

Opinions expressed on the ‘Sustainability Appraisal Report of the Waveney Local Plan’ (March 2018)

The table below contains the opinions expressed in relation to the Sustainability Appraisal Report of the Waveney Local Plan (March 2018) (the SA) which were made during the consultation period 29th March to 24th May 2018. The comments are not summarised and show the text as submitted by the respondent, but parts of the representation that do not relate to opinions on the SA are not included.

Comment	Organisation/individual
<p>Significant Effects of the Final Draft Plan - In general, we agree with the scoring of Sustainability Objectives 9, 11 and 12 but we only wish to comment where policies and proposals may affect designated sites, protected landscapes, Best and Most Versatile agricultural land (categorised as grades 1, 2 and 3a land within the Agricultural Land Classification (ALC) system).</p> <p>We note that Objective 9 - to conserve and enhance the quality and distinctiveness of landscapes and townscapes is considered positive overall, Objective 11 - to conserve natural resources (due to allocations on greenfield sites which use grade 2 agricultural land) is considered to be significant negative overall and Objective 12 - to conserve and enhance biodiversity and geodiversity is positive overall. We agree that there is no way of fully mitigating the loss of BMV land where allocated although the use of lower value agricultural land should be prioritised for development.</p> <p>Proposals for Monitoring – We agree with the indicators to monitor the objective To conserve natural resources.</p> <p>Appendix D – Scoping Report Consultation – We are pleased to see changes made in response to our previous advice.</p> <p>Appendix E – Appraisal of Policies and Proposals in Final Draft Plan We note the following policies have been considered ‘unknown’ or ‘negative’ for effects on designated sites: Policy WLP1.1 - Scale and Location of Growth Policy WLP2.16 – Land South of The Street, Carlton Colville and ‘negative’ for effects on protected landscapes: Policy WLP1.1 - Scale and Location of Growth</p>	<p>Natural England</p>

<p>Policy WLP6.1 - Land west of Copperwheat Avenue, Reydon Policy WLP7.1 – Rural Settlement Hierarchy and Housing Growth Policy WLP7.7 – Land north of Elms Lane, Wangford Policy WLP7.13– Land north of Chapel Road, Mutford Detailed survey and impact assessments for these allocations will be required at application stage to ensure that any adverse effects can be fully mitigated.</p> <p>We have not considered Appendix F – Appraisal of alternative options.</p>	
<p>Reference to flood risk in the Sustainability Appraisal is challenged as this does not refer to fluvial flood risk but surface water flood risk which can be addressed through the development of the site. The Environment Agency’s Flood Risk mapping plan is attached at Appendix 3, it clearly shows the site lies within Flood Zone 1 in which all types of development are appropriate.</p>	<p>Halsbury Homes Ltd (Pegasus Group) (Rep ID: 808)</p>
<p>The ‘Draft Sustainability Appraisal’ of Waveney Final Draft Local Plan is used in this document to clearly underscore discrepancies between Waveney Sustainability Objectives and Policy WLP4.2.</p> <p>Each of the following relevant sections of the Appraisal highlights the Sustainability Objective followed by the Decision making Criteria for Site Allocations. This is then followed by how Policy WLP4.2 fails to meet those objectives and criteria.</p> <p>Section 1: Sustainability Objective: “To improve the health and well-being of the population” Criteria for Site Allocations: “Are public open space, key services and employment opportunities accessible by foot or by cycle from the allocation option?”</p> <p>The answer to this question is “no”. The pedestrian route along Chediston Street is highly problematic, with very narrow pavements that are non-existent in places; regular parking on the pavements; no cycle path into town (Chediston Street is one-way going out of town); the train station is a kilometre away; the Doctor’s surgery is a further 300 metres beyond the station; the primary school is located on the other side of the town as are the large employment areas which are even further away.</p> <p>Section 8:</p>	<p>Charlotte Slater (Rep ID: 479)</p>

Sustainability Objective: "To maintain and improve water quality"

Criteria for Site Allocations: "Could the allocation option result in run-off of pollutants to nearby water courses that lead to a deterioration in its existing status and/or fail to achieve the objective of good status under the Water Framework Directive?"

The site WLP4.2 has buried beneath it a historical Town dump that was used extensively for animal waste etc from the slaughterhouses in the town. This has not been checked by the Environment Agency and it may, if disturbed through development, "result in run-off of pollutants to nearby water courses".

Section 9:

Sustainability Objective: "To conserve and enhance the quality and distinctiveness of landscapes and townscapes".

(i) Criteria for Site Allocations: "Is the allocation option within tributary valley farmland or rural river valleys character areas and/or could materially harm the character areas?"

The land in Policy WLP4.2 is directly in tributary valley farmland, and is highly prominent in the landscape. It is visible from the B1123 from Chediston, Roman Way, historic Chediston Street, Newby Close, Dukes Drive, Allington Road, Clay Hills, Dakings Drift and Barley Meadow. It has not been mentioned, or indeed quantified, just how high this land is at its highest point. This is a vital fact that has been missing in ALL documents and assessments relating to this site. Desk-based assessments of its suitability for development, by planners unfamiliar with the site, have not taken account of this.

