

Worlingham Neighbourhood Plan 2021 - 2036

Submission Version (Regulation 16)
Publication Draft

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1. INTRODUCTION

- 1.1 This document represents the Neighbourhood Plan for Worlingham Parish. It is one part of the development plan for the parish over the period 2021 to 2036, the other parts being the recently adopted local plan for the former Waveney area¹ and the local plan for the Broads². National planning policy will also apply.
- 1.2 The former Waveney District Council (superseded organisationally by East Suffolk Council on 1 April 2019) and The Broads Authority designated a Neighbourhood Area for the whole of the parish area in March 2017 to enable Worlingham Parish Council to prepare the Neighbourhood Plan. The plan has been prepared by the community through the Worlingham Neighbourhood Plan (WNP) Team.
- 1.3 The map overleaf shows the boundary of the Neighbourhood Plan area, which is contiguous with the boundary of Worlingham Parish. The north of the parish also falls within the Broads area. The Broads Authority, as the local planning authority for the Broads, has its own local plan.
- 1.4 The WNP has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2012 (as amended). The WNP Group has prepared the plan to establish a vision for the future of the parish and to set out how that vision will be realised through planning and managing land use and development change over the plan period 2021 to 2036.
- 1.5 The purpose of the Neighbourhood Plan is to guide development within the parish and provide guidance to any interested parties wishing to submit planning applications for development within the parish. The process of producing a plan has sought to involve the community as widely as possible and the topic areas are reflective of matters that are of considerable importance to the residents of Worlingham.
- 1.6 Each section of the plan covers a different topic. Under each heading there is the justification for the policies presented, which provides the necessary understanding of the policy and what it is seeking to achieve. The policies themselves are presented in the blue boxes. It is these policies against which planning applications will be assessed. It is advisable that, in order to understand the full context for any individual policy, it is read in conjunction with the supporting text.

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¹ Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk)

² Local-Plan-for-the-Broads.pdf (broads-authority.gov.uk)

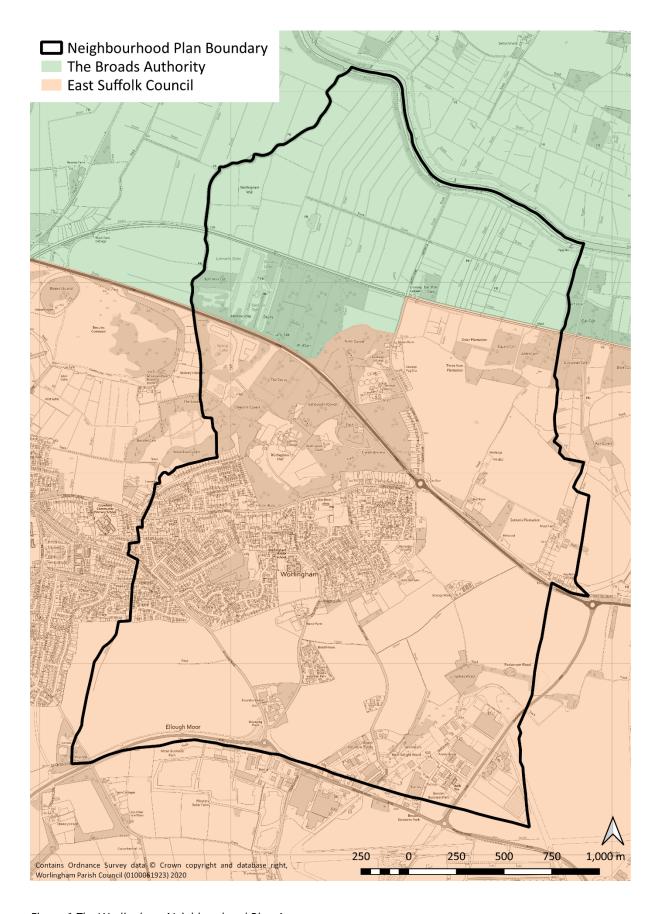


Figure 1 The Worlingham Neighbourhood Plan Area

National policy

1.7 The National Planning Policy Framework³ (NPPF) states:

"Neighbourhood plans must be in general conformity with the strategic policies in any development plan that covers their area." Those development plans are the East Suffolk (Waveney) Local Plan and the Local Plan for the Broads.

Developing the Neighbourhood Plan

- 1.8 Worlingham Parish Council began deliberations surrounding neighbourhood planning in 2014. Its neighbourhood plan team (WNP Team) reached out to the community to gauge support. The team subsequently broadened with both resident and parish council members in January 2016.
- 1.9 The enlarged WNP Team identified a number of key issues and set up a work-group structure to probe each of these. Progress was monitored through minuted monthly meetings. The wider community was consulted again at the village fete in September 2016.
- 1.10 A detailed questionnaire⁴ was subsequently distributed to every household in the parish in November 2016. The responses to the questionnaire have contributed substantially to the drafting of the policies and actions in this Neighbourhood Plan.
- 1.11 A Drop-in Day for the community was held in the sports hall of the local primary school on Wednesday 26 May 2017. Displays covered the responses from the Neighbourhood Plan questionnaire, the recommendations from the Housing Needs Assessment⁵, the "Vision" and the "Objectives" for the Neighbourhood Plan, nomination of "Local Green Spaces", and preliminary issues surrounding potential development sites. Residents had the opportunity to comment upon the "Vision" and the "Objectives" and the proposals for the nomination of "Local Green Spaces".
- 1.12 The matter of neighbourhood planning has been a routine agenda item for the monthly public meetings of the Worlingham Parish Council.

³ National Planning Policy Framework (publishing.service.gov.uk)

⁴ See Appendix 1 of Worlingham Neighbourhood Plan Consultation Statement (December 2021)

⁵ Housing Needs Assessment. A study towards the evidence base for Worlingham Neighbourhood Plan. February 2017.

2. LOCAL CONTEXT History of Worlingham

- 2.1 Worlingham has a long history. It was mentioned in the Domesday Book of 1086. The meaning of Worlingham is "Village of Werel" or "Werwulf's people" (Suffolk Parish Pack, Suffolk Records Office).
- 2.2 Worlingham grew out of the two manors of Great and Little Worlingham, each having its own parish church ("A Brief History of Worlingham circa 1281 1837" by Councillor Stephen Shepherd).
- 2.3 In 1086, the population was some 81 persons. By 1603, this had fallen to 67 adults. In 1674, 31 households were recorded. Occupations recorded for the period 1500 to 1549 include 2 yeomen and 1 "rough" mason (Suffolk Parish Pack, Suffolk Records Office).
- In 1818, there was a small day school with 10 pupils. There was a Sunday school with 31 attendees. The National School was built in 1845 and then enlarged in 1910. Average attendance in 1912 was 65. ("Suffolk Parish Pack", Suffolk Records Office). This school was demolished to make way for the bypass.



Figure 2 Worlingham Primary School



Figure 3 View of the Lowestoft Road

2.5 The parish has a number of significant heritage assets including the Grade 1 listed Worlingham Hall, Church of All Saints (Grade II*), Worlingham Manor (Grade II) and the Serpentine Wall (Grade II), which is shown below. The locations of these assets are indicated in the Worlingham Parish Development Context Map in Section 4. (See also Section 8 for photographs of the Lowestoft Road in the vicinity of Worlingham Hall and Church of All Saints.)



Figure 4 The Grade II listed serpentine wall.

2.6 Further information concerning historical Worlingham came from the excavations prior to the development of the most recent ("Werel's Loke") estate within the eastern part of the settlement boundary, which have led to the following

related archaeological records (ref. Archaeology Data Service): Beaker pits and medieval farmstead activity (Site/SMR codes: WGM007, WGM008); medieval features spanning the 11th to 14th centuries, as well as possible prehistoric burnt features (Site/SMR code: WGM008); two medieval sites fronting of similar 12th-14th century date (Site/SMR code: WGM006); and Bronze Age and medieval and Saxon finds (Site/SMR code: WGM007).

Modern Worlingham and its spatial context

- 2.7 Worlingham is in the northern part of the Waveney area, which since 1 April 2019 is now covered by East Suffolk Council. Waveney, situated in north-east Suffolk, is the most easterly area in Britain and is still a distinct parliamentary constituency.
- 2.8 The former Waveney area has four market towns (Beccles (with Worlingham), Bungay, Halesworth and Southwold (with Reydon)), which have a combined population of 28,310 (or 24.6% of the area's total).
- 2.9 Barnby/North Cove, to the east of Worlingham, lies in the same ward as Worlingham Parish.
- 2.10 Worlingham, itself, has a population of approximately 3,745 (2011 Census). It is bounded to the north by the River Waveney. The adjacent low-lying zone, which is mostly farmland, lies within the Broads Authority within Waveney. Only one dwelling, it is understood, at the northern end of Marsh Lane, lies within this Broads area.
- 2.11 The centre of Beccles is situated a mile to the west; the centre of Lowestoft is situated eight miles to the east, and Norwich is nearly twenty miles to the northwest.
- 2.12 The majority of the built mass of Worlingham is located to the south of the Lowestoft Road that runs from Beccles and towards Lowestoft.
- 2.13 To the north of the Lowestoft Road, west of Worlingham, land within Beccles serves as (and has long been regarded by the communities as) an open space between the town and the village, even though a few properties in Beccles along the north side of the Lowestoft Road and into Park Drive undermines this separation.
- 2.14 Housing along the south side, and farther south, of the Lowestoft Road, apart from the presence of school sports grounds, has become essentially contiguous in nature as the respective communities have grown. However, the housing in Beccles extends farther south relative to the housing in Worlingham. To the immediate south of these residential areas is greenfield land, which is mostly farmland. The spread and topography of that part of the greenfield land lying in southwest Worlingham confers in the vicinity a residual sense of separation between the two communities.
- 2.15 The Ellough industrial estate is located within and around the parish boundary to the south. There are expectations this estate will develop significantly, providing increased employment opportunities. A new bypass (the Southern Relief Road) was completed in 2018. This road was built to remove traffic (particularly heavy goods vehicle traffic) from the roads of Beccles and Worlingham and to provide more direct access to the industrial area.
- 2.16 Facilities in Worlingham comprise a "One Stop" general store (including Post Office), a hairdressing and beauty salon, a fish and chip shop, a newsagent, a pharmacy and a church.
- 2.17 Worlingham now has only one school, which was formed recently when the former

- primary school closed and its activities merged with that of the former middle school on the latter's premises, following Suffolk County Council's decision to move from a three-tier to a two-tier system of schooling. In addition, Worlingham has a thriving pre-school group.
- 2.18 Bus services between Lowestoft and Norwich and between Southwold and Norwich stop in the village. There is also a local service connecting Worlingham and Beccles. (See paragraph 2.52 for details of these bus services.)
- 2.19 There is no doctor or dentist located in the Parish. Police cover is provided by the Beccles and Bungay Safer Neighbourhood Team.
- 2.20 The only community meeting place in the village was the Church Hall, which was closed on health and safety grounds in September 2008. However, plans, strongly supported by Suffolk County Council, for a new community centre are well-advanced, taking advantage of the site vacated by the former primary school.
- 2.21 There are seven play areas distributed across the village. It is generally considered that Worlingham is well served for play provision.
- 2.22 Home ownership (with and without a mortgage) is high by both area (former Waveney area) and national standards.
- 2.23 The population of Worlingham parish, just as that of the former Waveney area, has a higher proportion of elderly residents than is the case for the population of England. Despite this situation, there is very limited supported-living accommodation in Worlingham for older residents, and there is no retirement home and/or retirement village-style provision.
- 2.24 The ethnic mix in Worlingham is predominantly White British, with a small number of other white people and much smaller numbers of people having mixed ethnicity, Caribbean, African, Chinese and other Asian origins (2011 Census: KS201EW).

Profile of the community today

2.25 Unless stated otherwise, the profile of the community has come from the 2011 Census for Worlingham Parish (i.e. as opposed to Worlingham Ward). Similarly, demographic changes between 2001 and 2011 are all based upon census data at parish level.

Population

- 2.26 Between 2001 and 2011, the population of Worlingham Parish increased by 13.6% (rising to 3,745 residents in 2011) due to the development of new estates on the outskirts of the village. During this period, the population of the former Waveney area increased by 2.6%, the population of the East of England region increased by 8.5%, and the population of England increased by 7.9%.
- 2.27 192 dwellings were added to Worlingham Parish between 2001 and 2011, representing an increase of 13.5%. During the same period, there was about a 5.8% increase in the number of dwellings in the former Waveney area.
- 2.28 The age structure of Worlingham in 2011, following the period of rapid housing growth, closely approximates that of the former Waveney area. (In 2001, Worlingham Parish had been slightly "younger" than the former Waveney area.) Both have an older population relative to England. This will inform the housing characteristics required for

future development of the village and for the former Waveney area generally.

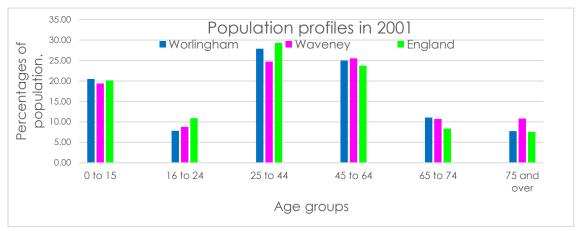


Figure 5 Population age profile derived from 2001 Census data

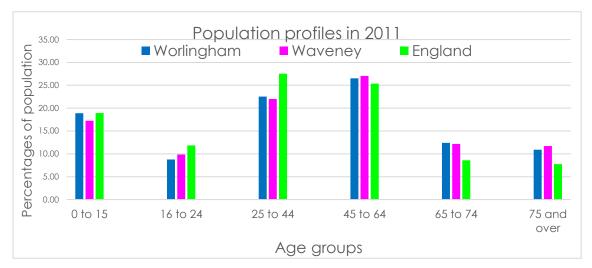


Figure 6 Population age profile derived from 2011 Census data.

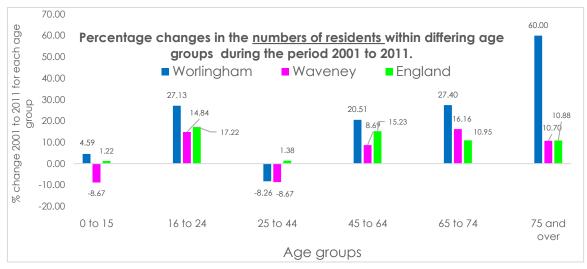


Figure 7 Age profile changes between 2001 and 2011

2.29 The highest levels of growth in the population of Worlingham are identified with the "65-74" and the "75 and over" age groups (see Figure 7).

2.30 The decline in the numbers of residents aged "25-44" between 2001 and 2011, both in Worlingham Parish and in the former Waveney area as a whole, is a worrying trend as this is the group representing young families.

Work

- 2.31 69.4% of the working-age population of Worlingham Parish is economically active, which is higher than the figure for the former Waveney area (at 65.3%), lower than the figure for the East of England region (at 71.6%) and comparable to the figure for England (at 69.9%). Of those people who are working, the proportion in full-time employment exceeds that for the former Waveney area, but is slightly smaller than at the national level (see Figure 8).
- 2.32 Economic inactivity identified with retirement is 21.1% for Worlingham; 20.3% for the former Waveney area; 14.4% for the East of England; and 13.7% for England.

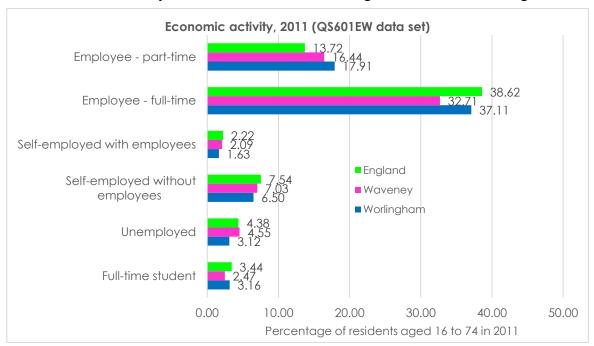


Figure 8 Economic activity categories (derived from 2011 Census date).

2.33 The population of Worlingham is relatively healthy, and this in part may account for its higher level of economic activity relative to that of the former Waveney area (see Figure 9).

