



# Help plan our future: Options for the new Waveney Local Plan

## Responses to Sites

### August 2016

1 - 19-21 Ravensmere, Beccles .....	6
2 - Allotment land, Somerleyton.....	6
3 - Ashfield Stables, Hall Lane, Oulton .....	9
4 - Blundeston Road (west end), Blundeston .....	9
5 - Brambles Drift, Green Lane, Reydon .....	11
6 - Broadside Park Farm, Reydon.....	13
7 - Burnt Hill Lane to Marsh Lane, Carlton Colville /Lowestoft.....	15
8 - Chenery's Land (East), Cucumber Lane, Beccles / Land at Chenery's Farm, Beccles.....	18
9 - Chenery's Land (West), Cucumber Lane, Beccles / Land at Chenery's Farm, Beccles .....	23
13 - Fairview Farm, Norwich Road, Halesworth / Holton .....	28
14 - Field, Saxon Way, Halesworth .....	30
15 - Firs Garage, Church Road, Uggeshall .....	31
16 - Former Beccles Heat Treatment, Gosford Road, Beccles .....	31
17 - Former Lothingland Hospital Site, Union Lane, Oulton .....	32
18 - Glebe Farm plus adjoining land, Church Avenue, Oulton.....	32
19 - Halesworth Road, Redisham .....	33
20 - Hall Road, Blundeston.....	34
21 - Hall Road, Carlton Colville.....	35
22 - Hammonds Farm, London Road, Lowestoft .....	37
23 - Holly Farm, Wood Lane, Oulton.....	41
24 - Homestead Farm, Ringsfield Road, Beccles.....	41
25 - Hulver Street, Hulver, Henstead With Hulver Street .....	42
26 - Jubilee, Green Lane, Reydon.....	43
27 - Land (off) The Loke, Blundeston, Blundeston.....	46
29 - Land adjacent Millennium Green, Church Road, Blundeston.....	47
30 - Land adjacent to Elms Lane, Wangford with Henham.....	55
31 - Land adjacent to Little Priory, Church Street, Wangford.....	57
32 - Land adjacent to The Oaks, Beccles Road, Holton.....	57



33 - Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft .....	57
34 - Land at Bell Farm (primary area), Carlton Colville .....	64
35 - Land at Bell Farm (secondary area), Carlton Colville .....	65
36 - Land at Cromwell Road and London Road, Weston .....	66
37 - Land at Dukes Bridge, Beccles Road, Bungay .....	66
38 - Land at Green Lane, Reydon .....	67
39 - Land at Grove Farm, Bungay .....	69
40 - Land at Laurel Farm, Hall Lane, Oulton .....	72
41 - Land at London Road (former Ashley Nurseries site), Kessingland .....	73
42 - Land at Market Lane, Blundeston .....	74
43 - Land at Montrose Garage, London Road, Beccles .....	83
44 - Land at Sandpit Lane, Worlingham .....	84
45 - Land at St Johns Road, Bungay .....	86
46 - Land at Swan Lane, Barnby .....	89
47 - Land at the Former Garage, Somerleyton .....	93
48 - Land at The Green, Barnby .....	95
49 - Land at The Homestead, Lound Road, Blundeston .....	98
50 - Land at the junction of Copland Way and the A146, North Cove .....	101
51 - Land at The Old Rectory, Church Lane, Oulton .....	102
52 - Land at Toodley Farm, Station Road, Brampton with Stoven .....	106
53 - Land between Church Lane and Church Avenue, Oulton .....	106
54 - Land between Harbour Road and the west end of the old Shell site, Lowestoft .....	108
55 - Land between Pilgrim's Way and Wingfield Street, Bungay .....	109
56 - Land between Rushmere Road and Fairhead Loke, Gisleham .....	111
57 - Land between The Street and A146, Barnby .....	113
58 - Land east of 17-25 Sotherton Corner, Sotherton / Wangford with Henham .....	115
59 - Land east of Charters Piece, Willingham .....	116
60 - Land east of College Lane, Worlingham .....	117
61 - Land east of Copland Way, Worlingham / Ellough / North Cove .....	118
62 - Land east of Ellough Road, Worlingham .....	124
63 - Land east of Flixton Road, Blundeston .....	126
64 - Land east of Woodfield Close, Willingham .....	136
65 - Land north and east of Hill Farm Road, Halesworth .....	137
66 - Land north of 1-4 East View, St James Road, All Saints and St Nicholas South Elmham .....	150



67 - Land north of Chapel Road, Wrentham .....	150
68 - Land North of Charters Piece, Willingham.....	151
69 - Land north of Church Lane, Ellough.....	153
70 - Land north of Hall Lane, Oulton.....	153
71 - Land north of Hulver Street, Henstead With Hulver Street.....	154
72 - Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane), Beccles.....	155
73 - Land north of Moores Cottages, Holton .....	168
74 - Land north of Morton Peto Close, Somerleyton.....	169
75 - Land north of Snakes Lane, The Street, Lound .....	170
76 - Land north of Sparrowhawk Road, Holton .....	179
77 - Land off Benacre Road (Site 1), Ellough.....	180
78 - Land off Benacre Road (Site 2), Ellough.....	180
79 - Land off Blocka Road, Ashby Dell, Ashby.....	180
80 - Land off Church Lane, Carlton Colville .....	184
81 - Land off Darby Road, Chenery's Farm, Beccles / Weston.....	186
82 - Land off Ellough Road, Worlingham / Beccles .....	187
83 - Land off Mill Lane, Barnby .....	194
84 - Land off Parkhill, Oulton .....	196
85 - Land off Rider Haggard Lane, Kessingland.....	197
86 - Land off Saxons Way, Halesworth .....	199
87 - Land on Bungay Road, Holton.....	200
88 - Land on Hulver Road, Mutford .....	201
89 - Land on Lodge Road, Holton.....	203
90 - Land on The Hill, Barnby, Barnby / Mutford.....	204
91 - Land on the junction of St Olaves Road & Slugg Lane, Herringfleet.....	207
92 - Land on the south side of Southwold Road, Brampton with Stoven.....	208
93 - Land on the south side of Southwold Road (2), Brampton with Stoven .....	209
94 - Land on the West Side of London Road, Shadingfield.....	209
96 - Land opposite St Michael's Church, Church Lane, Oulton.....	209
97 - Land opposite Stoven Row Southwold Road, Brampton with Stoven.....	210
98 - Land rear of Elizabeth Terrace, A12 London Road, Gisleham.....	210
99 - Land south east of Brickfields, Somerleyton .....	212
100 - Land south of 1-4 North End, St James Road, All Saints and St Nicholas South Elmham ..	214



101 - Land south of Hill Cottages, Shadingfield .....	214
102 - Land south of Sparrowhawk Road, Holton .....	218
103 - Land south of The Street (adjacent to 36 Holton Road), Holton .....	220
104 - Land south of The Street, Wissett.....	221
106 - Land to north of 34-48 Old Station Road, Halesworth .....	223
107 - Land to the east of London Road, Weston .....	223
108 - Land to the east of London Road (south of John Lawrence Close), Beccles.....	223
109 - Land to the North of 109 London Road, Kessingland .....	224
110 - Land to the north of Black Street, Gisleham.....	226
111 - Land to the north of the A146 Beccles Road, Lowestoft .....	249
112 - Land to the north of the A146 Beccles Road (2), Lowestoft.....	251
113 - Land to the north west of 1-4 Wangford Road, Uggeshall .....	253
114 - Land to the south of Church Lane, Corton.....	254
115 - Land to the west of Halesworth (Block 1), Halesworth .....	255
116 - Land to the west of Halesworth (Block 2), Halesworth .....	267
117 - Land to the west of Laurel Farm, Reydon.....	279
118 - Land to the west of Laurel Farm (primary area), Reydon.....	286
119 - Land to the west of St Edmunds Church, Kessingland.....	291
120 - Land west of London Road, Wrentham .....	292
121 - Land west of Moores Cottages, Holton .....	293
122 - Land west of Norwich Road, north of Old Station Road, Halesworth .....	293
123 - Lock's Road, Westhall .....	294
124 - London Road, Weston, Weston .....	306
125 - Manor Farm Barns, Church Road, Kessingland.....	306
126 - Marsh Lane, Worlingham.....	307
127 - Mill Farm Field, Somerleyton.....	307
128 - Mill Farm, Somerleyton .....	309
129 - Old horticultural nursery to the north of Oakleigh, Market Lane, Blundeston .....	312
130 - Old Rectory Poultry Unit, Benacre Road, Henstead With Hulver Street .....	316
131 - Orchard Farm Rear Field, New Road, Mutford .....	316
132 - Orchard Farm, New Road, Barnby .....	317
133 - Owls Cottage, Marsh Lane, Worlingham .....	318
134 - Playing Field, off A145 London Road, Shadingfield .....	319
135 - Playing Field, Somerleyton.....	320



136 - Rear of 11, 15, 17, 19 & 21 Birds Lane, Lowestoft.....	321
137 - Rear of Nos 485 & 487 London Road South, Lowestoft .....	322
138 - Saint Felix School (land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon .....	323
139 - Shoe Devil Lane, Ilketshall St Margaret .....	330
140 - Site to the rear of 51 Old Station Road (1), Halesworth .....	331
141 - Site to the rear of 51 Old Station Road, Halesworth (2), Wissett.....	331
142 - Southwold Police Station and former Fire Station site, Blyth Road, Southwold .....	332
143 - St James Lane, St James South Elmham .....	333
144 - Station Road and Molls Lane, Brampton with Stoven .....	335
145 - The Bull Field, Ringsfield Road, Beccles .....	339
146 - The Hill, Shipmeadow .....	343
147 - The Old Rifle Range, A12 London Road, Gisleham .....	346
148 - The Sawmill, Sandy Lane, Holton.....	350
149 - The Street, St Margaret South Elmham .....	353
150 - The Street, St James South Elmham .....	357
151 - Town Farm 1, Land off Harrison's Lane, Halesworth.....	359
152 - Town Farm 2, Land off Harrison's Lane, Halesworth / Holton .....	360
153 - Town Farm 3, Land off Harrison's Lane, Halesworth.....	361
154 - Town Farm 4, Land off Harrison's Lane, Holton .....	363
155 - Town Farm 5, Land off Harrison's Lane, Halesworth.....	364
156 - West of A145 London Road, Beccles .....	366
157 - West of Redisham Road, Brampton with Stoven .....	368
158 - Wood Cottage, London Road, Brampton with Stoven .....	369
159 - West of A144 opposite Triple Plea, Halesworth / Spexhall .....	369
160 - Basley Ground, Bramfield Road, Halesworth .....	370
161 - Dairy Hill, Halesworth .....	370
162 - South of Wissett Road, Halesworth .....	371
163 - West of Roman Way, Halesworth.....	371
164 - Land west of Northern Spine Road/north of Pleasurewood Farm, Oulton / Corton .....	372
165 - Land west of A12 Yarmouth Road, Corton .....	373
166 - Land east of A12 Yarmouth Road, Corton .....	376
167 - Land north of Church Lane, Lound.....	379
168 - Land south of Union Lane, Oulton .....	389



169 - Land south of Union Lane and west of Red House Close, Oulton .....	390
170 - Land south west of Union Lane, Oulton .....	390
171 - Land west of Flixton View, Oulton .....	391
172 - Land to west of Parkhill (south of Spinney Farm), Flixton (East) .....	392

## 1 - 19-21 Ravensmere, Beccles

### Historic England (Debbie Mack)

In Beccles Conservation Area and Grade II 18 Northgate immediately to the west. Potential impact on Conservation Area and setting of Listed Building.

