 6 - 'The Stables'



Residential Courtyard - site area 1505 sq.m



Town Houses

3 no. 2 bed apartment or townhouses

6 no. car parking spaces

- Low impact mews cottages / coach house
- Possible flats above garages
- Mix of traditional and contemporary architectural detailing
- Scale transition to block 5



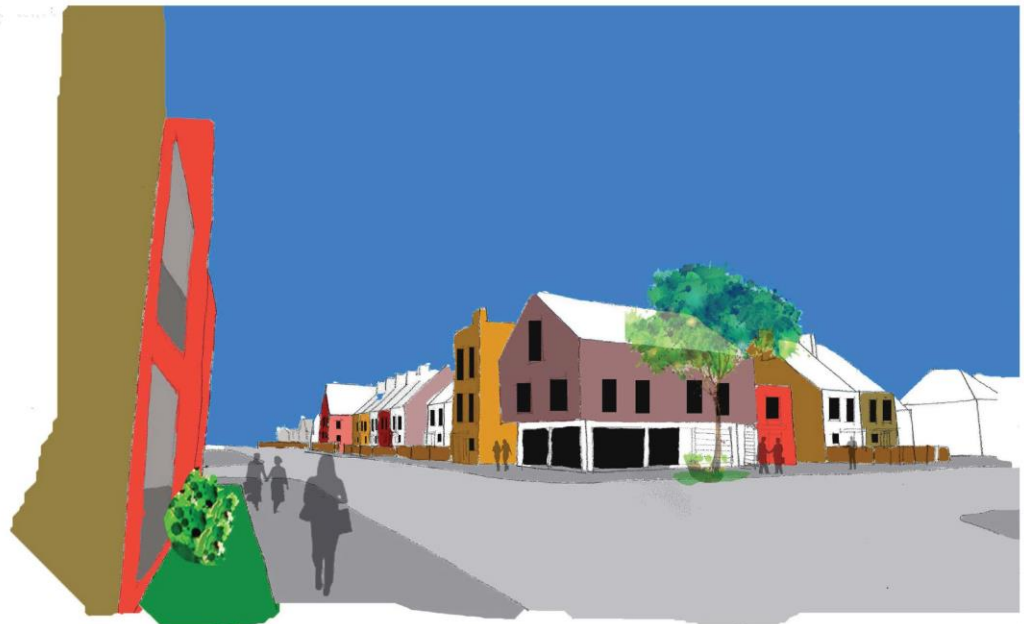
## 'The Hub'



Residential Courtyard - site area 7277 sq.m



- Key node for town centre gateway
- Concentration of scale + active uses
- Density is increased at corner locations
- Commercial usage possible on ground floor location of corner units
- Terraced housing transitions height to 2.5 storey corner buildings
- Apartments terminate view from Pier Avenue
- Mix of traditional forms and contemporary architectural detailing
- Traditional materials – red & smut roof tiles, brickwork, timber windows
- Muted palette of colours – mix of natural and painted brick, timber panels and coloured render