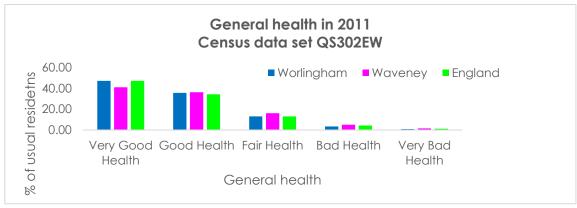


Figure 9 Health profile for residents derived from 2011 Census data.

2.34 The sectoral profile of the workforce in Worlingham has a higher connection to the manufacturing sector than is the case for the workforces at the former Waveney area level and national level (see Figure 10). This is a possibly worrying feature in view of the decline of this sector. Examination of the types of manufacturing jobs reveals that a third of those engaged in this sector (in Worlingham Parish) work in "Chemicals, chemical products, rubber and plastic", almost certainly being linked to plastic packaging (given the two large packaging companies in this part of the former Waveney area). The other most prominent manufacturing sector represented (accounting for nearly 10% of the manufacturing workers in Worlingham) is the "Food, Beverages and Tobacco sector". Here, the Food industry is the part most likely to be relevant.

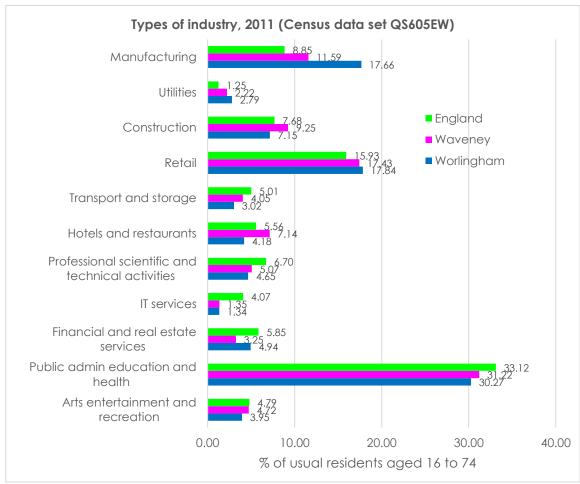


Figure 10 Breakdown of employment sectors derived from 2011 Census data.

- 2.35 Another strong difference in employment is the lower involvement in "Accommodation and Food Service Activities", indicating less dependence on tourism in Worlingham as compared with the former Waveney area.
- 2.36 The other employment sectors are broadly represented to levels comparable to those for the former Waveney area
- 2.37 Worlingham Parish residents have more pronounced representation, relative to the former Waveney area, in the professional job categories that usually pay higher salaries (see Figure 11).

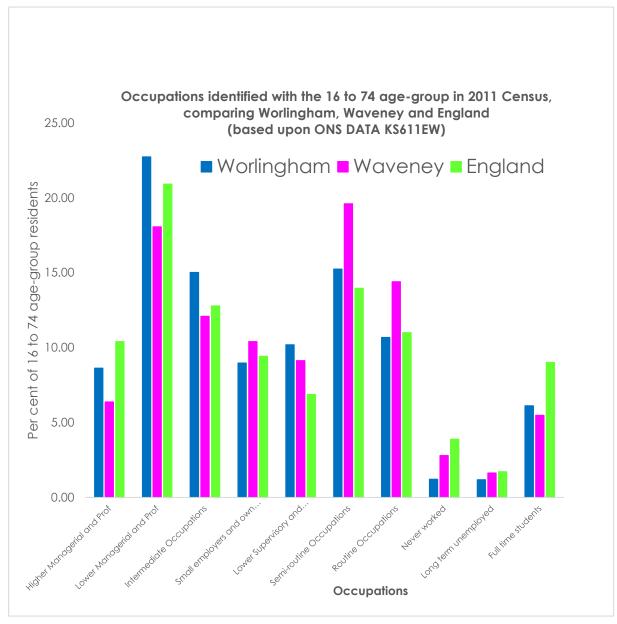


Figure 11 Occupation profiles of residents derived from 2011 Census data.

- 2.38 The proportion of people educated to Level 4 or higher exceeds that for the former Waveney area, but is smaller than that at the national level (see Figure 12). The educational categories represented are:
 - "No qualifications": No academic or professional qualifications.
 - "1 to 4 GCSEs or equivalent": Level 1 qualifications.
 - "5+ GCSEs or equivalent": Level 2 qualifications.
 - "Apprenticeship": Apprenticeship.
 - "2+ A-levels or equivalent": Level 3 qualifications.
 - "Degree level or above": Level 4 qualifications and above.
 - "Other qualifications": Vocational/Work-related qualifications, foreign qualifications/ qualifications gained outside the UK (NI) (Not stated/level unknown).



Figure 12 Profile of residents' qualifications derived from 2011 Census data.

2.39 The large majority of those in work travel to work by car and do so as the driver of the car (see Figure 14). A smaller percentage walk to work than is the case at the former Waveney area level, reflecting the greater distances to places of work. Although the average distance travelled to work from Worlingham would appear to be comparable to that for the former Waveney area as a whole (around 16 km), the pattern of miles travelled seems to be different (see Figure 13). In 2011, 40.5% of Waveney residents' journeys to work were less than 5 km (3.1 miles). Only about 30% of the journeys to work from Worlingham were less than 5 km. (Note: This commuting-distance data for Worlingham is based on ONS "output areas" that capture about 80% of the village's residents.)

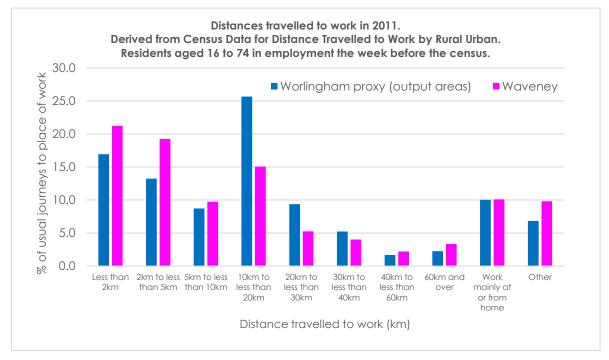


Figure 13 Profile of distances travelled to work derived from 2011 Census data.

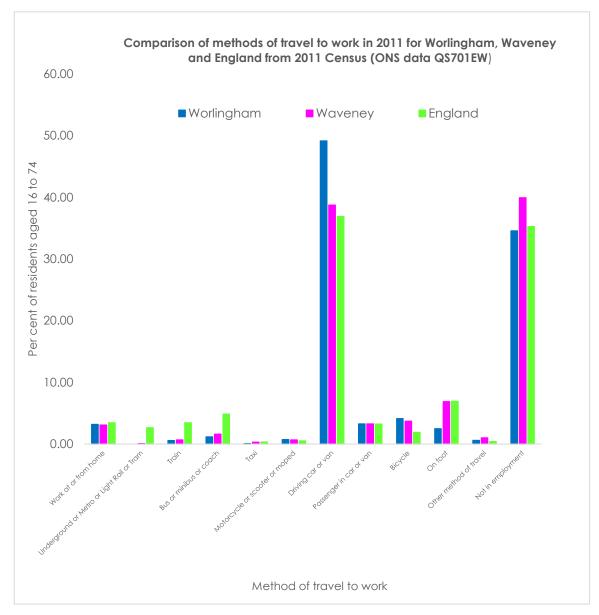


Figure 14 Profile of commuting methods derived from 2011 Census data.

2.40 The above is supported by Census figures on access to a car within households. On average, each Worlingham household has access to 1.5 cars. This is significantly higher than for the former Waveney area (1.2 cars per household), the East of England region (1.3 cars per household) and for England (1.2 cars per household).

Housing

- 2.41 Worlingham, even more than the former Waveney area, is dominated by detached houses and bungalows (see Figure 15). Two-thirds of the dwellings are detached. There are few flats or maisonettes.
- 2.42 This is reinforced by the analysis of the numbers of bedrooms that properties in Worlingham have. Worlingham has a higher percentage of 4-bedroom properties than does the former Waveney area or England (see Figure 16). On the other hand, it has extremely few 1-bedroom properties.

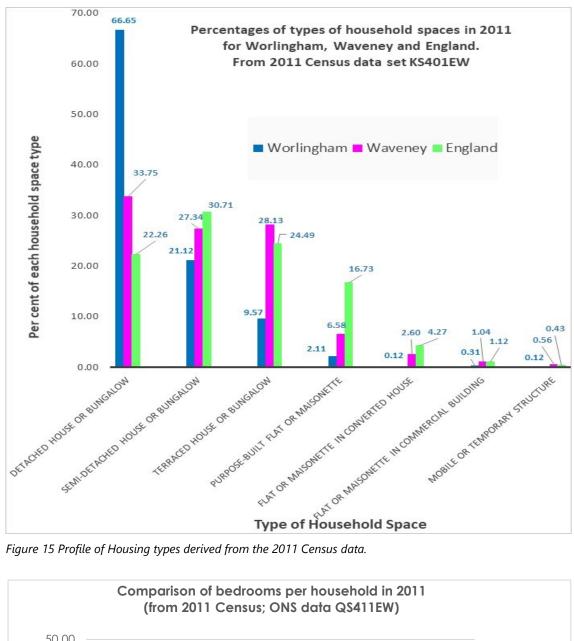


Figure 15 Profile of Housing types derived from the 2011 Census data.



Figure 16 Profile of Housing Sizes derived from 2011 Census data.

2.43 It is important to understand how the mix of housing relates to the needs of the community. The occupancy rating measures whether the household's accommodation is overcrowded or under occupied. An occupancy rating of -1 indicates that the household has one fewer room than is required, whereas a rating of +1 indicates that they have one more room than is the standard requirement. See Figure 17.

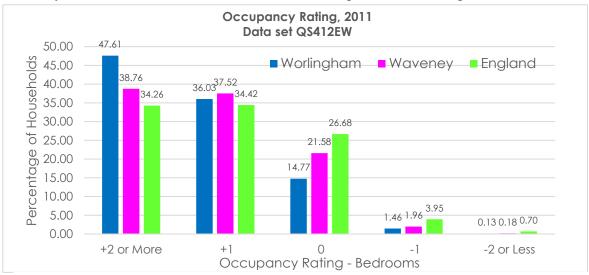


Figure 17 Profile of Occupancy rating derived from the 2011 Census data.

- 2.44 From the above figure, it can be seen that the majority of households in Worlingham have one or more bedrooms than they require. The number of households in Worlingham having two or more bedrooms than required is significantly higher than for the former Waveney area or for England. This suggests that the profile of house sizes is, generally, more than meeting essential needs.
- 2.45 The tenure profile (see Figure 18) of these dwellings shows that approximately 82.6% of households own their home (either with or without a mortgage). This is higher than is the case for the former Waveney area, for the region, and at the national level.

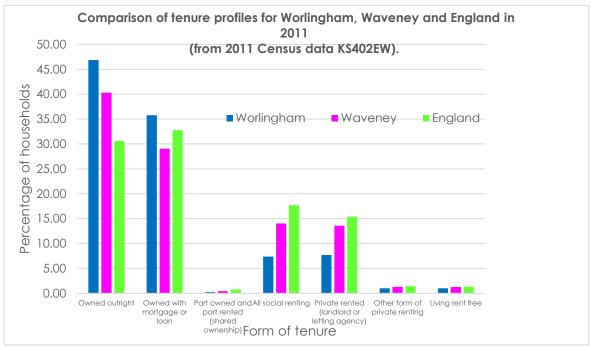


Figure 18 Tenure profile derived from the 2011 Census data.

Local infrastructure

- 2.46 The infrastructure of Worlingham has to be seen in the context of its proximity to the nearby market town of Beccles. Many elements of its infrastructure or lack thereof reflect this. Despite the size of its population, as it has access to the facilities of Beccles, Worlingham does not have "larger village" status for planning purposes.
- 2.47 The completion of the A146 bypass, to the north, relieved the Lowestoft Road of its duty as the main route to Lowestoft from the west. However, through-traffic issues, including noise and speeding remained a reported nuisance, in part due to the growth of activities in and around the areas known as the Beccles Business Park and the Ellough Industrial Estate. (Much of the nuisance being from H.G.V. vehicles and, seasonally, from farm vehicles and slurry transporters.) The Worlingham Parish Plan (April 2009) documented many of these concerns and led to the provision of 30 m.p.h. signage and a pedestrian crossing. Anecdotally, the more recently introduced Southern Relief Road has gradually reduced the level of H.G.V. traffic passing through the village. In particular, there are noticeably fewer loudly clanging vehicles of the type used for the transport of aggregate.
- 2.48 The convergence of Lowestoft Road and Ellough Road, at a traffic-signal controlled junction, and the westwards progression of traffic from there along the Lowestoft Road into Beccles are rush-hour "pinch points" (see also Section 7). Concern surrounding this junction is reflected by two mentions in the East Suffolk (Waveney) Local Plan (i.e. on page 14 and in paragraph 3.16 on page 98).
- 2.49 Levels of parking provision are not uniformly adequate for the needs of residents in an area where car dependency is necessarily high. In at least one part of the village, covenants (i.e. parking is not permitted on the driveway or in front of the property) applying to houses having garages have proved unrealistically restrictive. (See Section 7 for more information.)
- 2.50 Since the combining of the former primary school with the former middle school on the latter's premises (following Suffolk County Council's decision to move from a three-tier to a two-tier schooling system), traffic congestion and parking in and around Garden Lane at "drop-off" and "pick-up" times have become very inconvenient to nearby residents.
- 2.51 There is no secondary school in the village. There are two in Beccles, one of which has a sixth-form college.
- 2.52 Buses (First Eastern Counties) between Lowestoft and Norwich travel along the Lowestoft Road, through the village and into Beccles at typically fifteen- to twenty-minute intervals. The timetables are subject to periodic revision. As of 9 September 2021, the earliest buses on this route reach the main village stops (those by "Kempton Cross") at 07:19 a.m. and 06:21 a.m. for the Lowestoft-bound and Norwich-bound weekday services respectively. The journey times are typically thirty-five to forty-five minutes to Lowestoft and about sixty minutes to Norwich. The last weekday buses to Lowestoft and to Norwich are currently at 11:44 p.m. and 10 p.m. respectively. Also stopping at Kempton Cross is a daytime-only bus service (Border Bus) connecting Norwich and Southwold (via Kessingland). In addition, Border Bus runs a local service connecting Worlingham and Beccles that stops on side roads such as Park Drive and Hillside Avenue, and there is a bookable community service for travel to various hamlets in the wider locality. There is no direct bus service to James Paget Hospital in Gorleston.

- 2.53 Travel by car is overwhelmingly the mode of travel adopted by Worlingham residents for commuting to work. The diverse places and hours of work are most practicably accommodated in this way and for many it is the only viable option.
- 2.54 There are 37 Affordable Housing sheltered properties for persons over 60 years of age and having support need. There is no nursing home provision in Worlingham, so once residents require care within institutions they must leave the community.
- 2.55 Although there is a pharmacy, there is no medical centre in the village. Residents use the Beccles Medical Centre.
- 2.56 With the ageing population and the ongoing in-migration of retired people from other areas, the demand for good access to primary health services will increase.
- 2.57 Located in Hillside Avenue, off the Lowestoft Road, is a small parade of shops. The general store sells a limited selection of chilled, frozen and ambient foodstuffs, sweets, greetings cards, cigarettes, alcohol, lottery tickets, mobile phone "top-up" vouchers and some stationery items. It also provides a Post Office service and hosts an externally located ATM machine. The other shops comprise a hairdressing and beauty salon, a "fish and chip" shop and a newsagent.
- 2.58 The church is located along the Lowestoft Road, towards the east of the village. Behind it is a field (All Saints Green, see Section 8.18) used for the village fete.
- 2.59 Further to the east, also along the Lowestoft Road, is a second-hand car dealership. There is no fuel station in the parish.
- 2.60 A privately run household-waste recycling centre, charging fees for waste acceptance, is located in the southeast of the parish within the area known as the Ellough Industrial Estate.
- 2.61 There are no full-size playing fields within the parish.
- 2.62 A walking route extends northwards, through the Broads area, from the eastern end of the parish to the River Waveney, and then westwards to Beccles.
- 2.63 A community centre and housing is to be built on the site of the former primary school.
- 2.64 In part due to the clay substructure, the accumulation of run-off rainwater in the drainage network has caused localised issues. The Woodfield Park and the Park Drive play areas, in particular, have had problems. Also, the local sewerage treatment capacity is close to its limit. The latter will require addressing by Anglian Water to facilitate the further growth of the village.