## 2 - Allotment land, Somerleyton

### Paul Douch

Inappropriate & undesirable; this the best place for allotments in the village; vehicular access would be a problem; development would detract from cottages on the Green

### Gerda Gibbs

The allotment land in Somerleyton is in full use by many enthusiastic gardeners. It is supported by a newly founded gardening group and is an invaluable hobby for the many users of this amenity. There is only limited access via very small lane leading off from the historic Somerleyton Village Green. Any development will infringe on the beautiful historic Village Green. It is not suitable for further developments.

### Lisa Jackson

This is a very active allotment site, with very involved tenants. The allotments are not underused. They are nearly full to capacity.

Many tenants have spent years building up their allotments, investing much time and money, which will be lost if building is approved in this area. Fruit trees on the sites will be especially difficult to relocate, and are particularly valuable, costing much to replace; not to mention the work involved in building up a new site, and the loss of produce during relocation.

The access to the site is via a single lane, one way, small unpaved private road around The Green. This road already suffers from an abnormally large amount of traffic, especially due to the Somerleyton Primary School being located on this road. The allotments are at the back of The Green, behind the houses. A dirt track leads off The Green into the allotments. This is a tiny road, which only one vehicle at a time can pass through. With more homes, the amount of traffic would undoubtedly increase, and would be a danger to



locals, particularly school children, and child, and elderly tenants. There are already problems with traffic going around The Green in the wrong direction, and speeding around it. There are parking issues also. There is not enough room for school vehicles to park, or for drop off/pickup, as well as tenants.

Another concern is that our water pressure is currently very low, and that building more homes will cause a problem with the water. There have been at least 2 occasions of burst water mains around the Green road in last 7 years. Can this area cope with the increased demands?

**John Lavery**

THIS IS A GENERAL COMMENT!! I was obliged to choose a site!! These comments refer to ALL proposed developments!!!!!!

I will address individual sites that interest me later. We have a severe lack of infrastructure in North Suffolk especially GP access, Schools, Hospitals, as well as car parking, shopping, internet in Halesworth, Beccles and Bungay These needs MUST be part of ALL development packages. Environmental issues such as water supply, sewage, wild animals and plants etc. also need to be catered for adequately if ANY of these plans come to fruition.

This area is only attractive to residents and visitors alike because it is largely rural and unspoilt. It strikes me that wherever possible brownfield sites like former airfields should be used long before ANY agricultural or conservation land is used to satisfy an unproven (in this area) demand for housing. There is also plenty of land inside urban areas such as Lowestoft, Yarmouth and Ipswich which should be used for development first.

**chris Morris**

Site 2 on the plan area the village allotments (much prized and fully utilised) and site 135 is the playing field, again, a very valued community asset. Neither should be considered for development.

**Julie Reynolds**

A good location in the village, well centred and would link well providing it utilises site number 47. Allotments must be re-sited.

**Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for housing development because it would result in the loss of a valuable amenity, it breaches national planning guidance and the site is in a Special Landscape Area and also the village Conservation Area.

**Historic England (Debbie Mack)**

Located within the Conservation Area, close to Somerleyton Park Historic Parks and Gardens and proximity to The Rosery and adjacent to a plethora of buildings and other historic assets around The Green including the village pump, The Old Farmhouse, County Primary School and a number of dwellings, all grade II listed.



Potential impact upon Conservation Area, Historic Park and Garden and setting of Listed Buildings.

### **Somerleyton Estate (Lord Somerleyton)**

#### **Site Description and Development Potential**

10.1 Site Option 2 (presently allotment land) is located west of The Green and is accessed via an Estate-owned private road. This site is submitted for residential use. A plan of the site is included in Appendix 8.

10.2 The site is 1.6ha in size. According to Policy DM16 a density of 30dph would indicate a minimum of 48 dwellings on this part of the site. **However looking to neighbouring developments and their density and character a figure of 20 to 25 (including 7 affordable homes) is more appropriate.**

10.3 The site is regularly shaped and is generally flat and has an existing vehicular access.

10.4 The site currently in allotment use but is otherwise unconstrained. Approximately 2/3 of the site (1ha) is in active allotment use.

10.5 **It is understood that development of this allotment land would go hand in hand with the relocation of the allotments in the village.** This is possible because of The Estate's wider land ownership.

10.6 **One potential site is immediately to the west of the current allotments. This site is larger than the current area in active allotment use and is adjacent to a footpath so would provide for better pedestrian access to the new allotments from the centre of the village.**

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

10.7 The site sustainability appraisal (SSA) at Point 1 states "loss of allotments and no replacement facilities proposed". This is incorrect.

10.8 In our submissions to the Call for Sites stage (E374.C1.Rep01 paragraph 9.4) we said: "It is understood that development of this allotment land would go hand in hand with the relocation of the allotments in the village. This is possible because of The Estate's wider land ownership. One potential site is immediately to the west of the current allotments. This site is larger than the current area in active allotment use and is adjacent to a footpath so would provide for better pedestrian access to the new allotments from the centre of the village".

10.9 The potential replacement allotment site was shown on our drawing E374/CFS5 submitted with the Call for Sites information.

10.10 For the avoidance of doubt reference to this area of potential replacement allotment is repeated above and shown again on the plan in Appendix 8.

10.11 At Point 4 the SSA states "loss of allotments and limited community facilities located in the village". This is incorrect.

10.12 The allotments were and remain proposed to be replaced on land adjacent. Also the Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised. Suggest the effect should be increased to 0 or +.

10.13 At Point 5 the SSA states "limited potential to deliver affordable housing". This is incorrect. Every other site in Somerleyton has been recognised as being able "to deliver affordable housing" and Site Option 2 is no different. Suggest this effect is raised to + in line with the site assessments in Somerleyton.



10.14 Point 9 of the SSA (which states “likely to create exposed settlement edge”) is contradicted by Point 12 (which acknowledges the “hedgerows along the site boundaries”).

10.15 The hedgerows are substantial and there is an earth embankment too. Point 9 should score at least 0 (neutral).

**Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 2 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

### 3 - Ashfield Stables, Hall Lane, Oulton

**Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

**Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

3 Ashfield Stables, Hall Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

### 4 - Blundeston Road (west end), Blundeston

**andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.



Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

**Beverley Rose**

My comments apply to all the proposed plans for the village of Blundeston.

Where is the infrastructure to build so many houses in Blundeston?

School capacity and other local services?

Why is the prison site not enough for Blundeston?

Wildlife and forney will be drastically affected

I hope that if houses are passed then building companies will be forced to build houses only with materials in keeping with the local area I.e Suffolk brick, tiling etc as previous and present house owners have had to do. Including natural hedging etc.

There are not many villages left in Suffolk that are unspoilt. I agree that a housing plan has to be made for the future generation but not for greedy land owners to make money. Brown field sites should be used as this is more environmentally friendly without the need to tear up the beautiful countryside of Suffolk. The prison should be enough for Blundeston.

There are no local jobs or proposed new businesses in the area and as well as having to construct new roads, build a new school or extend the village school, new doctor services etc, bus services to shops and the town will have to be operated to cater for those without cars, all at the expense of the tax payer. So the overall expense of all of this will not match the gain made for building so many houses. Blundeston will no longer be a village but a town.

I look forward to receiving your comments.



### **CM Woodhouse**

I am writing to oppose the proposed plans for future land for housing development in the Blundeston Road area of Corton – sites 4, 164, 165. We have only just been made aware of these plans!

I object on environmental grounds and totally oppose more of our valuable farmland being lost. With regard to climate change carbon is stored in soil and not in concrete. This will have a major impact on wildlife. My neighbour has reported seeing 30 different species of birds in his garden. I am also concerned about the danger of flooding as a result of more concrete being laid, especially as we seem to be having more erratic weather patterns and exceptionally heavy rain. Where will all this additional water go?

If more houses are built how will the local schools, doctors surgeries cope? We have already lost Oulton surgery and there is a difficulty finding more G.Ps.

Surely in Lowestoft there are many empty sites and also couldn't the Council purchase properties that have been empty and neglected.

### **5 - Brambles Drift, Green Lane, Reydon**

#### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development? Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane. Could perhaps add some houses near Pitches View.

#### **Ms crook**

This area of land is adjacent to a very dangerous corner crossing, Green lane and Wangford Road. Traffic around this junction cannot properly see round the tight corner, adding up to possibly 75 houses would make this problem even worse.

#### **Jim Elmes**

Off Green Lane is the most appropriate.

#### **Mr & Mrs McNally**

We attended the meeting on Tuesday 10 May to view the Waveney Local Plan. We were surprised to see so many homes planned for Reydon. Is there really a need for this amount of extra housing in this area?

We asked the Planning Officer if the necessary infrastructure would be put in place prior to or at the same time the homes would be built. We were shocked to be told that this would not be the case and their remit was just to built houses and there was no link up with any necessary services. We pointed out that there are currently long waiting times for appointments at the Health Centre and treatment times at the James Paget A&E are below targets. The Planning Officer said that shortage of doctors is a



nationwide problem and any improvements needed cannot be part of the housing development plan. There also appears to be no firm plans proposed for more school places, jobs, shops, sewage capacity etc. for the 972 homes mentioned.

It would appear that the area will be overdeveloped to provide housing with no thought for the well being of existing or new residents. Surely this cannot be right and we are writing to ask what action you will be taking.

There is also the concern that a lot of the new property will be second homes and holiday lets and wonder if you will be considering adopting the St Ives ruling of not allowing this type of person to purchase new properties. This would make it less attractive to developers to build such large housing developments.

One last point when does a village enlarge so much to qualify to become a town?

#### **Ruth & John Pigneguy**

Many residents have moved here to live in a semi-natural area. These sites look like massive over-development. Second homes need to be controlled so that we can have local full time residents living here.

#### **clive tickner**

Wholly inappropriate deveopment on AONB farmland. Traffic problems will arise from the fact that there are only two roads from the A12 to Southwold. This will create a village within a village and the local infrastructure will be unable to support it. If we need so many new homes why try to shoehorn them in around an existing peaceful environment? Why not earmark a large area outside of an AONB to build a new village from the start, as has been done with the huge new development near Carlton?