(ii) Criteria for Site Allocations: "Will the allocation option lead to a loss of or harm important local landscape features? Will the allocation option harm the townscape and/or setting of the settlement?"

The character of the tributary valley farmland will be lost completely, and the clearly defined natural town boundary will also be lost to house building into the countryside, otherwise known as 'urban sprawl'. The significant height of the land (approximately 10 meters above Roman Way road level) and sloping aspect down towards the tributary valley defines Halesworth from the road (B1123) in from the West of Suffolk. This land signifies both the start and end of Halesworth for local people, tourists and other road users.

Alternative sites do not have any of these negative issues, for example: site 122 (West of Norwich Road in the north of the town) does not share these issues at all, despite what final draft Local Plan would have you believe. Site 122 would be an “in-fill development” as it is bordered by development on 3 sides already and bordered on a fourth by a railway line. This simply cannot be compared to building on a high piece of land, visible from so many directions beyond the natural town boundary that is only bordered on 2 sides. I strongly refute the claim on the District Council’s ‘Alternative Sites Considered’, information that states: “site 122 is located in an area of high landscape value.” It is overgrown and bordered on all sides, and flat land.

This issue could easily be resolved by a site visit and an honest independent appraisal of the land by an official from the Secretary of State for the Ministry of Housing, Communities and Local Government. This would almost certainly highlight WLP4.2 as the site of significantly greater visible character and distinctiveness and that it is a landscape worth protecting for Halesworth and the surrounding area. This goes to emphasise yet again how this site is not sustainable when measured against Waveney’s own objectives of sustainability.

Section 10:

Sustainability Objective: “To reduce contributions to climate change and mitigate the effects”

Criteria for Site Allocations: “Is the allocation option within a tidal or fluvial flood zone or at risk from surface water flooding within the next 100 years?”

This is a large scale development adjacent to designated flood zones 2 and 3, directly impacting Chediston Street homes, School Lane and the Thoroughfare in the Town Centre, which already flood at times of high rainfall. These are consistently categorised as high flood risk areas in the town by the Environment Agency. The Waveney strategic Flood Risk assessment (9.3.19) states “Halesworth is at risk of flooding from the River Blyth. High property densities situated on both sides of the river, which runs through the centre of the Town and the presence of two confluences, one to the west and one to the south west of the town exacerbates flooding situations.” Additional property development adjacent to this watercourse must further “exacerbate flooding situations”. The site does not meet sustainable criteria or objectives set

out by Waveney District Council.

Section 11:

Sustainability Objective: "To conserve natural resources"

Criteria for Site Allocations: "Is the allocation option on greenfield land?" "Is the allocation option on grade 1, grade 2 or grade 3a agricultural land?"

Policy site WLP4.2 is categorised as having land predominantly of agricultural grade 2, whereas alternative sites have land of poorer agricultural grade, 3. Alternative sites should have been prioritised instead of this site, but have not. Site 122 (the Hopkins Homes owned site, land West of Norwich Road) has an agricultural grading of 3, making it more suitable to be prioritised for development over the policy site WLP4.2, and is a better use of poorer quality agricultural land. WLP4.2 thus fails to protect the best and most versatile agricultural land and so the decision to assign it preferred site status has again been demonstrated to be flawed in light of District Council objectives for sustainability.

Section 12:

Sustainability Objective: "To conserve and enhance biodiversity and geodiversity"

Criteria for Site Allocations: "Will the allocation result in disturbance or damage to any protected species or their habitats?"

The answer is YES, allocation of WLP4.2 WILL result in disturbance and loss of protected species as identified by the Suffolk Wildlife Trust (SWT, November 2017) consultation. They revealed a number of priority species were found to be present, on the site, namely grey partridge, the linnet and brown hare. The linnet is on the RSPB's 'red' species list of conservation importance and is protected under the Wildlife and Countryside Act 1981. The SWT report objected to planning permission submitted requesting permission to build 200 homes on 5.1 hectares of the site (complete site is 9.1 hectares). They responded with the following paragraph from their consultation document:

"The proposed development would result in the loss of a greenfield site, which the ecological consultant (of the Developer with a planning application on WLP4.2) has judged of 'low' value for wildlife. However, the site is of value for a range of species including the UK Priority species

(under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) grey partridge, linnet and brown hare which were all recorded on site during the ecological survey. It is unlikely that mitigation measures included as part of any development would be suitable for retaining these species on site and therefore development in this location would result in a net loss of habitat suitable for these species in this area”

Section 13:

Sustainability Objective: “To conserve and enhance the historic environment”

Criteria for Site Allocations: “Will the allocation option affect known or potential archaeological sites?”

The answer is a very clear YES. The Archaeological Service, in their October 2017 consultation document stated that: “this site lies in an area of high archaeological potential recorded on County Historic Environment record. Within the proposed development site a scatter of Roman material was recorded, with further historic Roman pottery identified to the South of the development. There is high potential for (prehistoric, Roman & Saxon finds) to continue in the proposed development area.”