Local Plan Policy

(Quotation marks surrounding paragraphs denote material reproduced from the East Suffolk (Waveney) Local Plan.)

2.65 Hitherto, for planning purposes, Worlingham has been considered together with the nearby market town, Beccles, as "Beccles with Worlingham". This continues to be the community segmentation context employed within the East Suffolk (Waveney) Local Plan (covering growth over the period 2014 to 2036). The Local Plan for the Broads does not have any specific policies that relate to Worlingham, although any proposals will be assessed against the relevant Strategic and Development Management policies.

2.66 East Suffolk (Waveney) Local Plan Vision for Beccles and Worlingham in 2036:

"Beccles will have continued to fulfil its role as the largest market town in the District serving its local population including Worlingham and the surrounding smaller towns and villages in Waveney and South Norfolk such as Ringsfield, Gillingham and Toft Monks. Beccles, together with Worlingham will have grown at a rate similar to that experienced over the last 20 years and the larger population will support and improve the town centre and services and facilities in the town to the benefit of residents and tourists alike. New development will have been supported by good infrastructure and services including a country park.

The sensitive natural environment to the north of the town will have been protected. The separate identities of the two settlements will also have been preserved. New development will be of an exceptional quality of design including greener environments serving both existing and new residents. The delivery of the Southern Relief Road will have opened up new opportunities for growth and will have diverted heavy goods traffic from the sensitive town centre. Additionally, access to the Ellough employment area by modes other than the car will have been improved."

East Suffolk (Waveney) Local Plan Strategy for Beccles and Worlingham

- 2.67 The strategic allocation policies directly bearing on Beccles and Worlingham are WLP3.1, WLP3.2 and WLP 3.3. Of these, only WLP 3.1 pertains to actual development within the Worlingham Neighbourhood Plan area.
- 2.68 Policy WLP3.1 provides for the creation of the "Beccles and Worlingham Garden Neighbourhood" (comprising housing, facilities and employment).
- 2.69 Policy WLP3.2 pertains to land west of London Road, Beccles, which is designated for housing development.
- 2.70 Policy WLP3.3 pertains to land south of Benacre Road (at Ellough Airfield, Ellough) for employment.

The Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1)

- 2.71 The site for the Beccles and Worlingham Garden Neighbourhood is bounded by the new Beccles Southern Relief Road to the south, Ellough Road to the east, M&H Plastics to the west and the extant residential edges of Beccles and Worlingham to the north.
- 2.72 A former scrapyard is near the centre of the site and woodland lies along part of the western edge, but the majority of the site is in agricultural use. Industrial sites are situated nearby, to the east and the southeast.

2.73 The Beccles and Worlingham Garden Neighbourhood outline masterplan⁶ is reproduced below from the East Suffolk (Waveney) Local Plan document.



Figure 19. Outline Masterplan for the Beccles and Worlingham Garden Neighbourhood.

- 2.74 The final detailed masterplan should be informed by ongoing engagement with the community.
- 2.75 "Neighbourhood Plans for Beccles, Worlingham and Weston can play a role in shaping the detailed design of development in this area, promoting local distinctiveness."

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⁶ <u>Beccles-and-Worlingham-Garden-Neighbourhood-Masterplan-Report.pdf</u> (eastsuffolk.gov.uk)

3. VISION AND OBJECTIVES

Challenges for Worlingham

- 3.1 Worlingham Parish (the neighbourhood plan area) faces a number of challenges over the coming years (i.e. to 2036). Those that the Neighbourhood Plan seeks to address or influence are:
 - the loss of younger residents and families, which is thought to be at least partly due to the cost of housing;
 - constraints upon the downsizing choices (including retirement/nursing home provision, sheltered housing, and small, manageable dwellings) for the projected rapid increase in the number of older retirees;
 - retention of the sense of community within the parish and the distinctive identity of Worlingham as both it and the neighbouring community of Beccles grow;
 - accommodation of the growth requirements of the residential and employment neighbourhoods within the parish, yet improving ease of movement;
 - retention and improvement of valued open spaces in the face of development pressures;
 - limitations of the current public transport system to offset the need for private car use, particularly for commuting to distant places of work.

Vision for Worlingham

3.2 In 2036, Worlingham has achieved and maintained the strong beliefs of its community. It remains a safe, low-crime, healthy and relatively prosperous place in which to live. It has retained its identity as being distinct from that of Beccles, the local market town, by preserving its natural, countrified setting of mature trees and hedgerows, which date back to its origins within Worlingham Hall garden estate together with replicating these rural features into all new developments.

A mix of housing needs has been met across the private and affordable housing sectors and much of the green spaces between Worlingham and Beccles has been retained. Housing solutions have been achieved which have permitted more young families and single people to stay in the parish. Similarly, those older residents who had found their previous homes too large to manage have been able to downsize without leaving the community.

Developments have been sensitive and in keeping with the visual character of the village and the landscape. The setting of the Broads in Worlingham has been protected.

Green spaces with good amenity value have been achieved, e.g. small overlooked parks in the new developments, and wildlife corridors have been preserved.

Any retail infrastructure associated with new developments is readily accessible to the wider community and is complementary to the established businesses, rather than being direct duplications.

Concerns about the growing population pressures on the Beccles Medical Centre have been addressed, and steps have been taken to improve its accessibility.

Sports facilities, sensitively located, have been developed, meeting younger residents' needs, as identified in the Parish Plan⁷.

Movements between the residential areas and the industrial areas of the parish can be conveniently undertaken by bus, on foot, or by bicycle as well as by car. Sufficient well-designed off-road parking, both for residents' and visitors' vehicles, has been provided in the new developments to minimise traffic bottlenecks (e.g. to bus movements) and blind spots.

Improved public transport has enabled easier, direct commuting to a wider range of distant job centres (e.g. Norwich industrial areas, Lowestoft, Halesworth, Bungay), reducing dependency upon car ownership.

The new Community Centre has been a great success in knitting the community together.

Neighbourhood Plan Objectives

- 3.3 The objectives of the Neighbourhood Plan as identified through engagement with the community are as follows:
 - A. A mix of housing is delivered which addresses the range of needs of Worlingham, including first-time buyers and elderly residents wanting to downsize.
 - B. The design of development seeks to maintain the character of Worlingham, particularly in respect of housing.
 - C. Development seeks to provide a safe environment through use of traffic calming measures and the provision of sufficient off road parking.
 - D. Increased traffic impact will be assessed and mitigated by the developers.
 - E. The green spaces, wildlife habitats, landscapes and heritage assets that define the character and natural environment of Worlingham will be protected and enhanced.
 - F. Achieve, together with Beccles, new sports and play facilities on the Beccles and Worlingham Garden Neighbourhood that meet the needs (such as those captured in the Worlingham Parish Plan) of the community.

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⁷ Worlingham Parish Plan, published April 2009.

4. PHYSICAL LIMITS AND VILLAGE IDENTITY

Physical limits

- 4.1 Settlement boundaries (Policy WLP1.2) across the former Waveney area are defined on the Policies Map that forms part of the East Suffolk (Waveney) Local Plan. Land outside of the settlement boundaries and the allocations in that local plan and in neighbourhood plans is considered as the Countryside.
- 4.2 The Worlingham Parish Development Context Map shows the relationship of the settlement boundary to the parish boundary. It also indicates the industrial area within Worlingham and the extent of the former farm land designated under East Suffolk (Waveney) Local Plan policy (WLP3.1) for use as part of the Beccles and Worlingham Garden Neighbourhood. (Note: Not shown is the newly designated employment development outside the parish, to the south of the Benacre Road, under Policy WLP3.3.)

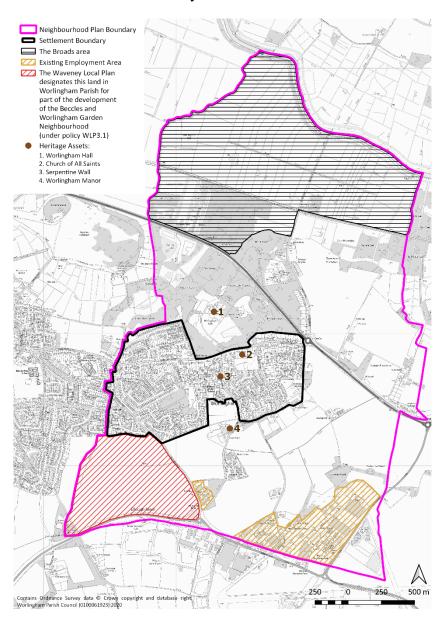


Figure 20. Worlingham Parish Development Context Map

- 4.3 Given the scale and comprehensive nature of the East Suffolk (Waveney) Local Plan Policy WLP3.1, this Neighbourhood Plan will not allocate further sites within or outside the settlement boundary for development of any nature. Nor does it seek to modify the settlement boundary.
- 4.4 However, and notwithstanding the prevailing policy of the local health authority not to augment community health provision away from the environs of the Beccles Medical Centre, this Neighbourhood Plan would provisionally welcome any future proposals to create a satellite medical centre to address travel issues, particularly for the very elderly.

Village identity

- 4.5 The Neighbourhood Plan intends that Worlingham remains a place that is distinctive within its market-town adjacent context, i.e. comprising a part of the tranquil setting of the Broads; peaceful residential areas with gardens, much greenery and predominantly within-curtilage parking; heritage assets; a highly regarded school; and a developing employment area. In terms of architecture, the Neighbourhood Plan is not highly prescriptive but requires that "windfall" and allocated residential development in and around the settlement area (see figure 20) reflects the prevailing outer-suburban "area type".
- 4.6 Apart from village-signage cues, the separation between the existing settlement areas of Worlingham and Beccles only remain apparent to the north of the Lowestoft Road and to the south of the Bluebell Way estate. In the latter case, the topography of the greenfield land and the disposition of the housing in Beccles, away from the shared parish boundary, confers a sense of demarcation (see also paragraphs 2.13 and 2.14).
- 4.7 The setting significance of the above referenced open countryside (north of the Lowestoft Road) between Marsh View (in Beccles) and Park Drive (in Worlingham) was highlighted in the "Waveney Green Infrastructure Strategy 2015; Beccles and Worlingham Area". Whilst the land concerned is entirely in Beccles parish, it is part of the setting of both communities. A key objective of this neighbourhood plan is to maintain the distinctive identity of Worlingham and, therefore, any protection of the above area of countryside against development would be supported.
- 4.8 In order to achieve settlement identity retention as articulated in the East Suffolk (Waveney) Local Plan vision (see paragraph 2.66) and in the vision and objectives of this Neighbourhood Plan (see Section 3), careful attention is required wherever future development is proposed for the vicinity of the parish boundary. In particular, in regard to the Beccles and Worlingham Garden Neighbourhood (which will lie between the new Beccles Southern Relief Road and the Bluebell Way estate), it would not be compatible with this objective if the finalised masterplan were to convey the impression of a new housing estate that annexes the south-west portion of the parish of Worlingham into Beccles. Ensuring delineation of the applicable part of the parish boundary is important. The clearest way to achieve this would be by avoiding the development of properties (residential, industrial and commercial) that straddle the boundary. Where this is not possible (e.g. for land-use reasons), the incorporation of architectural and/or landscaping design features/cues to acknowledge the presence of the boundary will be

⁸ National Model Design Code: Part 1 - The Coding Process (publishing.service.gov.uk)

required.

- 4.9 The East Suffolk (Waveney) Local Plan Policy WLP3.1 requires engagement with the community to take place as the masterplan for the "Garden Neighbourhood" is finalised. All opportunities to achieve separation of the housing along the entirety of the western parish boundary within that area should be explored. Ideally this would involve a full-length green corridor or a break of some form in the development's layout (90.1% of 962 questionnaire respondents selected "Yes" to the question: "In order to maintain the identity of the village, should there be a green open space that clearly defines the boundaries?"). Perhaps this might partially be contributed towards through the layout of the facilities and the design of the landscaping that is to be provided within the required "hub zone", for example.
- 4.10 As plans are advanced for a long-needed Worlingham Community Centre, which is to be built on the site of the former primary school in Rectory Lane, a similar facility associated with the masterplan development for the Garden Neighbourhood should either not be placed fully within the Neighbourhood Plan area or should complement rather than compete with the aforementioned community centre.
- 4.11 Differing character areas or design approaches either side of the Beccles/Worlingham parish boundary would also assist in demarcating the location of the shared boundary (see also Section 5 for housing design).

Policy WORL1: Village Identity

- A. Development proposals in Worlingham must demonstrate how the identity of Worlingham is to be respected, meeting as far as possible feedback as gathered through community engagement. Particular attention must be shown as to how the proposals:
 - Demonstrate that new community facility proposals have been informed by engagement with the community and positively respond to the community's needs and aspirations as set out in the Neighbourhood Plan Objectives.
- B. Development proposals for the Beccles and Worlingham Garden Neighbourhood within the Worlingham Neighbourhood Plan area must demonstrate how they will promote the local distinctiveness of Worlingham, in particular addressing the importance of:
 - the parish boundary. Proposals for the new development must demonstrate a strategy to effectively delineate the parish boundary and support appropriately designed, locally distinctive development in the parish of Worlingham.
 - meeting the design requirements of Policy WORL4;
 - having a clear predominance of within-curtilage parking in a mix of residential parking solutions;
 - a high proportion of homes having gardens of sufficient size, shape and access to sunlight for the provision of recreational benefits to the occupants;
 - there being a clear demarcation between public and private land;
 - trees forming the core of landscaping;
 - achieving an overall density of dwellings commensurate with an outer-suburban area type of about 30 dwellings per hectare.

5. HOUSING

- 5.1 The most recent (2017) Strategic Housing Market Assessment (SHMA)⁹ captures the Objectively Assessed Need at Waveney level and underpins the planned level of housing growth within the East Suffolk (Waveney) Local Plan.
- 5.2 The only housing allocation directly applicable to the Worlingham Neighbourhood Plan area is that under the Local Plan Policy WL3.1 (Beccles and Worlingham Garden Neighbourhood). There are, however, several windfall sites within the physical limits boundary (most particularly on the site of the former primary school in Rectory Lane) that have either recently been completed or have planning permission and that are included in the overall housing targets for the Beccles and Worlingham area for the period 2014-2036.
- 5.3 This neighbourhood plan welcomes the East Suffolk (Waveney) Local Plan policy WLP8.33 (Residential Gardens and Urban Infilling), which is intended for applications for new dwellings on gardens and other plots of land (such as parking areas) in urban areas.
- 5.4 It is understood that those extensions and garden buildings which do not meet the requirements of permitted development will be mainly covered under the East Suffolk (Waveney) Local Plan Policy WLP8.29 (Design). This is also welcome as residents have been perturbed by imposing extensions to neighbouring properties.

Affordable Housing

- 5.5 It is not the intention of the Neighbourhood Plan to put forward an affordable housing policy. The aim is to work together with East Suffolk Council in achieving the appropriate local level of affordable housing provision as specified in the East Suffolk (Waveney) Local Plan, subject to preserving community sustainability and cohesion.
- 5.6 The Beccles and Garden Neighbourhood (Policy WLP3.1) is to ultimately comprise approximately 1,250 homes. Of these, 1,055 are expected to be delivered in the plan period to 2036. On the basis of Policy WLP8.2 (Affordable Housing), 30% of the 1,250 homes (i.e. 375) across the development should be affordable.
- 5.7 Policy WLP8.2 also states: "Of these affordable dwellings, 50% should be for affordable rent. Sheltered and extra-care housing should be included as affordable units where needed and where practicable."
- 5.8 A proposal for development of the former primary school site in Rectory Lane will, once approved, enable the construction of a community centre alongside nineteen market houses. The commercial viability of this proposed development unfortunately does not extend to the provision of any affordable housing.