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Historic England (Debbie Mack)**

Grade II\*Church of St Margaret to West -- potential impact on setting of LB

#### **Reydon Parish Council (Jean Brown)**

[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be



considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

#### **Southwold and Reydon Society (Philip O'Hear)**

We believe this site is unsuitable for development. It is outside the boundary of the settlement in open countryside which is part of the AONB and is of a size that is not needed if the target for new housing in Southwold and Reydon is kept at the lower range in the options (ie growth is concentrated in Lowestoft). The infrastructure, in particular the sewage system, is inadequate for this scale of development.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 5; 26 and 38 are in close proximity of Benacre to Easton Bavents SPA and Pakefield to Easton Bavents Site of Special Scientific Interest (SSSI). We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the SPA or the SSSI.

### **6 - Broadside Park Farm, Reydon**

#### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development?  
Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane.  
Could perhaps add some houses near Pitches View.

#### **Kevin Cross**

Broadside Park Farm seems to be a suitable location for holiday homes . I am not so sure about other purposes such as Traveller site

#### **Saty Joshi**

Dear Sir/Madam.... What an excellent idea for public consultation on Planning issues. I am an owner of 2-Plots (#217 and #218, total 4000 sq ft) on Broadside Park Farm, Reydon. Many owners of the 300+ such plots at this location are now coming forward thus increasing the identifiable area for development at Broadside Park Farm. Is log being kept of all the plot owners ?

Being close to the coast and open landscapes, this looks like an ideal location for premium holiday homes or care homes for the elderly.



Many thanks,

S.Joshi

**John Lavery**

This site could only be used for something temporary as it has limited services (roads, sewage etc) and will be a victim of coastal erosion within relatively few years. I suspect there would be strong objections locally to any notion of a traveller or holiday site here as either would be unsightly, possibly noisy, and too close to Southwold.

**Marya Parker**

Any development this close to the coast seems ill-advised as it is so prone to erosion.

**clive tickner**

Totally inappropriate development for AONB farmland, especially as it is an area liable to be consumed by the sea.

**Reydon Parish Council (Jean Brown)**

[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

**Southwold and Reydon Society (Philip O'Hear)**

This site is entirely unsuitable for development. It is remote from the settlement of Reydon, in open countryside which is part of the AONB, and close to the reedbeds which are of national significance. The access of traffic to and from any development on this site onto the busy Lowestoft Road would be dangerous and a nearby proposed (much smaller) development for the Pathfinder scheme was ruled unsuitable because of traffic impact concerns from the highway authority.

If the development of this site were to include a traveller's site and/or a residential care home, these traffic concerns would increase still further.

The scale of development proposed here is both totally inappropriate and unneeded to meet the target of new housing for Southwold and Reydon if the option to concentrate growth in the district around Lowestoft is adopted, which in our view is the most appropriate option for the area.



### **Southwold Town Council (Lesley Beevor)**

Site 6 in Easton Bavents is inappropriate for any development due to lack of infrastructure, its location on a high point on agricultural land in the AONB and on the Suffolk Heritage Coast, and rapidly progressing coastal erosion, which, at this particular location, is happening at a faster rate than anticipated in previous projections.

It is recommended that new surveys be undertaken to revise coastal erosion estimates for Easton Bavents.

### **Suffolk Wildlife Trust (James Meyer)**

Site 6 appears to partly include Pakefield to Easton Bavents SSSI. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on the SSSI.

## **7 - Burnt Hill Lane to Marsh Lane, Carlton Colville /Lowestoft**

### **Anonymous**

I wish to draw your attention to the fact that Waveney District Council, in its new Local Plan for the District, have indicated that land to the north of the A146 Beccles Road in South Oulton Broad is potentially earmarked for development. These areas - marked 111, 112 and 7 on their interactive map - are hard up against the boundary of the Broads National Park and Carlton Marshes and as a result seem wholly unsuitable for building. The areas are currently green fields which form a barrier between the housing to the south of the Beccles Road and the marshes and broad. Any development here would be visible from the Broads National Park from the Carlton Marshes right along to Nicholas Everitt Park in Oulton Broad itself. Properties on the north side of Oulton Broad would also see the housing along with boat users, walkers and other broad users. Many species of wildlife would be disturbed and misplaced should any development take place, and we have regularly seen barn owls hunting in the areas outlined. We feel the Carlton Marshes and Southern Broads would be severely compromised with housing hard up against the park boundary and another wilderness area would be lost forever. Surely there are enough brownfield sites in Lowestoft to develop? The scale of the planned housing is also frightening; 37 houses on plot 111 which will go nowhere to solving any shortage - and a staggering 760 in area 7, which will create a village on top of the marshes. As family members of Suffolk Wildlife Trust, we have contacted them with the proposals of which they are aware and are currently preparing a response. We would implore you to investigate this matter urgently as well and if you require any further information from us please do not hesitate to contact us.

### **Martin Fiddes**

This area is completely unsuitable for new housing as the surrounding road system and main access road - the A146 - is already running at more than capacity, which is clear from the regular tailbacks which stretch from Oulton Broad right back to Hollow Grove Way. The site also backs on to the Broads National Park and Carlton Marshes, managed by the Suffolk Wildlife Trust, and they are very unlikely to allow development to take place right up to their boundary. The area is also home to



many species of wildlife which would clearly be disturbed.

Surely it makes sense to look at developing brownfield sites and there are plenty of ex-industrial areas in the Lowestoft area which should be considered and used before contemplating using greenfield areas?

I also note there are very few areas around Southwold and Reydon marked as suitable for development?

### **Matthew Gooch**

The development of a large number of housing here will put extreme pressure on Carlton Marshes Nature Reserve and the SSSI designations on it which at present suffer from a wildlife disturbance and site misuse point of view.

A further few hundred houses here will mean an increase in dogs walkers using the site and people that the very sensitive condition of the the habitats that are classed as some of the best of their type in the uk will not sustain without major detriment to an area of much enjoyment for the 70,000 people already living in the town. And instead of putting pressure on the nature reserves doorstep we should consider protecting this area for many years to come for the use and pleasure of the people already living in the local area and beyond.

Pressure will increase on wildlife from disturbance an issue that nature conservation struggles with now and the risk here of increased poor quality water ending up in the dykes of high nature conservation for there excellent water quality is also high from increased surface covering, the current internal drainage board system can only just cope with the quantities of water that arrive there from small amounts of rainfall in the catchment which heightens the flood risk of the sensitive sites.

### **Andrew Hughes**

This development would impinge visually on Suffolk Wildlife land the other side of the railway and the development being on rising land would be visible from the marshes. Traffic from this development can only head onto Beccles Road which is already very busy and would inevitably send Traffic going North via Oulton Broad rather than the new Third Crossing putting fresh pressure on the traffic situation there. Would put further pressure on existing local community requirements like heath and schooling as the site isn't big enough to absorb or justify new community developments.

### **S Lineham**

This land is not suitable for development. It provides an open vista towards Oulton Broad, which is important for the local landscape. it is used by gulls, barn owls, deer and foxes and provides a buffer between houses and the nature reserve and Broads National Park.

Beccles Road is already overwhelmed by traffic and is often queued up to the Crown roundabout in the direction of Oulton Broad, Traffic is also heavy in the other direction and queues during peak



times around the Barnby bends. The A146 cannot absorb this extra traffic in either direction, and there is not enough employment in Lowestoft and local area so people will need to travel for work. There is not the capacity in local health services or schools either.

The increased number of people in the immediate vicinity will be highly likely have an adverse impact on nearby Carlton Marshes nature reserve which includes an SSSI. Already there are problems with dogs off leads and fouling, and also antisocial behaviour which is likely to increase with higher volumes of people.

Drainage water could cause pollution in the marshes further down the hill and adversely affect septic tank drainage of properties including the education centre for the wildlife trust,

#### **Mr Millward**

I feel this area especially the space closest to Marsh lane should be left as green area, currently there are horses and on this land and is close to the local community which makes this ideal for owners of such animals also there are allot of deer in the area.

Building in this semi rural area would reduce the green belt and ruin an area of some natural beauty. Two story housing would be a complete eyesore and frankly be a misjudgement.

Marsh lane its self is a one vehicle lane road and this could not carry a greater increase of traffic.

People have bought housing in the area for its tranquility, building would effect this and house prices in the area in a negative way.

We in this are would be strongly opposed to any development.

#### **Broads Authority (Natalie Beal)**

Sites 7 /112 /111 – These lie along the Broads boundary albeit separated by the railway line. Potential for impacts on Landscape character (LCA6) and visual amenity. This would extend the urban boundary of Lowestoft towards the Broads area. Certainly there are likely to be additional recreational pressures as a result of housing development in the area. The Suffolk wildlife Trust and the Carlton marshes reserve lie in close proximity. Housing development at this locating could also create additional land use pressures on fields and grazing marsh in close proximity as residents may seek land for other activities such as allotments, horse grazing etc.

#### **Carlton Colville Town Council (Christine Sayer)**

The Areas 7 and 112 and 111 west of Beccles Road should be kept clear of additional development in order to preserve the wild life of the marshes.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:



Partly in Flood Zone 3

\*Flood Zone – A floodplain is the area that would naturally be affected by flooding if a river rises above its banks, or high tides and stormy seas cause flooding in coastal areas.

<http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

**North Cove Parish Council (Joan Pryce)**

Severe impact on Carlton Nature Reserve, and green infrastructure and important landscape area.

**North Cove Parish Council (Joan Pryce)**

Oppose on visual impact, effect on nature reserve, runoff into SSI., light pollution

**NorCas**

I would not like to see any further development here. Essentially I think Lowestoft is large enough as it is and development should be within the existing borders.

**Suffolk Wildlife Trust (James Meyer)**

Sites 7; 11 and 112 are adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI), these sites are of national and international nature conservation value and a large part of them is owned and managed by Suffolk Wildlife Trust as part of our Carlton and Oulton Marshes reserve. Development in this location appears likely to risk an adverse impact on these sites. The sites may also have ecological value in their own right. For these reasons we would object to their allocation for development.

**8 - Chenery's Land (East), Cucumber Lane, Beccles / Land at Chenery's Farm, Beccles**

**Nicky Elliott**

I think this site, along with sites 81 and 9, provide the best location for the required development in Beccles, provided that access for motor vehicles is made from the Southern Relief Road only. Vehicles will be able to leave and enter the development from east and west via the Southern Relief Road and then north and south on A roads. Other residential roads adjacent to these lands (Darby Road, Nicholson Drive and Cucumber Lane) should provide cycle and pedestrian access only. If the three sites were developed together, the developer could be required to provide some infrastructure such as a community centre, shops, school, health centre, pub, etc.

**Gill Griffiths**



We wish to make the following additional points in respect of Site Option 8: Chenerys Land (East), Cucumber Lane, Beccles.