## 'The Hub'



Possible illustrative View - Looking West from Pier Avenue

### Formal Precedents



### Material References



## 'The Hub'



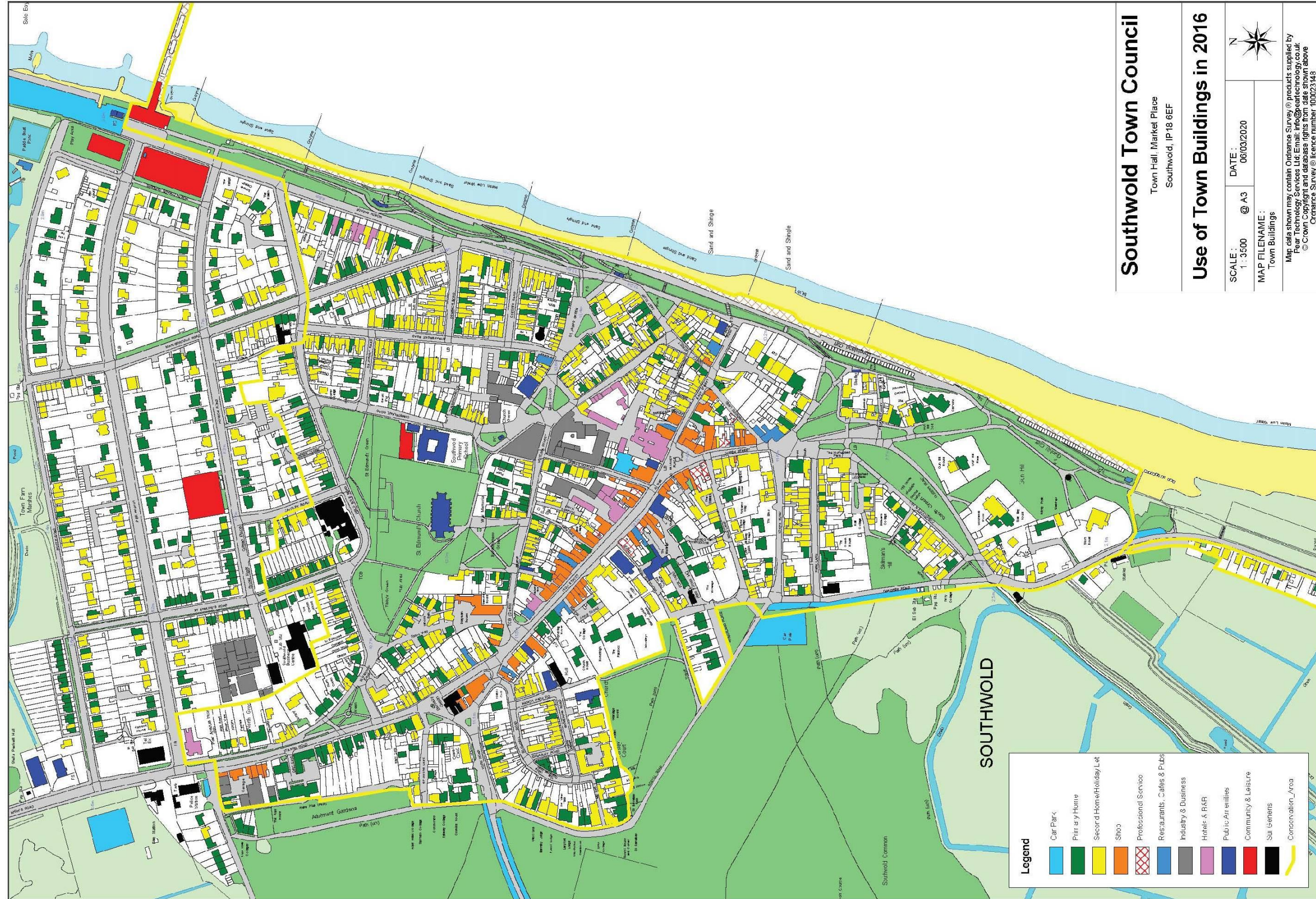
View North along Might's Road