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⁹ Strategic-Housing-Market-Assessment-Part-1.pdf (eastsuffolk.gov.uk)

Housing Mix

- 5.9 Given that the Beccles and Worlingham Garden Neighbourhood is treated under a single Local Plan policy (WLP3.1) although it spans distinctive settlements, this Neighbourhood Plan will set out additional policy requirements for housing mix to ensure compatibility with the needs of Worlingham. This is permitted under Policy WLP8.1 (Housing Mix) and is underpinned by the Housing Needs Assessment (HNA) for Worlingham. (For reference, Appendix 1 of this neighbourhood plan document tabulates the recommended mix of new housing at the former Waveney area level as derived from the Strategic Housing Market Assessment (Part 2)¹⁰).
- 5.10 The future housing mix for Worlingham should, in particular, acknowledge the following factors that distinguish the neighbourhood plan area from that of Waveney:
 - Whereas the introduction to volume 2 of the Waveney-commissioned SHMA (covering the Waveney Housing Market Area) states that "Two main drivers of the housing market are the resident population and the local labour market. They affect the nature of housing demand including household formation rates and households' investment in housing ... ", in the cases of Worlingham and Beccles in-migration is a strong business source for local estate agents and this is in part related to retirees. To some degree, this will have influenced the "ageing" of Worlingham (see, for example, paragraph 2.29 of this document) during the period 2001 to 2011. Indeed, some of the many contributors to the neighbourhood planning activities entered the community as retirees during the aforementioned period.
 - The existing profile of housing stock in Worlingham is very different to that of Waveney. It is dominated by detached properties (see paragraph 2.41). It also has much higher percentages of four-bedroom homes and spare rooms (see paragraphs 2.42 and 2.43). Thus the starting point concerning housing mix differs markedly to that of Waveney as captured in the Waveney SHMA, even though both population groupings face similar demographic challenges.
- 5.11 This Neighbourhood Plan (see Section 3 for Objectives) considers that there are three broad housing market needs to prioritize: downsizing retirees; young families and single people; and general family housing.
- 5.12 Younger retirees may have different needs to older ones. Certainly in the case of Worlingham, potential downsizers currently have little or nothing to find in the one-bedroom category. There are only 54 one-bedroom households in the village, representing about 3.4 per cent. And most of the one-bedroom dwellings are of the sheltered housing variety, leaving few to come to market at any given time.
- 5.13 The hollowing out of the village's age profile in the age group 25-44 is something the Neighbourhood Plan wishes to arrest. There may be various socio-economic factors at work, some of which are beyond the capabilities of a village neighbourhood plan. However, to the extent that housing affordability is an issue, some steps may be taken.

¹⁰ Microsoft Word - SHMA Pt2 24th May - ERRATA (eastsuffolk.gov.uk)

The format of homes (i.e. detached, semi-detached, terraced, etc.) has a major impact upon affordability. If the new developments have significantly below the current proportion (66%) of detached dwellings, a substantial improvement in general affordability should be achieved for young families and single people. This would primarily involve a move towards semi-detached and terraced properties.

- 5.14 For the general family housing sector, which may be more aspirational regarding format and size, there should be a greater emphasis, relative to that required at Waveney level (see Appendix 1), on new three-bedroom properties. This is because family sizes are projected to decline and there is already a comparatively high percentage of four-bedroom dwellings in the village. Nonetheless, some provision of larger dwellings to maintain balanced communities and to service any developing need, for example, for working from home, will still be required.
- 5.15 Policy WORL2 requires the housing mix recommendations from the SHMA to be adapted where the HNA evidence provides justification.
- 5.16 Proposals for new housing that deviate from the requirements of Policy WORL2 must provide underpinning evidence based on local needs and be agreed with the local planning authorities.

Policy WORL2: Housing Mix

The mix and type of new housing units proposed for the Worlingham Neighbourhood Plan area, including on the part of the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1 of the East Suffolk (Waveney) Local Plan) within the Neighbourhood Plan area, must be based on evidence contained within both the Worlingham Housing Needs Assessment (2017 or successor document) and the District level Strategic Housing Market Assessment (or successor document). In particular, schemes must demonstrate how they have considered and addressed the need for provision of:

- a. One and two bedroom dwellings suitable for older people;
- b. Bungalows;
- c. Semi-detached and terraced properties suitable for young people; and
- d. Three-bedroom, family-sized housing.

Housing Design

5.17 Given the ageing population of Worlingham, it is important to ensure that the requirements of Policy WLP8.31 result in at least 40% of the new dwellings provided on the Beccles and Worlingham Garden Neighbourhood site that fall within the Worlingham Neighbourhood Plan area meet the accessible and adaptable homes M4(2) standard. Therefore, Policy WORL3 makes clear that any application on the Garden Neighbourhood must ensure that at least 40% of the proposed new dwellings within Worlingham parish meet the M4(2) standard. (As planning applications for the Garden Neighbourhood may span the parish boundary, without Policy WORL3 it is conceivable

that Policy WLP8.31 could otherwise be met in a way that leads to fewer than 40% of the units built within Worlingham meeting the standard.)

Policy WORL3: Lifetime Design

Within the part of the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1 of the Waveney Local Plan) that falls within the Worlingham Neighbourhood Plan area, at least 40% of dwellings built within the neighbourhood area must meet requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings.

5.18 The village of Worlingham originally grew along and spread out from the Lowestoft Road. Over the decades it has experienced extensive growth, mainly in the form of successive developments of housing estates to the south. It is difficult to identify a particular typical or characteristic architecture as there is wide variation across the parish. Figure 21 shows the eight differing "character areas" that have been identified.

Areas 1 (Park Drive area), 2 (Lowestoft Road), 3 (Hillside Avenue) and 6 (Garden Lane) are the older developments. Areas 4 (Bluebell Way estate), 5 (Cedar Drive estate) and 7 (Werel's Loke estate) are modern estates, Area 7 being the newest. Area 8 (Marsh Lane) is outside the settlement boundary (i.e. "Countryside"), as is the eastern branch of Area 2.

Photographs and key features of the individual character areas are included in Appendix 2. The maps for each character area are in Appendix 3.

- 5.19 The primary overarching features of the above housing areas are:
 - Low rise, overwhelmingly one- and two- storey in nature;
 - Gardens. (This is a feature that came up in the interview with a local estate agent as being highly attractive to young families and a distinguishing point relative to Beccles);
 - Dwellings set back from the pavement/road by either front gardens or grassed verges, giving separation from passers-by. (Note: Building to the edge of the pavement is a feature of properties close to the centre of Beccles and is not a characteristic of Worlingham.) The pervading effect is one of a green "urban-scape", even though much of this is effected within property curtilages.
 - Off-street parking is predominantly within curtilage;
 - Absence of an impression of urban "sprawl".

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¹¹ Worlingham Character Assessment.

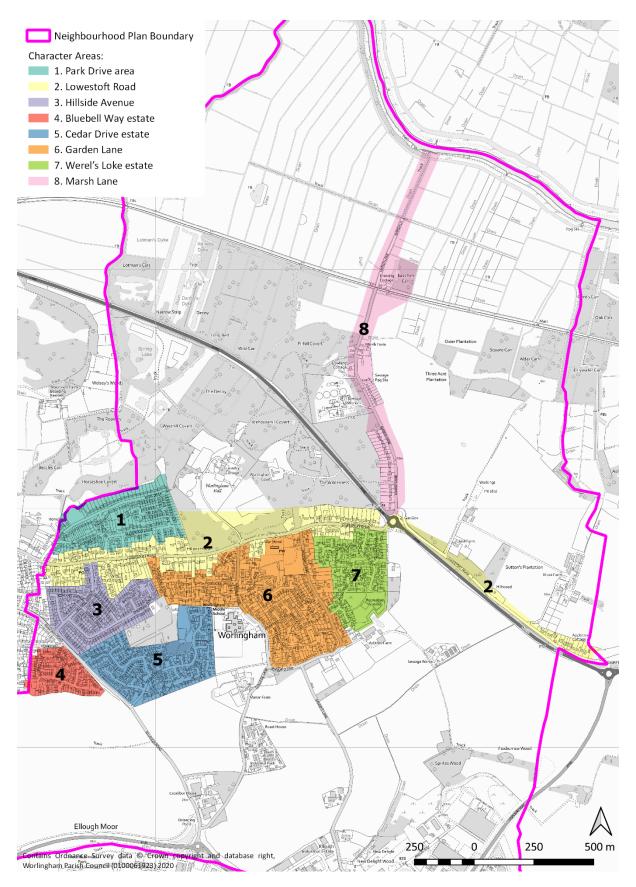


Figure 21. Worlingham Housing Character Areas

- 5.20 Although 85.4% (820 people) of the respondents to the Neighbourhood Plan Questionnaire's question "Should new developments blend with the styles of the existing developments in Worlingham?" selected "Yes", the variety of styles present across the village seemingly provides considerable architectural leeway for new housing estates.
- 5.21 94.1% (952 people) of the respondents to the Neighbourhood Plan Questionnaire answered "Yes" to the question: "Is it important for landscaping to be provided so that developments blend in with the surrounding countryside?" This is particularly important where the land slopes, such as on the northern part of the land allocated for the Garden Neighbourhood. In such areas, it is important that the design and layout ensures mid-distance views of the countryside are retained. Hard edges to development which block sight of the open countryside should be avoided.
- 5.22 The Bluebell Way estate and the Cedar Drive estate incorporate sections of "Serpentine wall" into their peripheral street settings, giving desirable visual linkages to historical Worlingham. See Figure 22 below.



Figure 22. Serpentine wall at the entrance to the Bluebell Way estate.

- 5.23 There are long views from the new Beccles Southern Relief Road towards the 16th century Church of St Michael in Beccles. Long views of this church should also be incorporated into the Worlingham part of the Beccles and Worlingham Garden Neighbourhood development.
- 5.24 Using Building for Life 12¹² as a starting point (since superseded by Building for a Healthy Life¹³), the Worlingham Character Assessment compared the eight character areas and derived positive aspects to which new developments should have regard.

¹² Building for Life 12 0.pdf (designcouncil.org.uk)

Building for a Healthy Life BHL - Designing Buildings

- 5.25 Landscaping plays a major role in distinguishing the village of Worlingham from its neighbouring market town. It is important that new developments are in keeping with the visual character of the parish (see Section 3 (Vision for Worlingham) and Section 8 (Landscaping)). Outside the settlement boundary (Figure 20), the residential arrangements are largely rural or village-like in nature and within it the environment is typically "outer suburban" (as opposed to "urban" or "suburban"). Well-designed landscaping is a way of linking the expanding settlement region with its surroundings. For example, long views of the tall trees associated with the Worlingham Hall estate can be appreciated from many parts of the existing housing developments. Aided by topography, the landscaping within the housing developments provides some views in which the greenery of the foreground complements the historical treed background so as to promote a unified sense of place. Similarly, through the placement of individual landscape treatments within a development so that they visually interact or "flow" (i.e. in short and middle views), cues of the wider semi-rural setting can be created. This requires that the layout of streets and the treatment of the associated landscaping be considered as a unified exercise, one that takes into account both topography and the relationships to longer views.
- 5.26 Policy WORL4 applies throughout the Neighbourhood Plan area. It is additional and complementary to the respective Design policies in the East Suffolk (Waveney) Local Plan and the Broads Authority Local Plan. Policy WORL4 requires development proposals, regardless of location, to be respectful of the setting of the extensive Broads area that lies within the northern part of the Neighbourhood Plan area, for example by ensuring that external lighting is fully justified and well designed ¹⁴ to shine where it is needed, so as to protect the dark skies of the Broads against light pollution.

Jvva

¹⁴ Towards-A-Dark-Sky-Standard-V1.1.pdf (southdowns.gov.uk)

Policy WORL4: Housing Design and Character

As appropriate to their scale, nature and location, residential development proposals must demonstrate, where relevant, how they have taken account of the following positive aspects representing the character of Worlingham through high-quality design and layout. They will be supported subject to meeting the following criteria:

- a. Use of the topography of the site to maintain the visibility of distant notable features and maximise the effect of landscaping treatments, e.g. by developing some views within which separate areas of landscaping appear to visually merge or flow into one another and/or with the distant surrounding treed landscape;
- b. Minimise the impact of development on higher ground by careful siting and by comprehensive landscaping;
- c. Maintain sight lines at street corners, avoiding abrupt or blind turnings unless it has been demonstrated that this is not possible;
- d. Gardens having sufficient size, shape and access to sunlight for the provision of recreational benefits to the occupants;
- e. Clear demarcation of private and public land, ideally through the use of highquality landscaping;
- f. Mix of housing types and sizes along a single street frontage in order to avoid a regimented appearance;
- g. Homes providing good natural surveillance of the streetscape, walkway and cycleway links to neighbouring developments, and any nearby facilities;
- h. Siting and design of any associated new facilities and/or employment development such that these do not lead to significant causes of nuisance to residential areas;
- i. Highly permeable residential layout for cyclists and pedestrians moving within and through the development, and permeable within the development for carusers too;
- j. Landscaping that provides a sense of separation and privacy between neighbouring developments;
- k. Unobtrusive design of dedicated storage for bins;
- I. Boundary treatments should be in keeping with the historic, rural character of Worlingham. Where a hard boundary is deemed appropriate (for example, for clear reasons of security or privacy), the use of "Serpentine" walls in order to provide a link to historical Worlingham is encouraged;
- m. Respectful of the tranquil setting of the Broads and protecting of its dark skies, e.g. lighting needs to be fully justified and well-designed to shine only where it is needed.
- 5.27 From the residents' responses concerning the acceptable limit upon the number of storeys in new housing developments, 4.4% selected one storey; 68.3% selected two storeys; 21.3% selected three storeys; 1.6% selected "greater than three storeys"; and 4.5% gave no opinion.

5.28 One- and two-storey dwellings account for the great majority of dwellings in Worlingham. (There is a very small number of three-storey dwellings of a "chalet style" design located in the adjoining eastern edge of Beccles.) As such, this sets the "context height". Therefore, if a new estate were to have dwellings with more than three storeys, it would be severely out of context to the character of the existing built-up area. Of particular concern would be the loss of openness that tall buildings located close to the street frontage would cause. Whilst the Beccles and Worlingham Garden Neighbourhood is a very sizeable strategic site, any parts of it that create an urbanised feel through the use of tall buildings enclosing the openness would be out of character with Worlingham.

Policy WORL5: Heights of dwellings

- A. In order to reflect the character of Worlingham, residential development is expected to reflect the prevailing context height of the surrounding area. In general, this is never more than three storeys.
- B. Heights of residences with more than three storeys will only be permitted where:i) this does not cause a detrimental visual impact when viewed in the wider landscape context;
 - ii) it can be demonstrated how they have been designed to respond to their context and any visual sensitivities which make up their setting.
- 5.29 "Secured by Design" is the flagship police initiative founded on the principles of crime prevention and designing out crime. It includes standards for doors, windows and locks, and guidance on protection of outbuildings and bicycles. The supporting text for Local Plan Policy WLP8.29 (Design) states that "Development proposals should incorporate 'Secured by Design' principles and encourage natural surveillance over public areas." Although this Neighbourhood Plan similarly does not necessitate accreditation to be obtained under the "Secured by Design" initiative, evidence that certain key aspects of the guidelines have been incorporated in the new development is required.
- 5.30 Security is one reason for the provision of external lighting. A technical guide¹⁶ produced by "Secured by Design" and the "Institute of Lighting Professionals" includes a section on light pollution.

¹⁵ www.securedbydesign.com

¹⁶ <u>Lighting Against Crime | Institution of Lighting Professionals (theilp.org.uk)</u>

Policy WORL6: Housing Design – Security

Any detailed planning application or reserved matters application pertaining to new residential development or to residential property alterations not covered by permitted development rules must be accompanied by a security statement. This statement must demonstrate detailing: how the design and layout facilitates the natural surveillance of parking areas, outbuildings, public spaces and pedestrian routes, and in locations within or with potential to impact on the dark skies in the Broads Authority Area, how any external lighting provided for security reasons reflects the requirements of Policy WORL4(m).