Point 1 - To improve the health and well-being of the local population:

Although the site adjoins open countryside it has easy access to local services, being a little over 1 mile from the town centre. Links to existing and future pedestrian and cycle networks (which already exist to the east and west of the site) will be built into the development design. This includes linking to the new networks created as part of the approved Southern Relief Road. Walking and cycling will be encouraged thereby in the scheme design. Future occupiers of the site will not therefore need to over rely on the use of vehicles for access to everyday requirements

Point 4 - To improve access to key services and facilities:

The site is within walking (as well as cycling) distance of shops, schools and local facilities as well as the Oak Lane and Cucumber Lane publically maintained accesses.

There are no existing public rights of way over the site however there is a footpath to the North of the site that connects to the nearby school.

Crowfoot Community Primary School and Albert Pye Community Primary School are both just over 1km away and within walking distance of the site. There is also a range of nursery schools in the vicinity.

There are a number of public bus services with nearby bus stops on Queen Elizabeth drive and Banham Road. The buses provide a regular connection to the neighbouring market towns, The City of Norwich and The Coast.

Beccles railway station, although just outside the maximum acceptable 2km walking distance, is within the recommended cycling distance and has good cycle storage facilities available. Trains from here run frequently to Lowestoft and Ipswich providing links to the wider national rail network.

Primary access would be as for BEC 3 via Cucumber Lane / Oak Lane.

If and when the proposed southern relief road is built two alternative access routes may be possible, both avoiding the town centre. The traffic impact of the new relief road will be positive either way, as it will reduce existing vehicular movements (estimated at 200 daily) along Cucumber Lane via Banham Road / Queen Elizabeth Drive. Policy 10 of the National Planning Policy Framework ("NPPF") refers to the need for LPA's to take local circumstances into account (in this case the advent of the relief road) to respond to different opportunities to achieve sustainable development.

Point 6 – To meet the housing requirements of the whole community:

The NPPF places great emphasis on sustainable development and it is a fundamental requirement of development proposals that they satisfy the three principles of sustainability, social, economic and environmental, as set out in paragraph 7 of the framework.



Section 6 of the NPPF places a requirement on Local Planning authorities to:

“...use their evidence base to ensure Local plans meet the full objectively assessed needs for market and affordable housing in the housing market area, so far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

Additional requirements of the NPPF are the need for sites to be deliverable and developable. To be considered deliverable, “...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development site is viable”.

To be considered developable “...sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at this point envisaged”.

It is our view that this complies with all of these specific requirements.

The WDC Strategic Housing and Economic Land Availability Assessment Methodology Consultation Document – Oct 2015 repeats the requirements of the NPPF in terms of assessing whether sites are Deliverable or Developable.

In this document “deliverable sites” are defined as sites which are suitable, available now and achievable within five years. Site no 9, Chenery’s, Land, Cucumber Lane, Beccles meets all of these requirements.

“Developable sites” are described as sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period.

The document states that a site will normally be considered “Available” if it is within the ownership of a developer who has expressed an intention to develop / sell the land for development. This site meets the requirements.

A site will be considered “Achievable” where there is reasonable prospect that development will occur on the site at a particular time. A key factor is the economic viability of the site. Influences include market attractiveness, the location of the site and any abnormal constraints on the site. Beccles is a very popular place to live which commands an extremely strong position in the local housing market. There are no known abnormal constraints on developing this site. We consider therefore this site meets the requirements that allow it to be considered achievable.

Section 3:11 of the Site Specific Allocations for the Beccles area (adopted January 2011) acknowledged that due to the very limited opportunities to allocate brown field sites on the edge of the built up area that greenfield land would be allocated. Specific reference was made in policy 3.44 in connection with BEC3 to “the land at Cucumber Lane / Oak Lane being the next best available site despite being classified as greenfield”.

Site No 8 provides the opportunity to develop in a sustainable location that is away from areas prone to flooding and that is accessible by other modes of transport without reliance by the private car. Emphasis will be upon homes which are inclusive, accessible, adaptable, sustainable and good value.



Point 7 – To maintain air quality:

Proximity to the town centre and pedestrian / cyclist routes should mean less traffic movements than there would be with an out of town development.

Point 8 – To maintain and improve water quality:

Recent reports from Anglian Water and Essex and Suffolk suggest that there is capacity in the supply and sewerage treatment system to accommodate such development as is proposed.

An appropriate mix of ponds, swales and other relevant sustainable measures would be incorporated to provide surface water disposal.

Point 9 – To conserve and enhance the quality and distinctiveness of landscape and townscapes:

The “irregular shape” of the site must be seen in the context of the permitted development to the immediate north (BEC 3) and south (Landoc). Arguably, the site could be described as infill. Development would be designed to blend in with the existing landscape and surroundings.

Point 10 - To reduce contributions to climate change and mitigate the effects:

Low carbon processes will be employed during the development process where appropriate and viable. Renewable energy sources may become viable and flexibility will be provided to allow for this.

The connectivity of the site is a significant factor; travel by car is not essential from this site.

Point 11- To consider natural resources:

As the site is bounded to its north and south by development sites arguments about the loss of greenfield land are circumventable. The land is low quality Grade 3 agricultural land, which has consistently yielded lesser crop returns than neighbouring land.

Point 12 – To conserve and enhance biodiversity and geodiversity:

Recent studies suggest there is no flood risk to the site. Development strategy would ensure there is no offsite flood risk either.

Appropriate measures will be taken at the design stage to allow for drainage from the site and to ensure that long term biodiversity and geodiversity is maintained and supported.

Point 14 –To achieve sustained and realistic economic growth.

Economic growth generally would be stimulated by the provision of a choice of homes near to the town, business parks and Enterprise Zone. NPPF policy 23 requires LPA's to recognize town centres as being the heart of communities and requires policies which support their viability and vitality. The forecast in Waveney's core strategy was for over 5,000 new jobs in the district by



2025, with 20% of these in the market towns. Paragraph 3.22 of that document included in the guiding principles for the development of Beccles:

- The attractive and historic town centre having a broader range of shops and services;
- Beccles Business Park offering increased opportunities for work.

The adopted Core Strategy (CS) identified a need for 6,960 homes to be built in Waveney between 2001-2025 at an average rate of 290/ year. The WDC AMR 2014/2015 confirms that the total number of dwellings completed up to March 31st 2015 is in line with the CS requirements but annual completions for the last couple of years have been significantly less than the annual target of 290.

The new Local Plan will cover the period up to 2036. It is acknowledged there is a need to plan for significant growth. Waveney's population is both a growing and ageing one. Between 2011 (the date of the last census) and 2036 it is forecast that the population of the district will grow by at least 8000. It has also been confirmed that more people are moving into the area than leaving it and households are getting smaller. Even with no population growth therefore there is a need to plan for more housing. The consultation document "Options for the New Local Plan" identifies three different growth scenarios which show different levels of housing and economic growth during the local plan period. Annual housing growth could range from 308 dwellings (dw)/year, 340dw/year or 380 dw/ year. The document also proposes four different options for how growth and development should be distributed throughout the district, with Lowestoft accommodating a minimum of 55% of proposed new development and potentially up to 75%. Whichever one of the options for growth outlined in the consultation document is decided upon, significant growth is still anticipated for Beccles, the largest of the market towns.

Development on this edge of town site would help WDC meet its housing targets and would be conducive to the achievement of the 2 objectives in para 3.22. The town centre would almost certainly attract greater investment from higher footfall and demand and travel to work time would be minimal. The size of the site and scale of the proposed development should allay concern about any potential threat to the loss of business to out of town retail developments or over expansion and ruination of the historic town centre.

An established local developer has committed to the early development of the site with a relatively short timescale, subject to a satisfactory Planning Permission.

Policy 14 of the NPPF requires LPA's to "positively seek opportunities to meet the development needs of their area".

The development itself will create new jobs during the construction phase and provide opportunity for a range of associated service providers once complete.

Point 16 – To enhance the viability and vitality of town centres.

Policy 23 of the NPPF refers to the promoting of competitive town centres with more choice and offerings and to the important role played by residential development in this respect. Increased town centre investment would be encouraged by increased footfall from nearby developments.

Policy 24 of the NPPF refers to preference being given in out of town centre proposals to



“accessible sites that are well connected to the town centre”.

Site 8 satisfies both of these requirements.

Point 17 – To encourage efficient patterns of movement in support of economic growth

The site is bounded by national regional cycle route 30, which together with existing byways and footpaths, provide easy access by foot and by bicycle to areas of employment in the town centre the existing employment areas, Enterprise Zone, nearby Beccles Business Park and Ellough Industrial area.

The proposed future footway / cycleway and the extension of the byway linking Oak Lane to Ellough Road, which will be constructed as part of the approved relief road, will further the opportunity for efficient patterns of movement to support economic growth.

#### **Beccles Society (Paul Fletcher)**

The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

### **9 - Chenery's Land (West), Cucumber Lane, Beccles / Land at Chenery's Farm, Beccles**

#### **Nicky Elliott**

I think this site, along with sites 81 and 8, provide the best location for the required development in Beccles, provided that access for motor vehicles is made from the Southern Relief Road only. Vehicles will be able to leave and enter the development from the east and west via the Southern Relief Road, and then north and south on A roads. Other residential roads adjacent to these lands (Darby Road, Nicholson Drive and Cucumber Lane) should provide cycle and pedestrian access only. If the three sites were developed together, the developer could be required to provide some infrastructure such as a community centre, shops, school, health centre, pub, etc.

#### **Gill Griffiths**

We wish to make the following additional points in respect of Site Option 9: Chenerys Land



(west), Cucumber Lane, Beccles.

Point 1 - To improve the health and well-being of the local population:

Although the site adjoins open countryside it has easy access to local services, being a little over 1 mile from the town centre. Links to existing and future pedestrian footpaths, bridleways and the regional cycle network (which already exist to the east and south of the site) will be built into the development design. This includes linking to the new networks created as part of the approved Southern Relief Road. Walking and cycling will be encouraged thereby in the scheme design. Future occupiers of the site will not need to over rely on the use of vehicles for access to everyday requirements

Point 4 - To improve access to key services and facilities:

The site is within walking (as well as cycling) distance of shops, schools and local facilities as well as the Oak Lane and Cucumber Lane publically maintained accesses.

There are no existing public rights of way over the site however there is a footpath to the North of the site that connects to the nearby school.

Crowfoot Community Primary School and Albert Pye Community Primary School are both just over 1km away and within walking distance of the site. There is also a range of nursery schools in the vicinity.

There are a number of public bus services with nearby bus stops on Queen Elizabeth drive and Banham Road. The buses provide a regular connection to the neighbouring market towns, The City of Norwich and The Coast.

Beccles railway station, although just outside the maximum acceptable 2km walking distance, is within the recommended cycling distance and has good cycle storage facilities available. Trains from here run frequently to Lowestoft and Ipswich providing links to the wider national rail network.

Primary access would be as for BEC 3 via Cucumber Lane / Oak Lane.