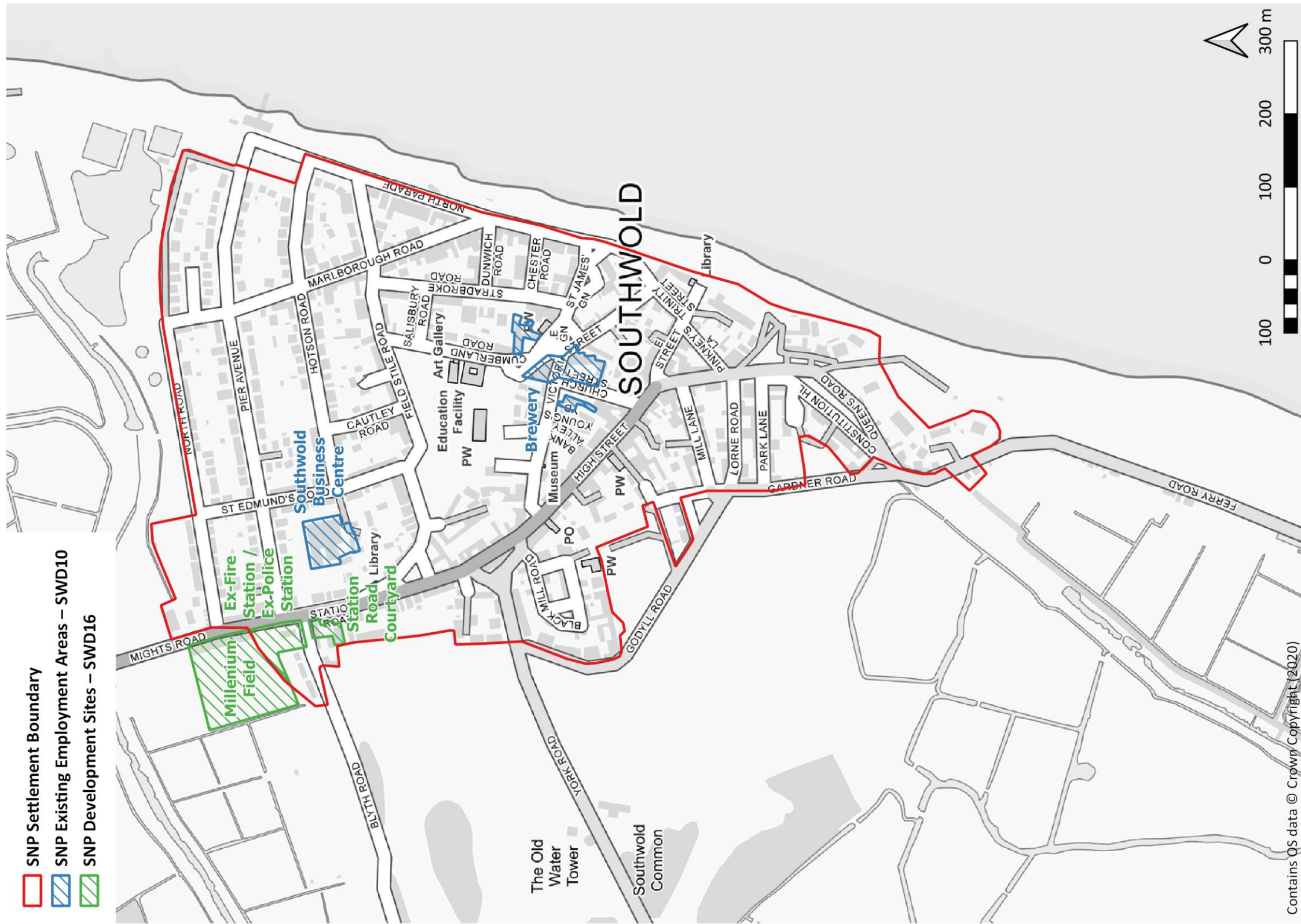
View West along Pier Avenue

# 15. MAPS

## 15.1 Building and Uses

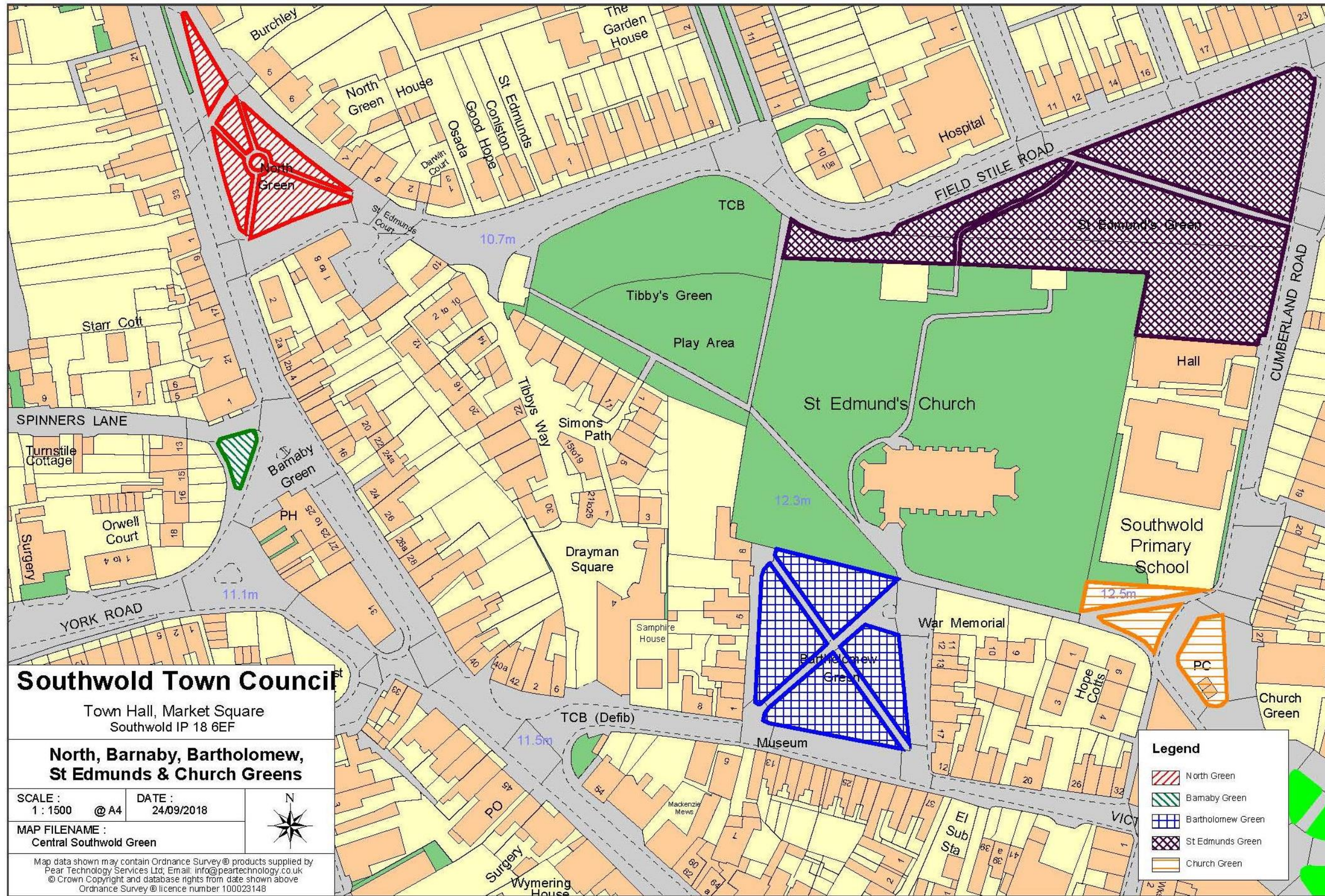


15.2 Policy Areas (SWD 10 and SWD 16)