6. INFRASTRUCTURE

Sports Facilities

- 6.1 The Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1) is to be associated with a range of facilities and infrastructure. These facilities will both serve the new residents and meet some unmet needs of the existing communities. (See non-policy action area 10.4(c).)
- 6.2 The Parish Plan (2009) documents the desire for more sporting facilities in Worlingham with keep fit/aerobics and badminton coming top of the list across a wide age range. There is also a need for both indoor and outdoor sporting facilities. The new Worlingham Community Centre that is planned for the former school site should meet some of these needs. However, there also exists among younger residents unmet demands for a swimming pool and for a skate park. (The latter demand has emerged since the Parish Plan, although there is a skate park in Beccles. Worlingham Parish Council has provided two sessions each year of a mobile skate park, held in the grounds of the school, over several years. When the weather has been good, attendances have been up to 90.)
- 6.3 The outline masterplan (Policy WLP3.1) shows a sports area and a multi-use games area within the Worlingham segment of the development. The successful delivery of these facilities will require close engagement between the developer and the communities.
- 6.4 Suitable mechanisms for the management of the sports and also play facilities within the Worlingham part of the Beccles and Worlingham Garden Neighbourhood should be sought through close engagement with the local community.

Policy WORL7: Sports Facilities

Proposals for sports and recreation facilities on the part of the Beccles and Worlingham Garden Neighbourhood that falls within the Worlingham Neighbourhood Plan Area must demonstrate that they have been informed by meaningful and effective community engagement and have been designed to respond to the community's needs and aspirations.

7. TRANSPORT AND MOVEMENT

Residential Parking Standards

7.1 It is a concern of the community that all new dwellings should have sufficient parking spaces to cater for those dwellings. This is based on the experiences of existing dwellings and the amount of unstructured on-street parking.



Figure 23. Parking scene from the Bluebell Way estate.



Figure 24. Parking scene along Woodland Avenue.

- 7.2 Housing developments in Worlingham have not uniformly provided sufficient offstreet parking for the numbers of cars owned by those occupying the dwellings. Nor has street design been uniformly sensitive to parking needs. As a result, there are instances of on-street parking that make it difficult for larger vehicles to pass. It also makes it more difficult for pedestrians who have to cross the road between parked cars or have to step into the road with pushchairs due to vehicles parking on the pavement. (36.3% of respondents selected "parking on pavements" from the options provided to the household questionnaire question: "Do you face any problems getting around Worlingham?")
- 7.3 87.5% of the household questionnaire respondents want there to be prescribed numbers of off-street parking places per dwelling.
- 7.4 Paragraph 2.40 reports that households in Worlingham Parish have about a 25% higher level of vehicle access than those of households at Waveney level or in England. This reflects the commuting patterns (see paragraph 2.40) to diverse places of work and to facilities not available in Beccles. Whilst the East Suffolk (Waveney) Local Plan policies underpinning planned employment growth on the allocated land at Ellough could lead to changing local commuting patterns, until such time there is evidence of this the parking provision should reflect actual local needs. It is, therefore, appropriate to impose minimum parking standards for any new housing development.
- 7.5 The standards in Policy WORL8 below slightly exceed in a targeted manner (see Appendix 4) the guidance for minimum provision in the Suffolk Guidance for Parking¹⁷. The guidance notes that "Although the level of car ownership has increased, the growth of traffic on the highway has not increased to the same level. This indicates that a greater number of vehicles are likely to be parked at the owner's place of residence. It is acknowledged by residents in Suffolk that parking is an issue, especially in residential areas. Hence the move to advisory minimum guidance requirement on

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¹⁷ Parking Standards (suffolk.gov.uk)

- residential parking as promoted within this document."
- 7.6 Whilst a garage is often not used for parking and instead used for storage, it remains popular with residents and for many is a feature looked for when buying homes. Car ports are unpopular with residents for a variety of reasons such as unsightliness and poor amenity. Reserved parking bays are the least preferred form of allocated parking provision (only selected by 1.7% of the respondents to the household questionnaire).
- 7.7 If new cars are to be only fully electric vehicles (EVs) by 2035 (as set out in "The 10-Point Plan for a Green Industrial Revolution" 18), with no new internal combustion engine-only (ICE) cars available from 2030, there will have to be convenient close-by and ubiquitous access to a means of vehicle battery charging. Within curtilage off-street parking does, in principle, enable car charging to be achieved at home without reliance on alternative electrical infrastructure and so facilitate early adoption of non-ICE vehicles. From page 82 of "The Road to Zero" 19: "EVs offer consumers a more convenient and cost-effective way to refuel, with domestic charging playing a crucial role (some studies indicate this accounts for the vast majority of EV charging). We expect that as EVs go mainstream, charging at home overnight, or at workplaces, will continue to be the most attractive options."
- 7.8 On-road parking is associated with higher car insurance premiums²⁰ because of the increased risks of vandalism and collision damage. Whilst the presence of kerbside parked cars may lead to the desirable slowing of traffic, this approach can also lead to small children emerging into the centre of the road in front of passing vehicles. Intrinsic design solutions such as tightness of corner radii at junctions and other traffic calming measures are possible for the influencing of vehicle speeds.
- 7.9 Off-street parking is a prominent feature of Worlingham and should be incorporated as far as possible in new developments, subject to the achievement of a well-landscaped and balanced setting. Where on-road parking provision is proposed, it should be designed so as to encourage user compliance and mitigate the concerns expressed in paragraph 7.8.
- 7.10 Provision is also required for visitors' cars and service vehicles. The growth of online shopping (e.g. for groceries) increases the need for delivery vehicles to gain close-by parking access to properties. This neighbourhood plan reinforces the requirements of the Suffolk Guidance for Parking for new residential developments to provide 0.25 spaces per dwelling for visitor/delivery vehicle parking.
- 7.11 For the example housing-size mixes considered in Appendix 4, the combination of policies WORL2 (Housing Mix) and WORL8 (Parking Standards) lead to an average of around 2.1 (or 2.35, including visitors' parking provision) parking places per dwelling, whereas the combination of the SHMA-derived example housing mixes and the Suffolk minimum standards leads to a similar figure of about 2.13 (or 2.38, including visitors' parking provision) parking places per dwelling. The similarity in parking space requirements for the different housing-mix/parking space combinations

¹⁸ The Ten Point Plan for a Green Industrial Revolution (publishing.service.gov.uk)

¹⁹ The Road to Zero (publishing.service.gov.uk)

²⁰ <u>www.bbc.co.uk/news/business-44483073</u> "Park on the drive and other tips for cheaper insurance." BBC News

is explained by the greater emphasis on the projected need for new 3-bed dwellings (and fewer new 4-bed and 5-bed dwellings) required by Policy WORL2. Further reductions in the number of large homes in the mix would lead to still further reductions in the average number of parking places per dwelling. (For clarity, if the Suffolk minimum parking standards were applied to the example housing mixes (of Appendix 4) associated with Policy WORL2, the average number of parking places per dwelling would decrease by about 4% but would risk not meeting the identified needs (see paragraph 7.4).)

Policy WORL8: Parking Standards

A. Parking provision must meet the requirements of the parking guidance set out in the "Suffolk Guidance for Parking 2019" (or any successor document) unless advised elsewhere in this policy or in Policies WORL9 and WORL10.

B. For all new residential developments within the Worlingham Neighbourhood Plan area, the following minimum standards shall apply for the provision of parking spaces for residents:

1-bed house/flat average of 1.5 parking spaces*;

2-bed house/flat
3-bed house/flat
4-bed house/flat
5+ bed house/flat
4 parking spaces;
4 parking spaces.

*Half of the 1-bedroom dwellings on a new development in the Worlingham Neighbourhood Plan area should have 2 parking places to cater for young working couples. The remainder should have 1 parking place. In the case of a development comprising a single 1-bedroom dwelling, the number of parking spaces should be at least 1.

C. On-street parking to meet the required standards should only be provided where it can clearly be demonstrated that off-street parking is not appropriate for the site, for example due to its size or shape. It should be sited close to the homes served.

Policy WORL9: Design of On-Street Parking Provision

The design of on-street parking provision for all new residential developments in the Worlingham Neighbourhood Plan area must:

- a. Include a layout and landscaping so that cars do not dominate the setting;
- b. minimise the potential for poor parking practices such as pavement parking; avoid obstructing routes and the visibility for all users of the highway, in particular ensuring the safety of pedestrians and cyclists, and that the desire lines of these users are unobstructed;
- c. be recessed as a lay-by or as parking bays so as to minimise the occurrence of disorderly road narrowing and the risk of parked vehicle contact with passing traffic;
- d. have parking guidance marks (such as "T-marks") to encourage considerate space utilisation;
- e. avoid continuous street-length rows of on-road parked vehicles; and
- f. be well overlooked and amenable to good natural surveillance.

Parking Courts

7.12 Whilst parking courts have not featured heavily in Worlingham to date, it is acknowledged they may have a role in future developments. Experience elsewhere (e.g. Kessingland) has shown poorly designed parking courts are unpopular with residents because of the perception of a crime risk. The result can lead to poor take-up of the allocated parking by residents and recourse to on-street parking close to their dwellings. This in turn can lead to pedestrian safety issues and obstruction of refuse collection vehicles, for example.

Policy WORL10: The Design of Parking Courts

Where the provision of parking courts can be justified within a mix of parking solutions for new developments in the Worlingham Neighbourhood Plan area, such provision must demonstrate how design and siting will encourage high levels of usage. The following elements should be incorporated into any design:

- i) Siting well related to the homes or businesses they serve.
- ii) Safe and convenient access for residents or workers.
- iii) Well overlooked and good natural surveillance.

Accessibility

- 7.13 Most roads within the village have pavements. Exceptions are some of the branching roads within the newer estates. (Lack of pavements and narrow pavements were indicated by 11.4% and 29.4% of residents respectively as being problematic for getting around Worlingham.) It is very important that new development provides pedestrian routes that are designed to be wide enough for all users.
- 7.14 Policy WLP3.1 of the East Suffolk (Waveney) Local Plan addresses the requirements for development of the Beccles and Worlingham Garden Neighbourhood. This identifies that pedestrian and cycle links should be provided from a number of existing roads. Within Worlingham parish these are Bluebell Way, Cedar Drive and Foxglove Close. The policy also requires that a cycle path be provided along the boundary of the site with the Ellough Road.

Policy WORL11: Protection and Enhancement of Key Pedestrian and Cycling Routes

- A. New developments in the Worlingham Neighbourhood Plan area must not have a detrimental impact upon the key pedestrian and cycling routes as shown on the Neighbourhood Plan Policies Map and where appropriate should enhance these routes.
- B. The design of the above new developments should where possible provide direct linkages to existing walkway and cycling routes.
- 7.15 Development should enable opportunities to improve walking and cycling where possible. Contributions from the East Suffolk Community Infrastructure Levy is one source of funding that can be used to deliver these improvements. This Neighbourhood Plan sets out below its priorities in this regard.
- 7.16 Cycling provision needs to be complemented by improvements to routes throughout the parish, particularly those that link existing residential areas to the main destinations, including future community facilities at the Garden Neighbourhood. The Waveney Cycle Strategy 2016²¹ identifies a series of improvements that could be made to cycling infrastructure serving Beccles and Worlingham. In the Worlingham neighbourhood area, these are:
 - Lowestoft Road (Hillside Avenue junction to Woodland Avenue junction) extension of existing cycle lanes to Woodland Avenue.
 - Worlingham roundabout improvement of crossings over the A146.
 - Ellough Road (service road) provision of a shared-use path between Ellough Road cul-de-sac and Highland Drive.
 - Beccles Southern Relief Road extension of the shared-use path along the Relief Road as part of the Garden Neighbourhood development to connect with Ellough

²¹ Waveney-Cycle-Strategy.pdf (eastsuffolk.gov.uk)

- Business Park. This cycle path extension would mostly lie in Ellough Parish, running alongside the Benacre Road (from its junction with Church Road) to Anson Way in the south-east of Worlingham Parish.
- Former Worlingham Primary School provision of a shared-use path that would link to the path traversing All Saints Green.
- 7.17 The above proposed improvements along the Lowestoft Road and at the Worlingham roundabout would form part of a package of measures to improve the cycle route along the Lowestoft Road to Beccles. Equally, improvements along the Benacre Road in Ellough Parish would help to improve cycling between the employment areas and the residential areas of Beccles and Worlingham.
- 7.18 The existing key cycling routes²² are shown in the Neighbourhood Plan Policies Map (see Section 11). In effect, there are three key cycle routes:
 - via Lowestoft Road (Route WCR-East/West 1);
 - via Hillside Avenue (Route WCR-East/West 2); and
 - via Rowan Way (Route WCR-East/West 3), connecting the west part of the parish to the east of the parish, and onwards towards Barnby.
- 7.19 Route WCR-East/West 1 would benefit from the improvement described under Spending Priority (i) and Route WCR-East/West 2 would benefit from the improvements described under Spending Priority (ii) and Spending Priority (iii). (See Neighbourhood Plan Policies Map.) One of these improvements (Spending Priority (iii)) would be delivered by the proposed development of the former primary school site (see paragraph 5.8) in Rectory Lane.
- 7.20 The cycle infrastructure to be provided alongside the Ellough Road, arising from the Worlingham part of the Beccles and Worlingham Garden Neighbourhood will support the creation of a new key route (Route WCR-North/South 1), which will help movement northwards towards Beccles and southwards towards the industrial area. (See Neighbourhood Plan Policies Map.)
- 7.21 If the dual use path running alongside the new Southern Relief Road were to be extended through Ellough Parish (as described in paragraph 7.17 and Spending Priority (iv)), a further new key movement route (Route WCR-East/West 4), one connecting Beccles and Worlingham with the Ellough Industrial Estate, would be achieved. (See Neighbourhood Plan Policies Map.)
- 7.22 There is an emerging "Walking and Cycling Plan for East Suffolk"²³ which has identified potential additional cycling/pedestrian routes and possible improvements to existing ones: a new path along the length of Copland Way (LB11); a new path along the length of Hillside Avenue (LB13); targeted improvements (LB14) to the route labelled by this neighbourhood plan as Route WCR-East/West 3; changes at Cedar Drive/Rowan Way (LB15) that would more directly link Route WCR-East/West 3 to

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²² These routes accord with the cycle infrastructure pictured in Figure 5 of the Waveney Cycle Strategy 2016

²³ East Suffolk Cycling and Walking Strategy | Draft 2021 (arcgis.com)

- the Beccles and Worlingham Garden Neighbourhood; and a new path along the Benacre Road (LB10), i.e. exactly as envisaged for the establishment of Route WCR-East/West 4 (see paragraph 7.21 above and Spending Priority (iv) below).
- 7.23 The above new strategy consultation-document's recommendations LB13 and LB15 include elements that raise the possibilities of impeded vehicular movements along Hillside Avenue and Cedar Drive respectively. The effects of such restrictions would need further evaluation, as indicated in the strategy document, before implementation and require engagement with the community, particularly given the latter's unease about the future traffic impact of the new Garden Neighbourhood.

Spending Priorities: Walking and Cycling Routes

The identified priorities for developer contributions through the East Suffolk Community Infrastructure Levy and, as appropriate, Section 106, are as follows:

- i) Along Lowestoft Road, particularly between the junctions with Hillside Avenue and Woodland Avenue, and at the roundabout junction with the A146.
- ii) At Ellough Road (service road) and into Hillside Avenue to the junction with Highland Drive.
- iii) At the former Worlingham Primary School site in Rectory Lane, linking to All Saints Green.
- iv) Linking of the dual use path running alongside the Beccles Southern Relief Road to the Ellough Industrial Estate by provision of an extended path alongside the Benacre Road in Ellough. Only the eastern part of this extension will lie in Worlingham parish (i.e. the approach northwards into Anson Way.)