If and when the proposed southern relief road is built two alternative access routes may be possible, both avoiding the town centre. The traffic impact of the new relief road will be positive either way, as it will reduce existing vehicular movements (estimated at 200 daily) along Cucumber Lane via Banham Road / Queen Elizabeth Drive. Policy 10 of the National Planning Policy Framework ("NPPF") refers to the need for LPA's to take local circumstances into account (in this case the advent of the relief road) to respond to different opportunities to achieve sustainable development.

Point 6 – To meet the housing requirements of the whole community:

The NPPF places great emphasis on sustainable development and it is a fundamental requirement of development proposals that they satisfy the three principles of sustainability, social, economic and environmental, as set out in paragraph 7 of the framework.

Section 6 of the NPPF places a requirement on Local Planning authorities to:



“...use their evidence base to ensure Local plans meet the full objectively assessed needs for market and affordable housing in the housing market area, so far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

Additional requirements of the NPPF are the need for sites to be deliverable and developable. To be considered deliverable, “...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development site is viable”.

To be considered developable “...sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at this point envisaged”.

It is our view that this complies with all of these specific requirements.

The WDC Strategic Housing and Economic Land Availability Assessment Methodology Consultation Document – Oct 2015 repeats the requirements of the NPPF in terms of assessing whether sites are Deliverable or Developable.

In this document “deliverable sites” are defined as sites which are suitable, available now and achievable within five years. Site no 9, Chenerys, Land, Cucumber Lane, Beccles meets all of these requirements.

“Developable sites” are described as sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period.

The document states that a site will normally be considered “Available” if it is within the ownership of a developer who has expressed an intention to develop / sell the land for development. This site meets the requirements.

A site will be considered “Achievable” where there is reasonable prospect that development will occur on the site at a particular time. A key factor is the economic viability of the site. Influences include market attractiveness, the location of the site and any abnormal constraints on the site. Beccles is a very popular place to live which commands an extremely strong position in the local housing market. There are no known abnormal constraints on developing this site. We consider therefore this site meets the requirements that allow it to be considered achievable.

Section 3:11 of the Site Specific Allocations for the Beccles area (adopted January 2011) acknowledged that due to the very limited opportunities to allocate brown field sites on the edge of the built up area that greenfield land would be allocated. Specific reference was made in policy 3.44 in connection with BEC3 to “the land at Cucumber Lane / Oak Lane being the next best available site despite being classified as greenfield”.

Site No 9 provides the opportunity to develop in a sustainable location that is away from areas prone to flooding and that is accessible by other modes of transport without reliance by the private car. Emphasis will be upon homes which are inclusive, accessible, adaptable, sustainable and good value.



Point 7 – To maintain air quality:

Proximity to the town centre and pedestrian / cyclist routes should mean less traffic movements than there would be with an out of town development.

Point 8 – To maintain and improve water quality:

Recent reports from Anglian Water and Essex and Suffolk suggest that there is capacity in the supply and sewerage treatment system to accommodate such development as is proposed.

An appropriate mix of ponds, swales and other relevant sustainable measures would be incorporated to provide surface water disposal.

Point 9 – To conserve and enhance the quality and distinctiveness of landscape and townscapes:

The site adjoins existing residential development to the North. Development would be designed to blend in with the existing landscape and surroundings and incorporate appropriate green amenity space and structural planting.

Point 10 - To reduce contributions to climate change and mitigate the effects:

Low carbon processes will be employed during the development process where appropriate and viable. Renewable energy sources may become viable and flexibility will be provided to allow for this.

The connectivity of the site is a significant factor; travel by car is not essential from this site.

Point 11- To consider natural resources:

The site is bounded to its north by existing residential development. The land is low quality Grade 3 agricultural land, which has consistently yielded lesser crop returns than neighbouring land.

Point 12 – To conserve and enhance biodiversity and geodiversity:

Recent studies suggest there is no flood risk to the site. Development strategy would ensure there is no offsite flood risk either.

Appropriate measures will be taken at the design stage to allow for drainage from the site and to ensure that long term biodiversity and geodiversity is maintained and supported.

Point 14 –To achieve sustained and realistic economic growth.

Economic growth generally would be stimulated by the provision of a choice of homes near to the town, business parks and Enterprise Zone. NPPF policy 23 requires LPA's to recognize town centres as being the heart of communities and requires policies which support their viability and vitality. The forecast in Waveney's core strategy was for over 5,000 new jobs in the district by 2025, with 20% of these in the market towns. Paragraph 3.22 of that document included in the guiding principles for the development of Beccles:

- "the attractive and historic town centre having a broader range of shops and services;



- Beccles Business Park offering increased opportunities for work”.

The adopted Core Strategy (CS) identified a need for 6,960 homes to be built in Waveney between 2001-2025 at an average rate of 290/ year. The WDC AMR 2014/2015 confirms that the total number of dwellings completed up to March 31st 2015 is in line with the CS requirements but annual completions for the last couple of years have been significantly less than the annual target of 290.

The new Local Plan will cover the period up to 2036. It is acknowledged there is a need to plan for significant growth. Waveney’s population is both a growing and ageing one. Between 2011 (the date of the last census) and 2036 it is forecast that the population of the district will grow by at least 8000. It has also been confirmed that more people are moving into the area than leaving it and households are getting smaller. Even with no population growth therefore there is a need to plan for more housing. The consultation document “Options for the New Local Plan” identifies three different growth scenarios which show different levels of housing and economic growth during the local plan period. Annual housing growth could range from 308 dwellings (dw)/year, 340dw/year or 380 dw/ year. The document also proposes four different options for how growth and development should be distributed throughout the district, with Lowestoft accommodating a minimum of 55% of proposed new development and potentially up to 75%. Whichever one of the options for growth outlined in the consultation document is decided, significant growth is still anticipated for Beccles, the largest of the market towns.

Development on this edge of town site would help WDC meet its housing targets and would be conducive to the achievement of the 2 objectives in para 3.22. The town centre would almost certainly attract greater investment from higher footfall and demand and travel to work time would be minimal. The size of the site and scale of the proposed development should allay concern about any potential threat to the loss of business to out of town retail developments or over expansion and ruination of the historic town centre.

An established local developer has committed to the early development of the site with a relatively short timescale, subject to a satisfactory Planning Permission.

Policy 14 of the NPPF requires LPA’s to “positively seek opportunities to meet the development needs of their area”.

The development itself will create new jobs during the construction phase and provide opportunity for a range of associated service providers once complete.

Point 16 – To enhance the viability and vitality of town centres.

Policy 23 of the NPPF refers to the promoting of competitive town centres with more choice and offerings and to the important role played by residential development in this respect. Increased town centre investment would be encouraged by increased footfall from nearby developments.

Policy 24 of the NPPF refers to preference being given in out of town centre proposals to “accessible sites that are well connected to the town centre”.

Site 9 satisfies both of these requirements.



Point 17 – To encourage efficient patterns of movement in support of economic growth

The site is bounded by national regional cycle route 30, which together with existing byways and footpaths, provide easy access by foot and by bicycle to areas of employment in the town centre the existing employment areas, Enterprise Zone, nearby Beccles Business Park and Ellough Industrial area.

The proposed future footway / cycleway and the extension of the byway linking Oak Lane to Ellough Road, which will be constructed as part of the approved relief road, will further the opportunity for efficient patterns of movement to support economic growth.

**Beccles Society (Paul Fletcher)**

The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

**Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

**13 - Fairview Farm, Norwich Road, Halesworth / Holton**

**Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 1

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

**Halesworth Town Council (N Rees)**

Site 13 very important natural habitat.

**Historic England (Debbie Mack)**



Archers Cottage, grade II to east. Potential impact on setting of listed building.

### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
- ▶ 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane
- ▶ 102 - Land south of Sparrowhawk Road
- ▶ 13 - Fairview Farm, Norwich Road
- ▶ 30 - Land adjacent to Elms Lane

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

### **Appendices - National Grid Assets**



Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)

#### **Suffolk Wildlife Trust (James Meyer)**

Site 13 is adjacent to Fairview Farm Meadow CWS and, based on aerial photographs, may also contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the CWS or any existing ecological value that the site has.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This site was identified as having very important natural habitat with newts, frogs and diverse wildlife and fauna. It was rejected as a site for sports development and a campaign by the owners and residents of Halesworth to preserve this natural area had the support of Mr Gummer (the then MP for Suffolk Coastal and Environment Minister). That natural wild life and fauna is still active and must be preserved.

### **14 - Field, Saxon Way, Halesworth**

#### **Tony L**

Isn't this a flood plain and therefore should not be given over for development. The 'Tesco Site' on the opposite side of Saxon Way is not shown for potential development so assume that is already progressing as it is by far the best site in Halesworth for housing.

#### **Historic England (Debbie Mack)**

Proximity to Gothic House, grade II\* listed building to west. Potential impact upon setting of Listed Building.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 14; 76; 86; and 160 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse



impact on any existing ecological value that they have.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 14 in isolation has access problems onto Saxons Way and there are concerns that an additional residential care home, taking into account those awaiting planning approval, would increase generation/age imbalance

#### **15 - Firs Garage, Church Road, Uggeshall**

##### **Historic England (Debbie Mack)**

Proximity to Church of St Mary, grade I as well as several grade II listed buildings including Church Farmhouse, Uggeshall House, Churchyard walling, Whitehouse Farm and barn. Potential impact upon setting of high grade listed building and other listed buildings.

#### **16 - Former Beccles Heat Treatment, Gosford Road, Beccles**

##### **David Bennett**

Development of this site needs to be integrated into an overall development plan for the whole area surrounding site 16. There is an adjacent larger undeveloped site, owned I believe by Roy's Supermarket, that had planning permission for retail and housing, but this has now lapsed. The surrounding buildings are, in the main, left overs from the previous industrial use of the land, and some are of poor quality. There are existing businesses in these buildings that maybe could be relocated to new retail and light industrial units within a major redevelopment of the whole area encompassed by Fair Close, Gosford Road and the boundary to Roy's Supermarket. Much of the area is a brownfield site, centrally located within Beccles town and needs to be sympathetically developed to meet a possible combination of housing, retail and light industrial needs.

##### **Nicky Elliott**

This site has been put forward for housing, but due to its central location, I think it would be much better developed as indoor sports facilities.

##### **Councillor Caroline Topping**



As I said earlier, I am not against Beccles having new affordable homes and bungalows however these need to be built in manageable sizes around the periphery of the town and brown field sites such as plot 16 (24 homes) in the town centre and plots 156 (260 homes), 43 (40 homes), 108 (49 homes) all along a current main road, where there is currently little development and not feeding into the current traffic hot spots which is Ingate Street/Lowestoft Road.

#### **Historic England (Debbie Mack)**

Partly in Beccles Conservation Area and nearby a number of Grade II Listed Buildings on Blyburgate. Potential impact upon Conservation Area and setting of Listed buildings

### **17 - Former Lothingland Hospital Site, Union Lane, Oulton**

#### **Historic England (Debbie Mack)**

Proximity of The Lodge and The Hall, both grade II listed to the east and ruins of Church of St Andrew also grade II to the west. Potential impact upon the setting of Listed buildings.