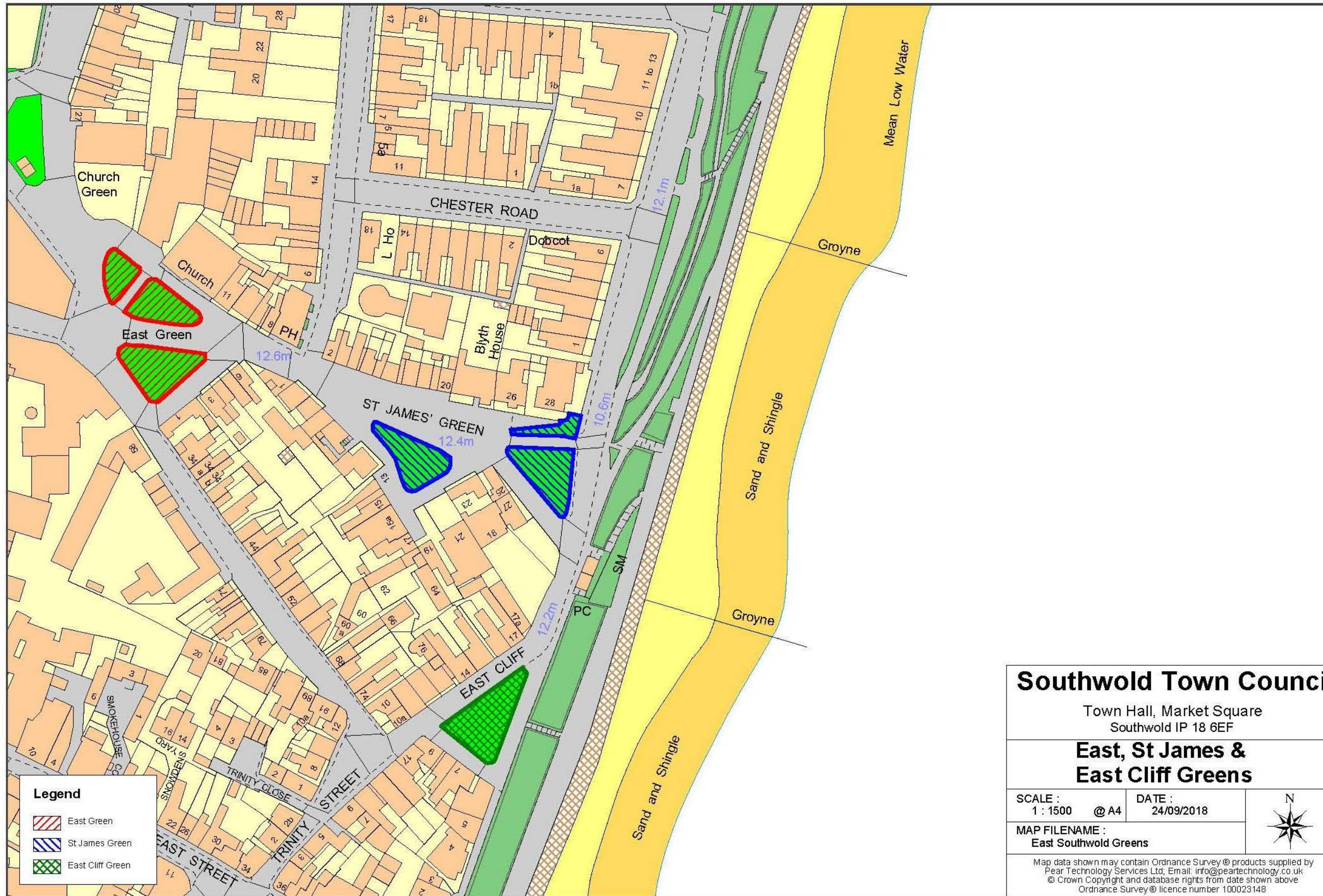


Blue areas: New employment zones (Policy SWD10) Green areas: Development areas (Policy SWD16) Red line: Physical development limit of Southwold (Policy SWD16)