8. ENVIRONMENT AND GREEN SPACES

Landscaping

- 8.1 This neighbourhood plan welcomes East Suffolk (Waveney) Local Plan Policy WLP8.35 (Landscape Character). The relationship between the existing settlement and its landscape setting is particularly important. The role of landscaping in providing visual connections between the outer-suburban context of most of the existing housing with the surrounding rural and semi-rural settings that constitute the majority of the neighbourhood plan area has been essential hitherto for preserving the character of Worlingham (reference Policy WORL4a). To this end, it is recommended that published guidance²⁴ on the principles of landscape design, covering themes such as Unity, Line, Form, Texture, Colour, Scale, Balance, Simplicity, Emphasis and Sequence, be consulted during the development of landscaping proposals.
- 8.2 The Local Plan for the Broads similarly has policies (particularly SP7, DM16 and DM8) to protect and enhance the character and uniqueness of the landscape of the Broads, and to connect areas of green infrastructure through the layout and design of new developments.
- 8.3 The East Suffolk (Waveney) Local Plan Policy WLP3.1 for the Beccles and Worlingham Garden Neighbourhood seeks to preserve existing hedgerows and field boundaries and the indicative masterplan report addresses edge conditions, green movement routes and landscaping to create a green, leafy environment.
- 8.4 It is important that a well-designed landscaping scheme is achieved on the Garden Neighbourhood, taking into account the topography and preserving a soft edge for existing dwellings. Newly planted trees should be physically supported and protected and should reflect a diverse range of native species. Along main routes these could include oak, sweet chestnut, ash and pine. A good example locally is the tree-lined Lowestoft Road (see photographs later in this section relating to the country park).
- 8.5 As part of the residential development, other types of native prickly trees and shrubs are likely to be more suitable, including hawthorn, blackthorn, rowan, silver birch, crab apple, hazel, dogwood, spindle and buckthorn. Not only will this be good for wildlife, minimise the risks of disease, pests and climate change but it will result in development more in keeping with the character of the area.
- 8.6 As identified in Policy WORL4 (Housing Design and Character), high quality landscaping is particularly important where the topography slopes, such as on the northern part of the Garden Neighbourhood site allocation (see photographs 25 and 26 below). Landscaping must properly take account of this.

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²⁴ (PDF) CMG GardenNotes #413 Principles of Landscape Design | ming farrant - Academia.edu



Figure 25. From the play area at Foxglove Close looking east.



Figure 26. From Foxglove Close looking west

8.7 The Household Questionnaire asked "Should new developments of about 20 houses or more have grassed and tree-lined "open breaks" surrounding them to avoid the perception of overdevelopment and to potentially support the development of linked wildlife corridors." 92.1% of 984 respondents answered "Yes" to this question. To the ancillary question, "If you answered 'Yes' to the previous question, what width do you think the 'open break' should have?', of the 934 respondents, 17.2% selected 10 metres; 28.9% selected 15 metres; 27.4% selected 20 metres; and 13.7% selected 'Greater than 20 metres' (12.9% had no opinion). Plotting the "accumulating percentage of positive respondents" against an increasing width of "open break" shows that an open-break width of 20 metres would satisfy 73.6% of the respondents to the latter question, whereas a width of 15 metres would satisfy only 46.2%. (Note: This question did not consider the potential effects arising from differing degrees of terrain slope.)

Policy WORL12: Landscaping

- A. For all major development proposals (both residential and non-residential, as defined by the NPPF) in Worlingham, the applicant must demonstrate how the design of landscaping throughout the built environment will reference as far as possible, and as most appropriate, the surrounding semi-rural, rural or Broads settings that constitute the majority of the neighbourhood plan area.
- B. Development proposals for the Beccles and Worlingham Garden Neighbourhood within the neighbourhood plan area must:
 - i) Incorporate a comprehensive soft landscaping scheme at the edge of the Beccles and Worlingham Garden Neighbourhood site (described by Local Plan Policy WLP3.1) to achieve a verdant setting for the existing dwellings in the neighbourhood area and which supports routes for movement as indicated on the Beccles and Worlingham Garden neighbourhood outline masterplan. The landscaping scheme must take into account the topography of the area.
 - ii) Demonstrate how the comprehensive landscape scheme for the part of the Beccles and Worlingham Garden Neighbourhood that lies in Worlingham has been shaped by the views of the community as captured in this neighbourhood plan and as further gathered from the community during the masterplan-development process. Evidence of views being sought from the occupants of all adjoining homes must be provided.
 - iii) Demonstrate that the comprehensive landscape scheme for the part of the Beccles and Worlingham Garden Neighbourhood that lies in Worlingham includes a diverse range of shrub/tree species in order to maximise resilience to the risks of disease, pests and climate change, and to benefit native pollinator species.

Country Park

- 8.8 A country park will be incorporated within the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1). Given the increased urbanisation of the two settlements, this should prove to be a valued facility.
- 8.9 The layout and positioning of the country park remains to be settled. In so doing, opportunities should be explored for the country park to assist in the preservation of the respective identities of the two settlements (see section 3) and to allow for ease of pedestrian and bicycle access from multiple directions. (The layout of the country park that is associated with the masterplan for a large Garden Neighbourhood development at Bury St Edmunds demonstrates that elongated forms can be explored.)
- 8.10 The tree-lined, winding Lowestoft Road is the "public face" of Worlingham to passers through (see photographs below). Near the east of the village along this road lies the entrance to Worlingham Hall, the estate of which still occupies much land to the north of the Lowestoft Road and south of the northern bypass (A146).



Figure 27. A view looking east along the Lowestoft Road



the Lowestoft Road.



Figure 29. Main entrance to Worlingham Hall.



Figure 30. A third view looking east along the Lowestoft Road.



Figure 31. View looking west, from the Church of All Saints, along the Lowestoft Road.



Figure 32. Bench near the bus stop that is close to the main entrance to Worlingham Hall.

- 8.11 The country park, where it lies within the neighbourhood plan area, should attempt to capture (albeit over an extended period of tree and plant maturity²⁵) something of the rural character of the above scenes of the Lowestoft Road. This would help to visually tie the Worlingham portion of the Garden Neighbourhood to historical Worlingham.
- 8.12 The composition of the extensive, multi-functional country park (see paragraph 3.15 of the East Suffolk (Waveney) Local Plan) also remains to be established. It would be undesirable if associated facilities were to be of a nature and placement whereby users significantly disturbed the peace of settled residents. This factor should be taken into account in determining the facilities and layout of the country park.
- 8.13 A suitable mechanism for the management of the country park should be developed through close engagement with the local community and the parish council.
- 8.14 Masterplan development for the Beccles and Worlingham Garden Neighbourhood requires the applicants to undertake meaningful community engagement²⁶. This engagement will need to cover a number of matters. Where matters include the subject of landscaping, opportunities to compare and correlate feedback should be progressed. For example, it might be appropriate to combine community consultation concerning the country park (see Policy WORL13) with that for the comprehensive landscaping scheme (see Policy WORL12).

²⁵ Letter from Councillors in response to COP26 » East Suffolk Council

²⁶ Statement-of-Community-Involvement.pdf (eastsuffolk.gov.uk)

Policy WORL13: Country Park Landscaping and Management

A) Landscaping proposals for any part of the Beccles and Worlingham Garden Neighbourhood Country Park (which is required by Local Plan Policy WLP3.1) lying in the Worlingham Neighbourhood Plan area must reflect as far as possible the feedback from the local community as captured within this neighbourhood plan and as further sought and gathered from the community during the masterplandevelopment process. Such proposals should take as their starting point the planting of the native species of trees found along the Lowestoft Road through Worlingham and on the parkland associated with Worlingham Hall.

B) The layout of the above multi-functional country park must as far as possible take on the character of a landscaped open space (for walking, dog-walking, jogging, casual ball games and the encouragement of wildlife) as/if it approaches the existing housing to the north of the site in Worlingham.

Wildlife Corridors

- 8.15 86.7% (828 people) answered "Yes" to the question "Should new developments include wildlife corridors and habitat links to the wider countryside?"
- 8.16 The scale of the development required under East Suffolk (Waveney) Local Plan policy WLP3.1 will urbanise the countryside to the south of the built-up areas of Worlingham and Beccles, and, in effect, extend those areas. Mitigation of the impact upon wildlife could be achieved by "wildlife corridors", containing native vegetation, that traverse the site. This needs, however, to ensure through a biodiversity strategy supported by detailed fieldwork that such corridors would allow a wide range of species to thrive.
- 8.17 It is understood that the Suffolk Wildlife Trust, which is currently considering the area along the Beccles Southern Relief Road for a Roadside Nature Reserve, would be prepared to advise about such matters.
- 8.18 A resident systematically monitoring the fields in question has noted 75 species of bird since 2007. Many are "fly-overs", but many others have been sighted on the fields. The latter include barn owl, black-tailed godwit, common buzzard (regular in winter, feeding on worms), fieldfare and redwing (winter visitors), golden plover (regular winter visitor in high numbers), grey and red-legged partridge, hobby, kestrel, lapwing (possible breeding), linnet, marsh harrier (often in winter), meadow pipit, mistle thrush, linnet, oystercatcher, peregrine falcon (feeding on gull kill), ruff, skylark (breeding), snipe (winter), sparrowhawk, stock dove, whitethroat, and woodcock (winter). Foxes, hares (winter, often 6 or 8 at a time), muntjac deer, Chinese water deer and roe deer have also been seen. Bats are regular visitors over adjacent gardens in summer. (Monitoring of bat boxes on the footpath alongside the field is carried out by the Suffolk Bat Group (i.e. Suffolk Wildlife Trust).
- 8.19 Although not a native species, Pyracantha hedging (also known as Firethorn) is of great interest to wildlife. The dense evergreen foliage and thorny branches make a desirable

- habitat for birds and hedgehogs. Its bright swollen berries are a source of food for birds, whilst the white summer flowers attract bees and butterflies. It is suggested that it be considered as a potential bridging habitat between established residential gardens, where appropriate, and the native mixes required for the wildlife corridors.
- 8.20 The indicative outline Masterplan for the Beccles and Worlingham Garden Neighbourhood already indicates one possible such corridor running north-south along the parish boundary between the two settlements and exploiting a topographical feature of the terrain.
- 8.21 An east-west wildlife corridor, perhaps immediately south of the Bluebell Way estate and building upon the landscaping required under Policy WORL13, could provide a "connection" both to the farmland south of the Cedar Drive estate and to the important wooded area to the east of the latter housing estate. However, as noted above, this would need to be subject to more detailed assessment but would help the development to achieve net biodiversity gain, as required by the NPPF and the Environment Act 2021.
- 8.22 Depending upon the final arrangement of the Country Park (see Policy WORL13), the functions of the park and the proposed wildlife corridors might be able to strongly interact and support each other.
- 8.23 The ongoing maintenance of such corridors must be considered, especially where they are to also allow pedestrian and cycle movement. Possible concerns include vegetation overgrowth and "out-of-sight" illegal dumping of waste.

Policy WORL14: Wildlife Corridors

- A. Proposals that identify, protect and enhance wildlife corridors in the Worlingham Neighbourhood Plan area will be supported. These must be designed and implemented to maximise their wildlife value and provide connectivity through the site for terrestrial and aerial species. They must exploit suitable opportunities to link with the maintained and varied habitats provided by established residential gardens adjacent to the site. They must also be maintained as dark corridors as far as possible to increase their value for nocturnal species
- B. Development proposals for the part of the Beccles and Worlingham Garden Neighbourhood (described under Local Plan Policy WLP3.1) in the Worlingham Neighbourhood Plan area must demonstrate through a biodiversity strategy supported by field surveys that they have maximised the opportunity to protect and facilitate wildlife corridors that link the site with key wildlife features on or close to its boundary.

Local Green Spaces

- 8.24 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 102 of the NPPF says that Local Green Spaces should only be designated where the green space is:
 - in reasonably close proximity to the community is serves;
 - 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
 - local in character and not an extensive tract of land.
- 8.25 There are three satellite parks in Worlingham (All Saints Green, Woodfield Park and Werel's Loke). They all have the status of Open Spaces under the East Suffolk (Waveney) Local Plan policy WLP8.23.
- 8.26 From the "Waveney Green Infrastructure Strategy (2015)":- "Parks are well integrated into residential areas of Worlingham increasing their accessibility and value to the community. Shared-use paths through these open spaces provide good connectivity between residential areas and community facilities and improve surveillance. Together, these features are likely to encourage greater use of these open spaces..."; "All parks are of at least medium quality and medium value..."; "18% of households are within 400m of a small park and 11% within 1,000m of a large park..." and "Park provision in Worlingham is good and should be protected."
- 8.27 The sites that have been identified for designation as Local Green Spaces (see Appendix 5) are:
 - All Saint's Green;
 - Woodfield Park.
 - Werel's Loke Park
- 8.28 Each of the above is described and illustrated below. Their locations are shown on the Neighbourhood Plan Policy Map (see Section 11).

All Saints Green

This site is situated behind the grade II* listed Church of All Saints and is very much part of its setting. For many years it has served as the location for the annual Worlingham Village Fete (see photos below). It is partly overlooked by housing and has the rear of the church as its picturesque northern backdrop.

This area is part of the historical centre of the village, which grew initially around the nearby section of the Lowestoft Road.

The planned development of the Community Centre and new houses on the adjoining site that formerly belonged to a primary school is expected to add to the appeal of All Saints Green as a local amenity.



Figure 33. View of the Church of All Saints from All Saints Green.



Figure 34. Residents enjoying the village fete.

The Worlingham Village Fete takes place on the Green each September, making it a focal point for community activity.



Figure 35. Tug o' war competition at the fete on All Saints Green



Figure 36. Fundraising for charity at the village fete on All Saints Green.



Figure 37. Outdoor gym area at All Saints Green

Woodfield Park

This site is to the east of the wooded area between Woodland Avenue and Holly Close, which is identified in the Beccles Biodiversity Audit for protection of the wildlife and green corridors.

The park provides relief for the woodland from otherwise complete urbanisation of its surroundings.

Although the park suffers from drainage issues, it is highly valued by the local community. It provides a scenic backdrop to the play space, a picnic area, and avoids the impression of overdevelopment. It is part of the foot and cycle route to the primary school from Cedar Drive, Rowan Way, Sycamore Close and Holly Close.



Figure 38. View of Woodfield Park



Figure 39. Path through Woodfield Park

Werel's Loke Park

This park is located on the highest point in the village at the south-east corner of the settlement boundary. It directly serves the community living on the Werel's Loke estate, which is the most recently developed part of the village. It includes both a play area for young children and a multi-use games area for sports activities.

The park is surrounded by wildlife habitats. Development of the neighbouring estate required the movement of a population of Great Crested Newts (a species listed as a European Protected Species under Annex IV of the European Habitats Directive and protected under the Wildlife and Countryside Act (1981)) and the installation of a newt net to provide separation from the housing.

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Figure 40. A view of Werel's Loke Park.



Figure 41. Play area at Werel's Loke Park

Figure 42. Another view of Werel's Loke Park



Figure 43. Games area at Werel's Loke Park

Policy WORL15: Protection of Local Green Spaces

- A. The following sites, as identified on the Worlingham Neighbourhood Plan Policies Map and in Appendix 5, are designated as Local Green Spaces:
 - a. All Saints Green
 - b. Woodfield Park
 - c. Werel's Loke Park
- B. Proposals for built development on any of these Local Green Spaces will only be permitted in very special circumstances.

9. DRAINAGE

- 9.1 Parts of Worlingham have a history of rainwater drainage problems (e.g. at Woodfield Park and the play area in Park Drive). This arises from the combination of a clay substructure with the topography.
- 9.2 With particular reference to the development of the Beccles and Worlingham Garden Neighbourhood (under Local Plan Policy WLP3.1), there is concern among residents that rainwater runoff northwards towards Bluebell Way may be exacerbated. This matter is important not only to the potentially affected residents but also for routine access to the facilities of the site from the north.



Figure 44. Rainwater running down the slope towards the Bluebell Way estate.

9.3 The matter of drainage/flooding is covered by the NPPF (paragraphs 159 to 169). National planning policy requires planning applications to ensure that flood risk is not increased elsewhere and priority is given to the use of SuDS. In addition, East Suffolk (Waveney) Local Plan Policy WLP8.24 (Flood Risk) requires SuDS systems to be integrated into the landscaping system and the green infrastructure provision of the development, and not detract from the design quality of the scheme. The best way of achieving attractive SuDS provision is to design it with a focus on ensuring it provides a rich habitat for wildlife, plants and other species. This will in turn assist the development in achieving the requirement for net biodiversity gain. The Broads Authority Local Plan policy SP2 (Strategic flood risk) requires incorporation of appropriate surface water drainage mitigation measures and the implementation of SuDS principles to minimise the new development's own risk of flooding and not materially increase the flood risk to other areas.