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:  
17 Former Lothingland Hospital Site, Union Lane  
We do not consider this site suitable for development due to poor access and egress road infrastructure.

#### **NorCas**

There is a possible irony here in that a former Hospital Site in being used for housing that would in its self require additional medical facilities. Just like most of the proposals herein around Oulton examples of over development.

### **18 - Glebe Farm plus adjoining land, Church Avenue, Oulton**

#### **Broads Authority (Natalie Beal)**

Sites 18/53/51 Camps Heath area. There are existing pressures on Oulton Broad marshes relating to land use. I believe there is an article 4 direction on the land now. Additional housing may add to these pressures as well



on the marshes as a recreational resource.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Historic England (Debbie Mack)**

Close to Church of St Michael, grade I listed building. Potential impact upon setting of high grade listed building (though maybe screened by The Spinney)

#### **Oulton Parish Council (Carolyn Gosling)**

• Sites not suitable for development:

18 Glebe Farm plus adjoining land, Church Avenue

We do not consider this site suitable for development due to poor access and egress road infrastructure.

#### **NorCas**

Any development here would have to be carefully landscaped and sited. The area has certain charm and it could easily be spoilt. Would probably add to the strain on services particularly now that a local doctors surgery has gone.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 18; 23; 51; 53 and 96 are in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

### **19 - Halesworth Road, Redisham**

#### **Historic England (Debbie Mack)**

Church of St Peter Grade I listed to north. Potential impact on setting of high grade listed building.

#### **Redisham Parish Meeting (Michael Parry)**

The suggestion is that this site could accommodate 6 units which may prove excessive as the amount of land



available is very small. We would not be against building here in principle, but there are difficulties as the area, including the adjacent Halesworth road floods regularly. It would be necessary to include significant drainage works to avoid making the current problem worse.

An existing problem is the danger faced by motorists turning from the Brampton road into Redisham, particularly those needing to turn North towards Beccles. There is a current need for traffic calming and the problem would get worse with additional housing. We recommend that any plan to develop housing or roads here should incorporate a redesign for this junction - possibly a small roundabout.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 19 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

### **20 - Hall Road, Blundeston**

#### **andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

#### **John Mitchell**

Site 20 suggested for 8 houses viewed in isolation, seems unrelated to the village envelope. If the field surrounding this triangle, extending towards church road, is developed for housing, there could be some clear advantages. Development of this field, in association with the prison site, could be argued as compacting the village. In addition, there is a clear opportunity for planning gain, as parking for the school could be incorporated into the development of this site. Currently, and particularly since the expansion of the school, parking and access problems are a matter of great concern locally. During peak times, Church Road is reduced to a single narrow lane for traffic in both directions. There are near misses, frustrations and congestion on a daily basis.

#### **Historic England (Debbie Mack)**



Blundeston House Grade II Listed building to north west. Potential impact on setting of Listed Building.

## 21 - Hall Road, Carlton Colville

### Andrew Deal

Site number 21 Hall Road Carlton Colville.

The site is proposed as a residential development of approximately 120 dwellings.

Any development on this site would severely impact on the infrastructure of this area of Carlton Colville as follows:

A) Surface Water from approximately 4 Hec would need to discharge into the southern end of Kirkley Stream, a watercourse that has been the subject of regular flooding in The Street & Rushmere Road. Any additional discharge would be contrary to the principles adopted by SCC, Waveney District Council which states "ensure that development avoids areas of risk"

B) Fould drains would discharge into the Anglian Water pumping station in The Street and capacity of the pumps would need to be confirmed as capable of accepting additional flows.

C) Hall road is narrow and congested particularly at school times. Extra traffic would make this situation worse.

D) The local school may find a potential 200 extra pupils a problem not only for teaching but aggravate parking problems and child safety.

In essence this site should not be considered for any kind of development

### B Warnes

Additional comments on behalf of the landowner:

We wish to submit the following additional comments with regard to Site 21 Land at Hall Road Carlton Colville on behalf of our client Warnes & Sons Ltds who are the land owner and who are renowned and well established local house builders.

We note that the site has scored highly on several of the criteria used to assess the suitability of the site for residential development. In terms of scale and location we consider the site to be one of the most suitable sites put forward for residential development within the Lowestoft area. It is a highly sustainable site well related to the existing built up residential area and is surrounded on three sides by existing development. The site will have excellent access to the many and varied local facilities and services available within Carlton Colville. Furthermore public transport services are within walking distance of the site providing access to additional facilities available within Lowestoft and Beccles. Future occupiers of the site therefore will not need



to over rely on the use of private cars for access to everyday needs.

The Council have identified the site as being Grade 1 agricultural land. The approach taken towards agricultural land classification however tends to be very "broad brush" which dates back to pre 1988. Information supplied by Nicholas Rudge of Durrants classifies the site as Grade 2. The land has not been in agricultural use for over 10 years and until 3 years ago had become completely overgrown; it is now being maintained to suppress the brambles and avoid becoming an eyesore again. There would therefore be no loss of land in active agricultural production.

If reliance is to be placed on the Agricultural Land Classification maps virtually all of the land to the south of Lowestoft is either Grade 1 or 2 including several other sites that have been put forward as suggested residential allocations.

The National Planning Policy Framework (NPPF) places great emphasis on sustainable development and it is a fundamental requirement of development proposals that they satisfy the three principles of sustainability, social, economic and environmental as set out in paragraph 7 of the Framework.

Section 6 of the NPPF places a requirement on Local Planning authorities to;

"... use their evidence base to ensure Local Plans meet the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including **identifying key sites which are critical to the delivery of the housing strategy over the plan period**

identify and update annually a supply of specific deliverable sites sufficient to provide **five years worth of housing against their housing requirement with an additional buffer of 5%** ( moved forward from later in the plan period) to ensure choice and competition in the market for land..."

Further requirements of the NPPF are the need for sites to be deliverable and developable. To be considered deliverable, "...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable".

To be considered developable "...sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged". It is considered the site adequately complies with these specific requirements.

The WDC Strategic Housing and Economic Land Availability Assessment Methodology Consultation Document (Oct 2015) echoes the requirements of the NPPF in terms of assessing whether sites are Deliverable or Developable. In this document:

"deliverable sites" are defined as sites which are suitable, available now and achievable within five years. Site 21 Land at Hall Lane Carlton Colville meets these requirements.

"Developable sites" are described as sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period.

The documents goes on to explain that a site will normally be considered "Available" if the site is within the ownership of a developer who has expressed an intention to develop or sell the land for development. Our client's land readily meets this requirement.

A site will be considered "Achievable" where there is reasonable prospect that development will occur on the site at a particular time. A key determinant is the economic viability of the site while influences include market attractiveness, the location of the site in respect of the property market and any abnormal constraints on the site. Carlton Colville has emerged as highly popular location in which to live in South Lowestoft and commands a strong position in the local housing market. There are no known abnormal constraints on our clients land.



We consider therefore the development of this site is achievable

The adopted Core Strategy (CS) identified a need for 6,960 homes to be built in Waveney between 2001-2025 at an average annual rate of 290/year. The WDC AMR 2014/2015 confirms that the total number of dwellings completed up to March 31st 2015 is in line with the CS requirements although annual completions for the last few years have been well below the annual target of 290.

The new local plan will cover the period up to 2036 and it is acknowledged there is need to plan for significant growth. Waveney's population is growing and ageing; between 2011 (the date of the last census) and 2036 it is anticipated the population of the District will grow by at least 8000. It has also been identified District will experience net inward migration and also that households are getting smaller. Even with no population growth therefore there is a need to plan for more housing.

The consultation document "Options for the New Local Plan" identifies three different growth scenarios showing different levels of housing and economic growth during the plan period. Annual housing growth could range from 308 dwellings(dw)/ year, 340 dw/year or 380 dw/year. The consultation document also proposes four different options for how growth and development should be distributed throughout the District with Lowestoft accommodating a minimum of 55% of proposed new development but potentially accommodating up to 75%.

Irrespective of which of the future options for growth outlined in the consultation document is pursued, considerable growth is still expected to take place within Lowestoft, including Carlton Colville and Oulton. This site therefore will make a valuable contribution towards assisting the District Council in meeting their housing targets. The site is well located to the existing built up area of Carlton Colville/ South Lowestoft and will have easy access by foot or bike to a good range of everyday facilities including schools, churches, convenience food shops, employment opportunities etc. It is located in close proximity to bus stops with frequent bus services to Lowestoft and Beccles providing easy access to additional facilities and services.

#### **Historic England (Debbie Mack)**

Moated Site Scheduled Monument to east. Potential impact on setting.

#### **NorCas**

There too development in the Carlton Colville area and further building will over stress services and communications

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 21; 22; 34 and 98 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **22 - Hammonds Farm, London Road, Lowestoft**

**Teresa Garbutt**



As a long-term resident of the Waveney area, please find below my thoughts/comments on three of the proposed blocks of land:

Site 22 (117 proposed dwellings) – Hammonds Farm  
Site 147 (473 proposed dwellings) – Old Rifle Range  
Site 98 (54 proposed dwellings) – Rear of Elizabeth Terrace

These three sites provide a fabulous opportunity for different types of housing in South Lowestoft. Each block of land could provide a specific type of housing to meet different needs, and together they would form a diverse development that accommodates residents of all ages. The three sites could be developed as follows:

Site 22 – Affordable rented 1-2 bed apartments  
Site 147 – Affordable rented 2-3 bed houses  
Site 98 – Affordable rented 1-2 bed retirement accommodation (flats/bungalows)

Sites 22, 147 and 98 are also ideally placed to service this diverse range of residents, and the surrounding amenities would fulfil their requirements and provide a greater quality of life:

1. Close to schools for those with children
2. Close to shops (literally over the road, so can leave car at home and reduce carbon footprint)
3. On main bus route – Lowestoft to the north, and Kessingland/Southwold to the south
4. Close to the beach. This provides a free 'day out' for those with young children, and a pleasant walk in the fresh air for older residents. Many elderly people have mobility issues, and the proximity of the beach to the three sites makes it feasible in terms of exercise and enjoying the natural environment

This site could also provide an opportunity to provide a new type of private 'rented' property to the residents of Waveney. A large percentage of the population are now priced out of the housing market, and according to The Guardian, 'by 2025, more than half those under 40 will be living in properties owned by private landlords' (2015, see link below).

<http://www.theguardian.com/money/2015/jul/22/pwc-report-generation-rent-to-grow-over-next-decade>

Unfortunately, many of these people are not only priced out of the housing market, but are also ineligible for Social Housing. This leaves them in a 'no mans land' of private rentals, with little long-term security based on the current practice of 'two months notice' within their tenancy agreements.