### 15.3 Central Southwold Greens (SWD 13)

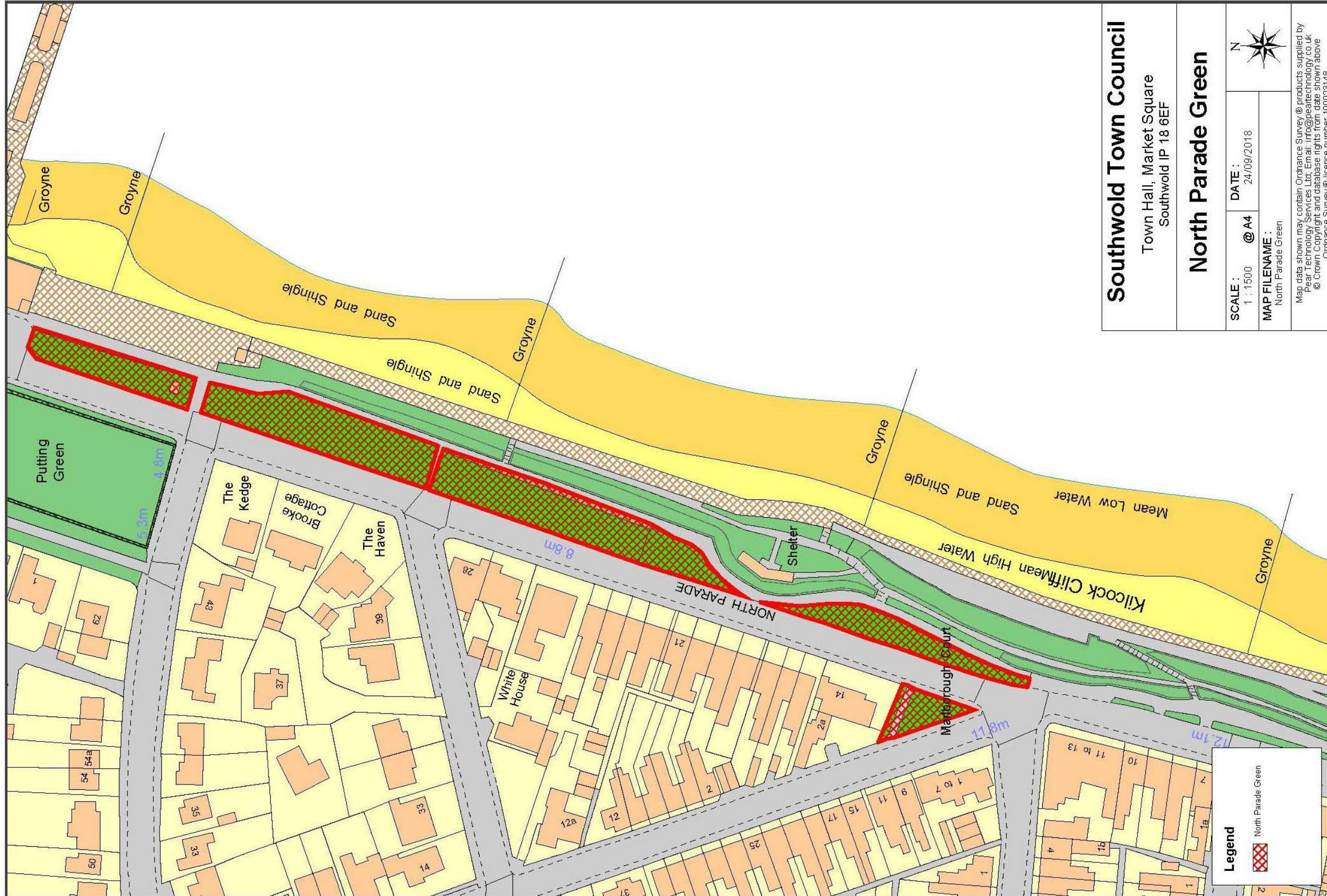


15.4 East Southwold Greens (SWD 13)





15.5 North Southwold Greens (SWD 13)



15.6 South and Gun Hill Greens (SWD 13)