Figure 45. An example of creative SuDS provision that maximises biodiversity.

Policy WORL16: Drainage

- A. Sustainable Drainage Systems (SuDS) within Worlingham must be designed to enhance wildlife and biodiversity and must use a wide range of creative solutions appropriate to the site, such as providing SuDS as part of green spaces, green roofs, permeable surfaces and rain gardens.
- B. Development Proposals for the Beccles and Worlingham Garden Neighbourhood (described under Local Plan Policy WLP3.1) within Worlingham must make it clear how the issue of water runoff towards the northern boundary of the Beccles and Worlingham Garden Neighbourhood in Worlingham will not be exacerbated.

10 NON-POLICY ACTION AREAS

There are a number of matters requiring action that link to the Vision and Objectives which are either not planning policy matters or within the scope of neighbourhood planning. However, they are still important issues that require action.

1. Delivery of Affordable Housing (including sheltered housing)

This sensitive area is complex and subject to evolving national policy development concerning the forms of provision and tenure.

It is not the intention of the Neighbourhood Plan to attempt to set policies in this area, but rather to work with East Suffolk Council in better identifying the level and nature of the need and the implications upon housing delivery.

2. Green Space between Worlingham and Beccles

A recommendation of "Waveney Green Infrastructure Strategy 2015; Beccles and Worlingham Area" is that the open countryside to the north of the Lowestoft Road, located between Marsh View (in Beccles) and Park Drive (in Worlingham) should be considered for protection as an open break as part of a future review of the Local Plan.

Whilst the land concerned is entirely in Beccles parish, it is part of the setting of both communities as one passes along the connecting main road. A key objective of this neighbourhood plan is to maintain the distinctive identity of Worlingham and, therefore, it would support protection of the above area of countryside against development.

3. The phasing of housing development

The intentions of the Neighbourhood Plan to deliver balanced housing according to the Vision and Objectives would be negated by a rush to build. The concern is that the financial goals of the developer(s) and the housing targets and policy constraints (e.g. the management of a 5-year land supply) of the District Council may override the primary aim of the Neighbourhood Plan to achieve sustainable development for the evolving community it serves.

There seems little that the Neighbourhood Plan can do in this area beyond monitoring and providing a timely commentary drawing attention to these matters as/if they arise.

4. Facility provision

a) Health

The community has very strong concerns about the future provision of medical services, particularly in the context of both an ageing and growing population.

The Parish Council is in regular communication with the Beccles Medical Centre and would look favourably upon a proposal for a satellite Medical Centre in Worlingham.

b) Retail

The Neighbourhood Plan recommends that any future proposals relating to retail provision be carefully assessed by the Parish Council against the services currently available. In the context of a village community, particularly one with an ageing population, the breadth of the local retail offering would seem more important than the advantages from competition.

c) Sports and play (see also Policy WORL7 in section 6)

The Worlingham and Beccles communities must be involved in the determination of the design requirements for the range of sports, play and recreational facilities to be provided on the Beccles and Worlingham Garden Neighbourhood development.

Suitable engagement forums, management vehicles and ongoing funding arrangements must be agreed by the Parish Council with relevant stakeholders.

d) Education

There will be a new 2 form entry primary school including a pre-school on the Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1).

The outline masterplan shows these as being within the Worlingham section of the development. It is recommended that the Parish Council considers the implications.

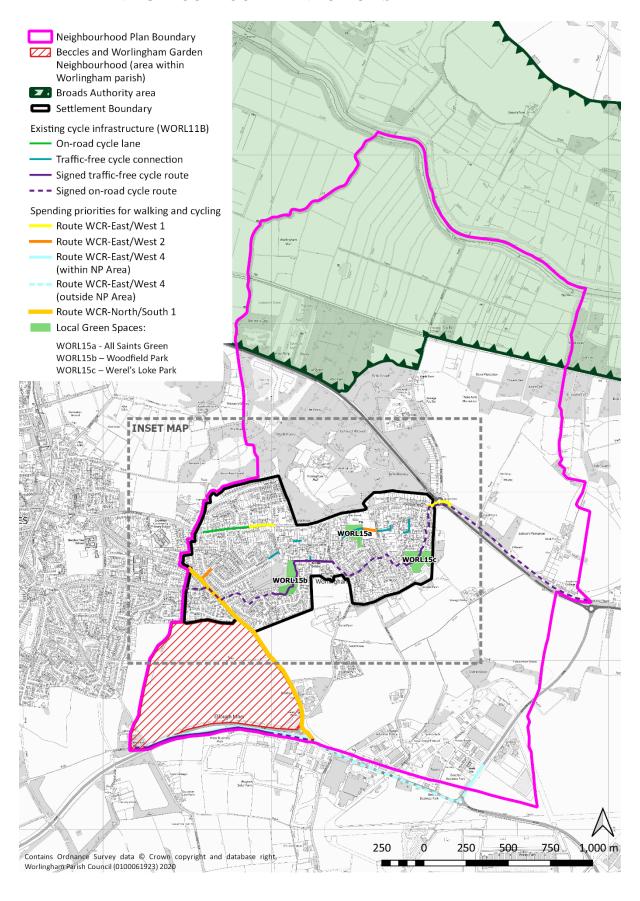
e) Arts/Crafts and Culture

It is recommended that the Parish Council identify and progress opportunities to promote the new Community Centre(s) as a venue (as venues) for arts, crafts and culture.

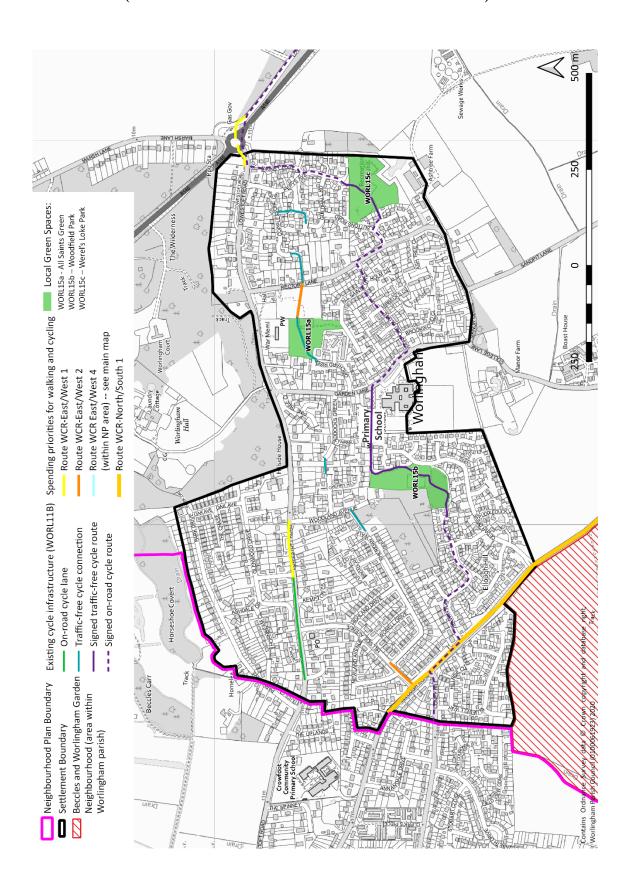
5. Transport and Movement

- a) Completion of the Southern Relief Road, in principle, opens the possibility for introducing a vehicle weight limit on the key movement route along the Lowestoft Road through the village. The implications of such a weight limit will be explored in consultation with Beccles Town Council and with Suffolk Highways.
- b) As the populations of Worlingham and Beccles increases in line with the Local Plan, demands on the local road system will also increase. A particular concern is the junction of Lowestoft Road and Ellough Road at peak hours, and the movement eastwards along the Lowestoft Road into Beccles. It is recommended that the Parish Council keeps this matter under review, in association with Beccles Town Council.

11 NEIGHBOURHOOD PLAN POLICIES MAP



INSET MAP (FOR NEIGHBOURHOOD PLAN POLICIES MAP)



12. GLOSSARY

Affordable Housing – Social rented, affordable rented, and intermediate housing (see below), provided to eligible households whose needs are not met by the market. Subsidised ownership schemes such as Starter Homes (see below) also come under this category.

Market Housing – this term is used here to denote all dwellings (freehold, leasehold and private rent) purchased or rented from the open housing market without any subsidies or discounts derived from Government policies.

Local Plan – the planning policy document produced by East Suffolk Council, covering Worlingham Parish. This addresses a full range of strategic and 'development management' planning matters. The Worlingham Neighbourhood Plan, as required by the National Planning Policy Framework, must be in general conformity with the strategic policies in the East Suffolk (Waveney) Local Plan 2019.

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.

National Planning Policy Framework – the national planning policy document which sets out the Government's planning policies for England and how these are expected to be applied.

Sheltered Housing – a group of flats or bungalows where all residents are older people (usually over 55). With a few exceptions, all developments provide independent, self-contained homes with their own front doors. There are usually some common facilities that all residents can use – such as a residents' lounge, a garden, a guest suite, and often a laundry.

Output Areas – a unit of area for which statistical data (including for the UK Census) is collected.

Housing Needs Assessment – a study applying the methodology intended for "Strategic Housing Market Assessments" (see below), but in a way that is proportionate for neighbourhood planning.

Strategic Housing Market Assessment – a study undertaken at "Housing Market Area" level (often at District level) to assess the quantity of housing required in the period to be covered by a Local Plan. It uses household growth projections derived from population projections, and adjusts these according to a range of demographic, market and economic trends and indicators (including outputs from models of the effects of differing industrial policies). It also considers the nature of the housing required.

Appendix 1 Housing Mix from the Strategic Housing Market Assessment.

This appendix summarises the housing growth and housing mix requirements for Waveney over the period 2014 to 2036.

Chapter 4 of the Waveney 2017 SHMA (volume 2) projects from the objectively assessed need (OAN) data the profile of new home types required for the district over the period 2014-2036 according to home size and to the type of tenure. These projections have been extracted and collated for tabulation here as below. (Note: The projections show the numbers of discount home ownership/Starter Homes that would be potentially required should this product become available to house some households that would otherwise reside in the private rented sector.)

Table A1.

SHMA projections of the types of new homes required for Waveney (2014 to 2036)

Size of	Numbers	% new	Owned	"Starter	Private	Shared	Social
new	of new	dwellings	with or	Homes"	Rent	Ownership	Rent
homes	homes	based on	without	(i.e.		_	
	based on	size of	mortgage	discounted)			
	size	home		ŕ			
1	990	12.9%	483	78	47	103	279
bedroom							
2	2,088	27.2%	1,303	141	218	156	270
bedroom							
3	2,638	34.4%	1,633	174	286	162	383
bedroom							
4 or	1,946	25.4%	1,280	60	166	57	383
more							
bedroom							
Totals	7,660	100%	4,697	454	716	478	1,315
% new							
dwellings							
according			61.3%	5.9%	9.3%	6.2%	17.2%
to tenure							
type							

However, the above 7,660 new dwellings over the twenty-two year period 2014 to 2036 have to be adjusted to account for the district's vacancy rate of 6.86 per cent. This increases the required new dwellings to 8,223. (Note: the vacancy rate in Worlingham is only around 2.4%. One factor is that in comparison with the coastal settlements there is less market distortion because of holiday-home ownership).

Chapter 7 of the Waveney 2017 SHMA (volume 2) discusses recent policy moves concerning the nature of affordable housing and suggests the tenure profile should be 67% market housing (combining the owner occupied and private rented tenures), 17.3% affordable rent, and 15.7% affordable home ownership (of which 8.9% could be Shared Ownership and 6.8% be Starter Homes). It also graphically displays in its Figure (7.5) the adjusted numbers of homes required according to tenure type and size. Unfortunately, the data shown in that figure is not also provided in tabular form, but in general **ratio terms** the breakdowns according to dwelling size

seem to mirror closely those in the data tabulated here in Table A1 above. And it is this ratio of housing sizes required for new housing in the former Waveney area that is of most relevance to the policy adjustments required by this neighbourhood plan.

For completeness concerning the background to the East Suffolk (Waveney) Local Plan's homebuilding targets, the planning authority has made a further allocation of 12.3%, lifting the required 8,223 dwellings (see above) to 9,235 to help enable more affordable homes to be delivered and provide confidence that the objectively assessed need target (of 8,223 dwellings) will be met within the plan period.

Appendix 2 Overview of existing housing "character areas" in Worlingham.

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detached back with on-road. All Saints		wall". Lead					
houses. verges. Rear Garages Green. Jur		All Saints Green. Jun					
gardens. common. school.	u11101				1104565.		
7. Werel's Loke Branching Mainly detached Pavement on Predominantly Park and s	l sports	Park and s	Predominantly			Branching	7. Werel's Loke
estate arrangement. houses and main estate within curtilage. area.		area.				arrangement.	estate
bungalows. road, but not on Garages all branch common.			-	,	oungalows.		
roads.			common.				
Frontages either							
gardens or set							
back with verge. Rear gardens.							
8. Marsh Lane Linear Detached and Grass verge. Within Scenic view	ew of	Scenic view		Grass verge.		Linear	8. Marsh Lane
semi-detached Front and rear curtilage. open	:a.		-				
houses. gardens. Garages countrysid sungalows.	ide.	countrysid	-	gardens.			