Could Waveney provide quality and affordable 'private' rental properties that give greater security to tenants? After an initial six months probation within the property, could a longer lease period be agreed between tenant and landlord (say 5-10 years) as they do in continental Europe? This would be beneficial on several levels:

- Landlords have the security of knowing they have a quality tenant in their property
- Tenants have the security of knowing they are not permanently on 'two months notice' within the property.

(This also encourages investment in the property by the tenant (new carpets, decoration etc), that they may not feel committed to make on a short term notice lease)

- Tenants looking to rent for a fixed term (5-10 years) could use that period in an 'affordable' rented property to save up for a deposit on a place of their own. If they subsequently become part of a couple, then a double income can assist in this process



All of the above contributes to a greater harmony in the landlord/tenant relationship, and provides stable and realistic housing opportunities for the residents of Waveney.

I believe that these three sites have fabulous housing potential within the Lowestoft area, and provide a very good quality of life for the future residents who live there.

#### **Bruce Provan**

It is crucially important to keep the buffer between Lowestoft and Kessingland

#### **Tegerdine**

On behalf of Martin and Lawrence Tegerdine, we wish to support the development of site 22 for housing, in conjunction with site 147 to the immediate south. Together, these sites represent a sustainable and deliverable option for accommodating a significant quantum of the planned growth for Lowestoft, whilst also providing an opportunity to create an attractive, defensible southern boundary to the town through a well-designed Sustainable Urban Extension.

The site is well related to the existing built development of Pakefield, and is contained in landscape terms by the existing development to the east. In terms of accessibility and sustainability, there is an existing footway on the eastern side of the A12 which allows pedestrian and cycle access into Pakefield. The site is also well-served by public transport, with regular services to Lowestoft and Great Yarmouth to the north and Kessingland and Southwold to the south, running along the A12 London Road. The site is well-located in relation to the existing Primary School in Pakefield, and the new High School which is currently under construction on London Road, approximately 500m to the north of the site. The proposed retail units to the north-west of the site, for which a resolution to approve has been granted, and the existing retail units further south, are readily accessible by foot or by cycle, as are the employment areas to the west.

Contributions to community infrastructure could be secured either through CIL payments, or through on-site provision. Allocation of the site, in conjunction with site 22 of the north, would enable a comprehensive masterplan to be drawn up for a Sustainable Urban Extension to the south of Pakefield, which would consider the provision of all types of infrastructure.

In conclusion, it is considered that development of site 22, together with the north-eastern quadrant of site 147 could provide a considerable quantum of the new homes planned for the District and more specifically Lowestoft, in a sustainable location that is well-related to existing and proposed services and infrastructure and which provides an excellent opportunity to create an attractive entrance into Lowestoft from the south, with a clear and defensible southern boundary to the town. In addition, the combined sites are capable of providing a significant area of public open space, to the benefit of the wider community, and meeting infrastructure needs either on-site or through financial contributions.

#### **NorCas**

Too much development in this area already and any more will exceed the ability to provide services and viable communications

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 21; 22; 34 and 98 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated



that this would not result in an adverse impact on any existing ecological value that they have.

#### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The “*Initial sustainability Appraisal of Emerging Options*” is encouraging in that the only negative points identified relate to

- (a) “Conserving and enhancing the quality and distinctiveness of landscapes and townscapes”
- (b) Conserving Natural Resources
- (c) To reduce contribution to climate change and mitigate effects”

With regards to (a) the site is partially Brownfield and there is room to include additional strategic landscaping and open space. With regards to (b) & (c), it is inevitable that there will be negative issues around these based on potential use of greenfield land, but this situation applies to the vast majority of sites being promoted through this land bid exercise.

2.0 The site offer potentially 117 dwellings (LPA estimate) and although largely a greenfield site there is a brownfield element and access road .In any event within the present search for sites , the LPA has recognised that greenfield development is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft. Furthermore the Council predicts that 7700 new homes will be needed up to 2036, which is likely to be a conservative estimate; and therefore there is considerable pressure to release additional housing land. The fact that the Council is still actively seeking further land bids demonstrates this point.

3.0 The site is adjacent to both residential and holiday accommodation to the north and could be built out as a “stand alone” site, without impacting on landscape issues in the area; however there is also scope to look at a consolidated approach with land to the south in separate ownership which is also being promoted and is identified as **Site 147**.

4.0 Furthermore there is also scope to include **Site 98** (in the same ownership as **Site 22**) to the south of **Site 147** to further consolidate the overall area which is already compromised by the presence of S.L.I.E to the immediate west & Pontins to the south, unlike several other potential sites in South Lowestoft which appear to be in more exposed locations on the periphery of the built up area.

5.0 **Site 98** would also complement the existing isolated housing in the form of three terraces facing onto the A12 opposite the S.L.I.E. Indeed the combination of both **Sites 22 and 98** could in essence provide a loop road system linking onto the A12 which would maximise the development potential in this area without compromising the limits of the overall settlement area.

6.0 The Council predicts that at least 7700 new homes will be needed between 2011 and 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

7.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

8.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its



Housing Strategy, if supported by the LPA.

## 23 - Holly Farm, Wood Lane, Oulton

### Oulton Parish Council (Carolyn Gosling)

- Sites not suitable for development:  
23 Holly Farm, Wood Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

### Suffolk Wildlife Trust (James Meyer)

Sites 18; 23; 51; 53 and 96 are in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

## 24 - Homestead Farm, Ringsfield Road, Beccles

### Nicky Elliott

I have misgivings over the development of this large site, along with sites 156, 43 and 145, as I feel there is no limit to development to the west and south of this area. The sites further east however, are bounded by the Southern Relief Road to the south, and the A145 to the west.

### Paul Leman

This site is not suitable for development. Ringsfield Road & the A145 are heavily congested especially at peak times. Local services such as the Medical Centre are already overstretched. Any housing development should be well away from the town, with its own facilities & good links to main roads.

### Rosemary Shaw

I am writing with reference to sites 145 and 24. The development of these sites would increase traffic on Ringsfield Road, which the proposed new road linking London Road to the Ellough Industrial Estate would not extend to. Traffic from these two sites would go into the town centre and congestion outside both the schools on Ringsfield Road (Sir John Leman High and St Benet's primary) would increase. Ringsfield Rd is also part of the national cycle route network (route 1). If Ringsfield road is developed in this way, the logical corollary will be that pressure will mount for a south-western distributor road to link London Rd with the B1062, whereas the whole purpose of the new southern relief road in Beccles is to channel traffic onto the A146.

The most sustainable sites for development are those which would be served by the new road to the south, namely site numbers 8, 9, 81, 82 and 107 - and this would also apply to sites like number 124. It would also make sense if these sites (8, 9, 81, 82, 107) had good cycle paths and walkways into the centre of Beccles even though they would primarily be served by the new southern relief/distributor road for motor vehicles.



**R Simpson**

My concerns for this site are as follows; it will have a huge impact on small local roads, Ringsfield rd, south Rd and Ashmans Rd. These roads already have extreme congestion problems at busy school run times with added buses for John Lemon. Also a leisure centre at the Lemon. The junction of Ringsfield Rd and St Mary's rd is particularly dangerous as visibility is bad. Also there is no capacity for school expansion including nearby Albert Pye as this has already occurred recently. The surrounding roads are choke points with schools and vast number of cars for M&H plastics. I suggest sites 8,9,81,82 and 62 as these would feed onto the new link road and there is the opportunity to build a new school or reinstated Crowfoot school.

I would like to see this site used for a camping type holiday place; beautiful countryside, easy bike access, good for links to Halesworth would. Or it would make a good nature reserve thus a tourist destination, and great for families.

**Beccles Town Council (C Boyne)**

Whilst the council appreciate the need for development in the area over the next twenty years, it must be handled with great care as the infrastructure in Beccles is at breaking point now, especially the Health Centre. With this in mind, it is felt that any housing development should be restricted to the area to the South West on one or two of the sites numbered 24,43, 108, 145 and 156, as this makes the best use of the existing and planned road infrastructure. However, this area would require a new primary school and a convenience store and other associated infrastructure to service any expansion. In addition, the two small sites in Beccles, numbers 1 and 16 and site number 60 in Worlingham could also be included as sites for development.

**Broads Authority (Natalie Beal)**

Group of sites to the south of Beccles – As they are on rising ground, any development proposals would need to be assessed for potential landscape and visual impacts on the Broads area.

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**25 - Hulver Street, Hulver, Henstead With Hulver Street**

**Nick Carter**

I strongly object to the development of this site. The area lies within the AONB and development of the site would be out of proportion to the size of the village. The B1127 is an increasingly busy road especially since the development of the anaerobic digester, building of the crematorium, growth of the parachuting school and expansion of the industrial site and further residential development would make the road busier (there are no bus links in the village) and more dangerous. There is no mains drainage in the village and the development would add to drainage issues.

**Mrs Moore**

We oppose this site for development of 30 houses as there are no facilities in or near the area and a quiet rural village would be spoilt by over-development.

There are no public buses through the village so all journeys would have to be taken by car to Beccles, Lowestoft or Norwich for shopping, leisure, medical facilities etc



Thirty homes could easily involve 60 vehicles and access onto the busy B1127 would cause a lot of problems.

There are no schools or doctors in the area and not even a village shop.

There is nothing (not even a safe play area) for young children, no pub / entertainment or centre/meeting place for elderly people.

We therefore feel development of 30 houses would be totally out of keeping with the quiet countryside area and have a detrimental impact on the surroundings.

#### **Henstead with Hulver Street Parish Council (John Armstrong)**

The Parish Council considered the questions you asked it to provide information about. They agreed that the proposed sites for possible development were unsuitable in terms of the number of houses projected for the sites. As I explained in my previous response the Councillors did not feel that they could respond to the other questions about jobs and facilities until after the consultations with residents in the development of the neighbourhood plan.

#### **NorCas**

No development of farmland.

### **26 - Jubilee, Green Lane, Reydon**

#### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development? Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane. Could perhaps add some houses near Pitches View.

#### **Ms crook**

I object to 'Jubilee' land being used for development as it runs along, adjacent to Rissemere Lane East, a quiet single track country lane not wide enough for two cars, an AONB area, is part of the cycle route, used by walkers, cyclists, horse riders and children accessing the recreation ground and childrens play area, all needing safety along the lane. This lane has already had several attempts from planning to construct including Pathfinder, relocating Easton Bavents residents and most recently from Global chair components which has been turned down at appeal. Why should up to possibly 36 houses be allowed on the other side of the lane, completely spoiling the very nature of this leafy unspoilt area?

#### **Jim Elmes**

Off Green Lane is the most appropriate.

#### **Mr & Mrs McNally**



We attended the meeting on Tuesday 10 May to view the Waveney Local Plan. We were surprised to see so many homes planned for Reydon. Is there really a need for this amount of extra housing in this area?