Section 17:

Sustainability Objective: “To encourage efficient patterns of movement in support of economic growth”

Criteria for Site Allocations: “Are employment opportunities accessible by foot or by cycle from the allocation option (residential sites and vice versa for employment sites)? Is the allocation option for employment use or town centre use and can it be accessed by public transport and/or other sustainable modes?”

Policy WLP4.2 will increase average commuting distance as the main employment areas are located beyond the Thoroughfare (which would only employ low paid staff, for tourism and retail employment). The proposed health and sports facilities on the Campus Site, the New Cut Arts Centre and education facilities are all located on the other side of the town, i.e. not easily accessible on foot or cycle from WLP4.2. This will, as a consequence, result in more car journeys going through the town, rather than walking or cycling (as Chediston Street is a very narrow, one way street). The use of local buses will not be likely if the

<p>bus stop is a 500 metre walk from the proposed site entrance.</p> <p>By comparison, site 122 has a number of positives in this regard. Employment areas are easily accessible by foot or cycle to the industrial estates and to the railway station for employment further afield. All journeys are minimal, with the site being on the same side of town for both leisure and education facilities which are situated within easy walking distance. The bus stop is nearby site 122, on the main Norwich Road.</p> <p>Conclusion: Policy WLP 4.2 fails to meet a number of the Policy Objectives in the Sustainability Report. It also does not fulfil many of the Criteria for making decisions on site allocations and so cannot be seen to be POSITIVELY PREPARED. On this basis it must be regarded as 'unsustainable' and its inclusion in the Local Plan to be taken as 'unsound.'</p>	
<p>We believe, when tested against the Council's own Sustainability Appraisal Report (March 2018) our proposed site outcores the selected site (ie: meets more of its objectives).</p>	<p>Mr & Mrs R J Miller (Rep ID: 775)</p>
<p>The Sustainability Appraisal of Waveney Local Plan, March 2018, provides only some additional information:</p> <p>"There is insufficient capacity at Reydon primary school to serve this development and expansion of the primary school is not feasible. This site is less well related to the village and would have a greater impact on the AONB compared to the preferred site."</p> <p>According to the published consultation responses to the First Draft Local Plan, there were no objections from the statutory consultees.</p> <p>Turning to the last stated issue in the Sustainability Appraisal, the landscape impact, this is contrary to the Local Planning Authority's reasoning for proposing the allocation in the 2017 First Draft Local Plan:</p> <p>"There are limited development opportunities in the village because of the sensitive landscape. This site is considered to have a relatively small impact on the landscape compared to other possible sites for development around the village and provides an opportunity to improve the existing settlement edge in this location." (para 7.71)</p> <p>" The land has a gentle slope from north to south and is contained</p>	<p>Bellingham Homes Ltd (Wheatman Planning) (Rep ID: 525)</p>

<p>within the wider landscape by its location in a shallow valley and existing trees located along the ridge-lines. Established hedgerows and trees are located along the north of the site and the road frontage which should be protected and reinforced to retain the character of the area, provide screening and enhance habitat for biodiversity” (para 7.72)</p> <p>“... allow a developer to design a quality development that includes a generous amount of landscaping to provide a sense of openness and complements the setting of the site in the Area of Outstanding Natural Beauty and open countryside” (para 7.44)</p> <p>Clearly, the above extracts from the First Draft Local Plan substantiate the Council’s reasoning for including the allocation at that time, based on an assessment of the landscape and provides a commentary on the comparative assessment with the other sites around the village.</p>	
<p>We question the soundness of the Sustainability Appraisal Report and the Strategic Housing and Economic Land Availability Assessment. The assessment shows no issues/impacts in relation to Utilities, Services, Flood Risk (WLP8.24) or Transport (WLP8.21). However the Sustainability Appraisal Report shows these as negative. The only positives being ‘Meeting Housing Needs’ and ‘Uncertain Effect on Health and Wellbeing’ (if ‘uncertain’ how can this be a positive?). It seems the negatives have been ignored.</p>	<p>Rumburgh Parish Council (Rep ID: 419)</p>
<p>We note that the SA has assessed various options for growth within the District, however within section 6 of the SA – Appraisal of Options, paragraph 6.2 onwards, it does not clearly set out exactly what the preferred option offers. It does however set out what the alternative options are. This section does not clearly set out what the full range of ‘reasonable alternatives’ the Council has considered, as required by regulation and guidance. There is no detail within appendix E of the SA of the preferred option.</p> <p>The Council’s comments with regards to Alternative Option 2, specifically the ability for Beccles to support higher levels of growth and that it would be challenging are not supported by evidence. Given the significant failure of housing needs not being met for a long period of time across the District, clearly demonstrates that the Council’s previous strategies were considerably challenging. Therefore, an option, which maximises stronger housing markets within the District should be fully considered. We do not consider an option which distributes 25% of housing growth to Beccles places a greater level of risk to the delivery of</p>	<p>Larkfleet Homes (Strategic Planning Research Unit – DLP Planning) (Rep ID: 928, attachment ‘Report A’)</p>

housing needs. As we can demonstrate in these representations Beccles is an attractive market to housebuilders and there is no reason to consider the risk to housing delivery would be greater. Therefore, a strategy which maximises development opportunities in Beccles should be pursued by the Council.	