Character area 1: Park Drive area





Character area 2: Lowestoft Road





Character area 3: Hillside Avenue area





Character area 4: Bluebell Way estate





Character area 5: Cedar Drive estate





Character area 6: Garden Lane area





Character area 7: Werel's Loke estate



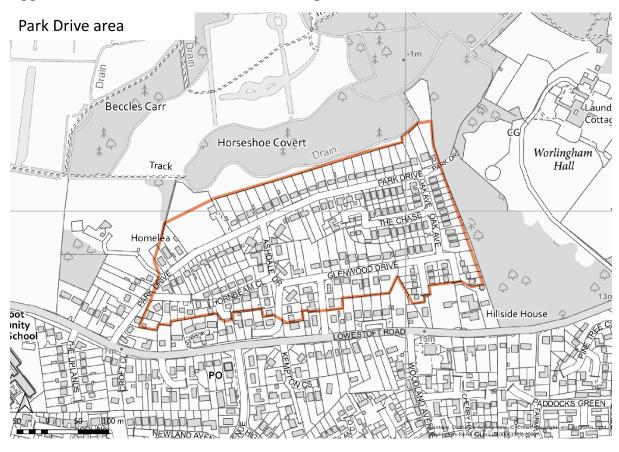


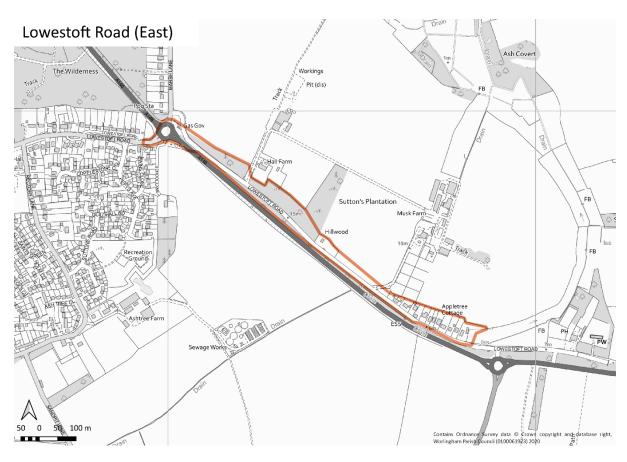
Character area 8: Marsh Lane

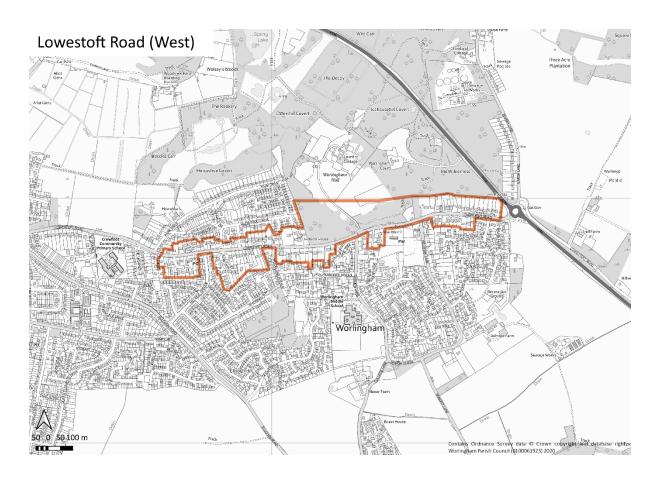


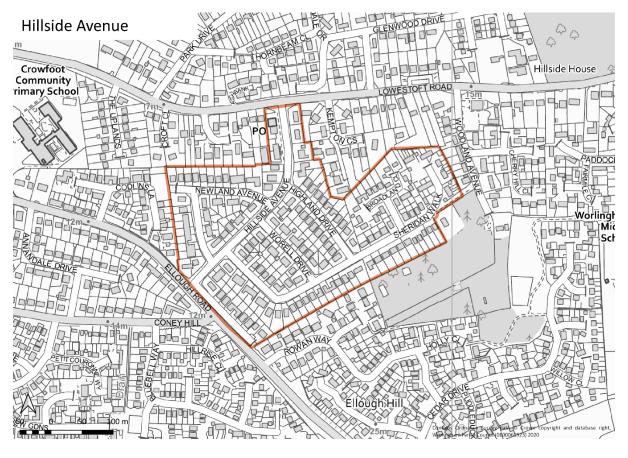


Appendix 3 Individual Character Area maps







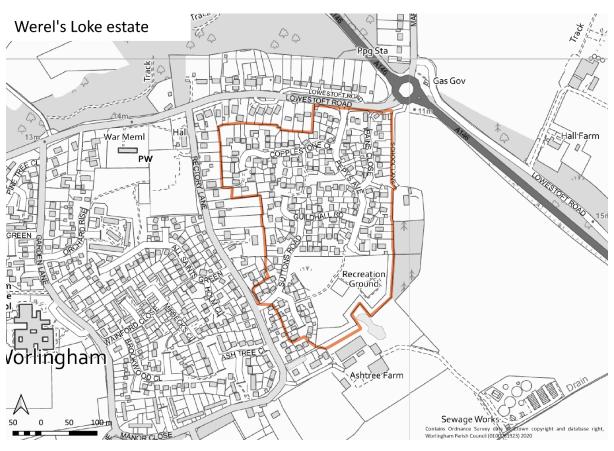


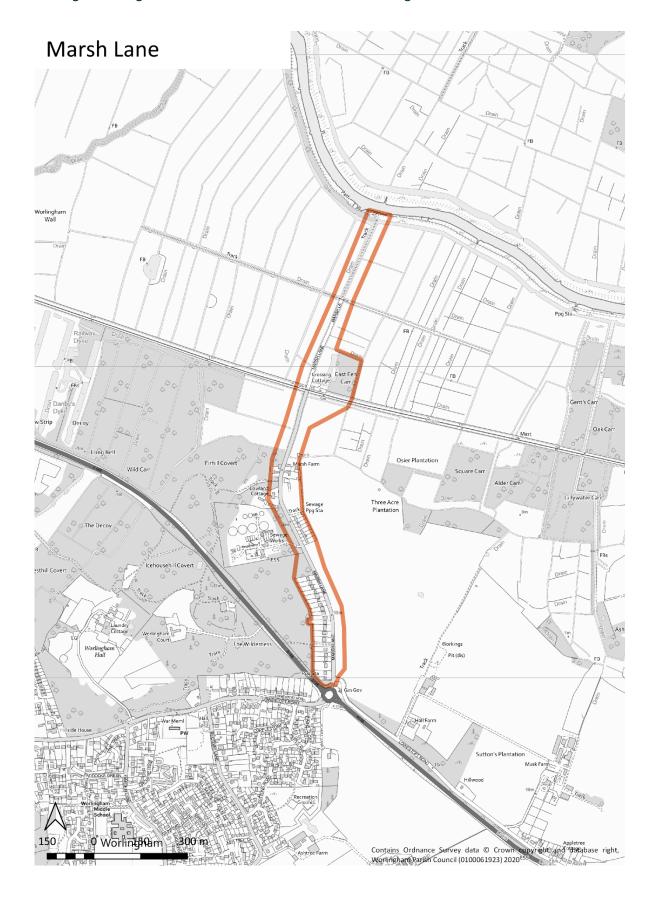




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Appendix 4. Supporting evidence and analysis for Parking Policy WORL8

Table 1. Comparison of car access per household derived from 2011 Census data.

Region	Car access per household
Worlingham	1.5
Waveney	1.2
East of England	1.3
England	1.2

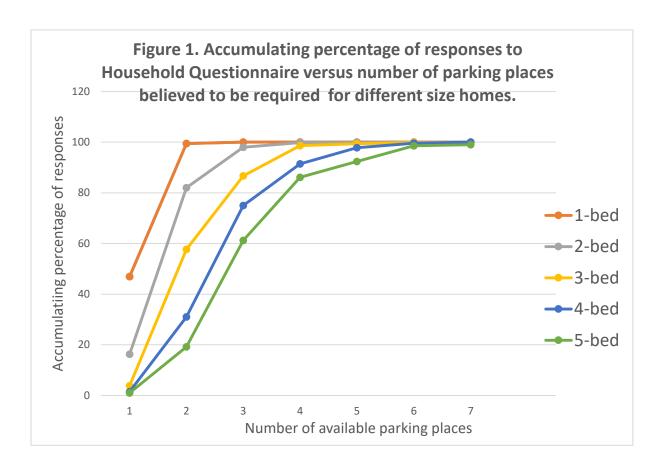


Table 2. Car ownership in Worlingham (2011 Census)

Number of cars/vans per	Number of Households	Percentage of Households
household.		(%)
0	150	9.5
1	693	44.1
2	549	34.9
3	141	9.0
4+	38	2.4

Table 3: Comparison of the requirements of Policy WORL8 with the minimum Suffolk standards.

Size of home	Minimum Suffolk standards Parking places per dwelling	Policy WORL8 Parking places per dwelling
1-bed	1	1.5
2-bed	2	2
3-bed	2	2
4-bed	3	3
5-bed+	3	4

Calculations of required parking places as function of housing mix.

The following table considers four example home-size mixes. Mixes A and B are example mixes that are compatible with the findings of the SHMA as tabulated in Appendix 1. (*Note: The Waveney SHMA treats 4- and 5-bedroom homes as 4+ bedroom*). Mixes C and D are example mixes as modified from the SHMA recommendations by the recommendations of the Worlingham HNA (see Neighbourhood Plan Policy WORL2).

Table 4. Example Home-Size Mixes.

Size of home	Waveney SHMA	Waveney SHMA	Policy WORL2	Policy WORL2
	A	В	С	D
1-bed	12.9%	12.9%	12.9%	12.9%
2-bed	27.2%	27.2%	27.2%	27.2%
3-bed	34.4%	34.4%	42%	50%
4-bed	20.4%	22%	15.9%	7.9%
5-bed	5%	3.4%	2%	2%

Table 5. Parking places per dwelling, <u>excluding visitor parking</u>, based on the example Housing Mixes in Table 4.

Housing Mix	Suffolk Min.	Policy WORL8	% Difference in
Model	Standards***	Standards.	number of parking
	Parking places per	Parking places per	places per dwelling.
	dwelling	dwelling	
A	2.13	2.24	5.16
В	2.13	2.22	4.23
C	2.05	2.13	3.90
D	1.97	2.05	4.06

Table 6. Parking places per dwelling, <u>including visitor parking</u>, based on the example Housing Mixes in Table 4.

Housing Mix	Suffolk Min.	Policy WORL8	% Difference in
Model	Standards***	Standards	number of parking
	Parking places per	Parking places per	places per dwelling.
	dwelling	dwelling	
A	2.38	2.49	4.62
В	2.38	2.47	3.78
C	2.30	2.38	3.48
D	2.22	2.3	3.60

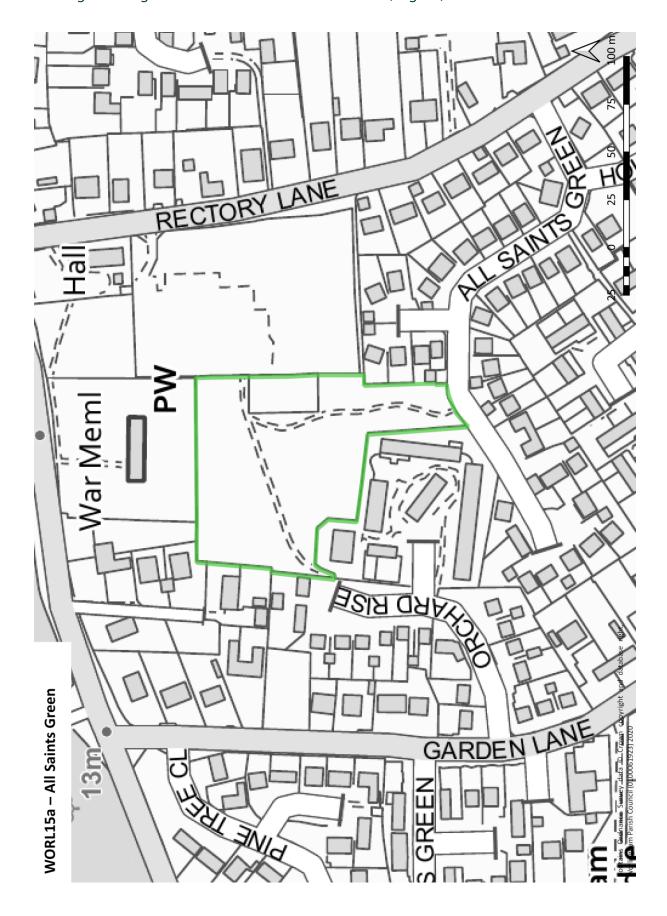
Conclusions:

- i) Although car access is 25% higher for Worlingham compared to that for the former district of Waveney (see Table 1), adoption of the parking requirements of Policy WORL8 would involve "only" about 3.6 to 4.6% (see Table 6, which includes visitor parking) more parking places relative to the Suffolk minimum standards for the example housing mixes (of Table 4) that are compatible with either the Waveney SHMA or with Policy WORL2.
- ii) The combination of policies WORL2 (Housing Mix) and WORL8 (Parking Standards) lead to an average of around 2.1 (or 2.35, including visitors' parking provision) parking places per dwelling, whereas the combination of the SHMA-derived example housing mixes and the Suffolk minimum standards leads to a figure of about 2.13 (or 2.38, including visitors' parking provision) parking places per dwelling. The similarity in parking space requirements for the different housing-mix/parking space combinations is explained by the greater emphasis on the projected need for new 3-bed dwellings (and fewer new 4-bed and 5-bed dwellings) required by Policy WORL2. Further reductions in the number of large homes in the mix would lead to still further reductions in the average number of parking places per dwelling.
- iii) Similarly, variations on the above considered example house-size mixes having more 2-bed dwellings and fewer 1-bed dwellings (whilst maintaining the total percentage from both at about 40% of each mix) would lead to slight increases in all cases for the average number of parking places per dwelling. However, in such mixes, the relative impact of Policy WORL8 (i.e. relative to the application of the Suffolk minimum parking standards) will diminish still further.
- iv) Figure 1 shows the feedback from the Household Questionnaire. The parking standards of Policy WORL8 can to a degree be reassuringly viewed against the interpolated "75% satisfaction level" associated with each dwelling size. Whilst this feedback suggests parking provision should also be raised for 3-bed dwellings, this has not been implemented in Policy WORL8 because of the increasing dominance of this dwelling size, i.e. the imposition of a higher ("fractional") parking space provision for the major 3-bed category would complicate housing scheme design and undermine the delivery of Policy WORL2, which promotes this dwelling size. Instead, the adjusted parking standards have been restricted to only the smallest and largest dwelling sizes, for which it is thought that such changes can offer the most benefits

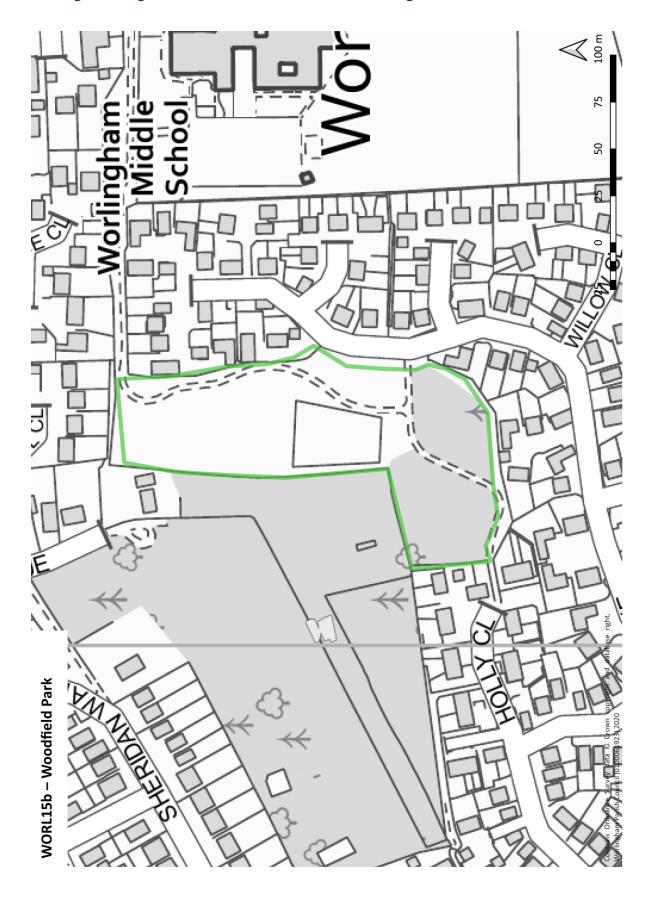
to the sustainability of the new housing developments by, for example, meeting the needs of commuting working couples in 1-bed homes and by attempting to address the high vehicle ownership of a small number of large households, which would otherwise be formally unmet (see Table 2).

Appendix 5. Local Green Spaces

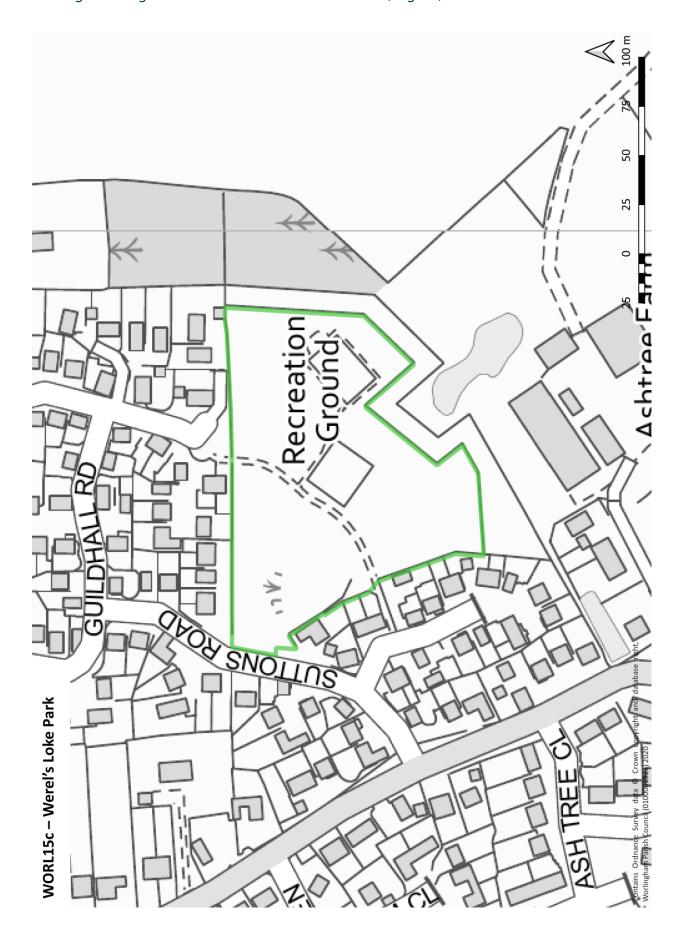












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