We asked the Planning Officer if the necessary infrastructure would be put in place prior to or at the same time the homes would be built. We were shocked to be told that this would not be the case and their remit was just to build houses and there was no link up with any necessary services. We pointed out that there are currently long waiting times for appointments at the Health Centre and treatment times at the James Paget A&E are below targets. The Planning Officer said that shortage of doctors is a nationwide problem and any improvements needed cannot be part of the housing development plan. There also appears to be no firm plans proposed for more school places, jobs, shops, sewage capacity etc. for the 972 homes mentioned.

It would appear that the area will be overdeveloped to provide housing with no thought for the well being of existing or new residents. Surely this cannot be right and we are writing to ask what action you will be taking.

There is also the concern that a lot of the new property will be second homes and holiday lets and wonder if you will be considering adopting the St Ives ruling of not allowing this type of person to purchase new properties. This would make it less attractive to developers to build such large housing developments.

One last point when does a village enlarge so much to qualify to become a town?

#### **Ruth & John Pigneguy**

Many residents have moved here to live in a semi-natural area. These sites look like massive over-development. Second homes need to be controlled so that we can have local full time residents living here.

#### **clive tickner**

Hugely inappropriate area as it now has a only single house and a caravan parking area. The small amount of traffic that the caravan drivers present is often more than sensible for a narrow lane. Most of the land is outside the village limits and is in a sensitive AONB. The quiet nature of this part of Reydon would be totally overwhelmed. 36 homes on such a small space must also conflict with the allowable area per dwelling.

#### **Pippy Tickner**

This land is outside the village perimeter of Reydon and as such is in protected AONB land & in a locally loved area known as Reydon Smere, making it unsuitable for building outside the village boundary.

This privately owned large plot with a family home has a maturing developing woodland planted on it some 15 yrs. It currently has use for a countryside leisure activity of occasional holiday camper van use, max 6 vehicles. which fits happily with the sensitivity of this area.

The plot protrudes hugely into the special area of The Smere & runs beside a designated 'Quiet Lane' surrounded by agricultural fields. Change of use of this agricultural land to building plots (or indeed of the adjacent 2 plots 5 & 38..similarly placed) would set a precedent for change of use land which is given Government protection to be only altered for development on in proven exceptional circumstances. There is no need for such designation as there are other plots identified here between Wangford Rd & Halesworth Rd, as well as land not shown in this area which had been identified & discussed during the Pathfinder project as previously proposed suitable for building.

As the immediate Southwold/ Reydon area is a major tourist area with the majority of ANY new build being snapped up for holiday rental or second home use. Previous attempts to protect new build homes, only to be



purchased by local people, have failed dismally and seen only the developers profit hugely from these developments.

Any proposals for change of use of this protected AONB land would be highly detrimental to this area and not provide affordable housing for the Suffolk area which would need to be more appropriately placed nearer to towns with existing facilities for schools etc & with better transport links for the communities living there.

#### **Reydon Parish Council**

In Reydon, we believe that at Elliott Avenue and off Mount Pleasant there are two small infill sites which could be designated for affordable housing. We believe that the site identified as Jubilee, Green Lane (site 26), adjacent to the site already identified for affordable housing, is suitable for a mixed development of affordable and low cost housing. The site of the temporary pharmacy adjacent to Reydon Health centre should be developed, either for housing or mixed uses. Depending on the density of development, these sites could meet the target. Other potential sites for modest extension of the settlement of the village are the land adjacent to the Crescents (where road layout confirms an earlier intention to extend the development there) and the land on either side of Wangford Road from the existing housing towards the Church. The Parish Council would welcome the opportunity to meet Planning Officers to explore further these potential sites.

#### **Historic England (Debbie Mack)**

Grade II\* Church of St Margaret to West. Limited potential for impact on Listed Building.

#### **Southwold and Reydon Society (Philip O'Hear)**

This site is on the edge of the settlement of Reydon and adjacent to the site in Green Lane already agreed for a small development of affordable housing under the current Rural Exceptions policy (DM22). There are also three houses on the corner of Green lane and Rissemere Lane East which this site surrounds. It is, however, in the open countryside and part of the AONB. Despite this, we believe that this site could be considered for small-scale development, of affordable housing and/or lower cost smaller units of commercial housing. These are the types of housing needed to meet local need and we recognise that modest expansion of the village envelope of Reydon may be needed to develop such housing.

Small-scale development such as this will be adequate to meet the targets for new housing in Southwold and Reydon if the option to concentrate growth in the area in and around Lowestoft is adopted as we have supported elsewhere.

Any development here must be planned carefully to minimise its impact on the visual amenity and environment of the AONB and work will be required on the infrastructure, particularly the sewage system which is at or beyond its capacity in the whole area of Southwold and Reydon but specifically beyond its capacity in this part of Reydon. A footway will also be required on the part of Rissemere Lane which would be developed under this proposal.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 5; 26 and 38 are in close proximity of Benacre to Easton Bavents SPA and Pakefield to Easton Bavents Site of Special Scientific Interest (SSSI). We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the SPA or the SSSI.



## 27 - Land (off) The Loke, Blundeston, Blundeston

### Lisa Doyle

With comment to the option of sites that housing has been proposed for in our village, I seriously think that our small village roads cannot cope with the extra volume of traffic. Sites 42, 27, 129, 29 should definitely be ruled out.

### Lisa Doyle

Sites 27, 129, 49, same main reason of extra traffic as sites mentioned above. Sites 20 and 63 are better situated with access from Flixton Road, which would keep extra vehicles away from village, but still too many houses proposed for sites, these could potentially create an extra 600 vehicles on small roads.

### andy Howlett

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

### John Mitchell

Site 27 suggested for 5 houses appears to extend into open countryside. Market Lane is narrow at this point and on-street parking here is already causing access and visibility problems.

### Rosalind Roots

Sites 129 and 27 are close to fields and hedges where wildlife would be threatened. We are presently blessed with an abundance of wildlife, that I have recently been able to photograph, like hares, rare butterflies, deer, and varieties of birds including species on the decline like skylarks and cuckoo. It is a peaceful area enjoyed by the villagers and it is hoped that these sites will not be chosen.

### N/A (Tim caley)



This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are constantly clogged with school traffic.

## 29 - Land adjacent Millennium Green, Church Road, Blundeston

### simon bunting

not adequate infrastructure in village to support extra housing at this level

### Mr Peter Carrier

Holy unsuitable sites for such massive builds, there is inadequate infrastructure (sewage, utilities and roads) such a project would ruin the outlying area, in addition This would take away good agricultural land growing food, a consideration for lowering the imports and potential local economy issues with the EU.

### Lisa Doylend

With comment to the option of sites that housing has been proposed for in our village, I seriously think that our small village roads cannot cope with the extra volume of traffic. Sites 42, 27, 129, 29 should definitely be ruled out.

Site 29 – Church Road and Pound Lane cannot cope with the school traffic, let alone an extra 50 cars (2 per household).

### Terry Gooding

Blundeston cannot support a development of this size, there simply isn't the infrastructure to justify it. Destruction of greenfield sites, over subscription of essential services such as schools and doctors, the fact that roads will become busier and more dangerous as a result. Increased risks of flooding due to concrete coverage.

As a wider concern I do not see plans for new hospitals, fire stations, police stations, doctors, school or public transport

Why is the redevelopment of the prison site not included here which in itself will contain at least 100 houses - will this offset your need to build all over Blundeston & ruin yet another beautiful village. People live here to escape the sprawl not live on a housing estate.

I appreciate that housing is required but not on this scale and any planning application of this nature will be opposed by all who live there.



**andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

**Michaela Jary**

I would like to object to this application on the grounds that it will severely damage the habitats for a number of rare and endangered species of wildlife, as well as massively affecting the character of one of the most historic buildings in our region.

We live in the Rookery, surrounded on two sides by this piece of land, and the literary birthplace of David Copperfield and once visited by Charles Dickens. The house's historical character will be all but destroyed by a large development alongside, blocking all views of the church. Houses alongside would be looking directly into our property and ruining our privacy.

Since we have lived in the Rookery we have been inundated with beautiful wildlife which will disappear with any development. Over the ten years we have lived here, we have found two types of newts, a number of toads, frogs, snakes, slow-worms as well as a variety of small mammals such as mice, shrews and rabbits. The land in question is a nightly hunting site for any number of bats, and a pair of stunning Barn Owls. Numerous other birds are always present and we have even had larger mammals such as Muntjak deer, stoats, weasels and foxes sighted.

All of this will be lost with a development of this scale. On top of this, the school cannot deal with the extra pupils or the extra traffic which is already at unsafe levels and will almost certainly lead to a major accident in the very near future.

This site is unsuitable in many ways and should not be considered for development.

**John Mitchell**

Site 29 suggested for 25 houses would appear to have a problematic access. It is difficult to envisage where an access could be formed without destroying the leafy nature of these roads. Both Pound Lane and Church Road are narrow, and visibility is very restricted. On street parking has added to this problem, particularly given the LPA's decision last year to permit further properties, some effectively without on-site car-parking. On-street parking associated with the school extends the entire length of Church Road almost to the junction with Short Road/The Street. It is hard to imagine how this site could be accessed until such time as adequate alternative parking provision is made at the school.



**Bruce Rayner**

Site 29

Plan indicates that housing demand may exceed supply and that there may be a requirement for a further 8,000 homes before 2036. Before large areas of the locality are built upon, are the Council certain of the requirement? It would seem irresponsible to build numerous 'white elephants'. Is this not merely a function of the Government's policy to build a specified number of homes but without certainty of the need in this area?

Plan indicates that there are already 3,141 new homes in the pipeline plus a further 633 anticipated. That would seem to be enough for the present until precise requirements are known.

- a) Most employment is South of the river. Blundeston is to the North.
- b) Transport in Blundeston is poor, there is bad road access and it is dangerous even with low traffic. Sites 164-165 are better served.
- c) Site does not benefit from obvious safe and easy access.
- d) Why spoil such a beautiful area, enjoyed by tourists, local runners and cyclists? Further traffic would be a hazard.
- e) As a Chartered Surveyor, your numbers per hectare do not appear to be accurate.
- f) There are no amenities in Blundeston, not even a village shop for milk, bread, etc.
- g) There is no regular bus service. Increased traffic to get in and out of the village is an environmental issue. Areas identified South of Lowestoft are already served by public transport and allocated safe cycle routes.
- h) Properties in Blundeston are mature. New homes next to what are already new homes in Carlton Colville would be much better.
- i) By publishing this document, you seem to have added planning blight to nearly all of the homes surrounding Lowestoft for no apparent reason.
- j) Building 456 new homes in Blundeston would almost double the population of the village, surely not desirable, sensible or necessary.
- k) Current essential services / supply are limited. At certain times of the day, water pressure is already very low.
- l) Risk of flooding through rainfall if a concrete jungle is built - sewers can't cope.
- m) Broadband is slow and mobile phone signal is bad.
- n) Development on the prison site is already ample for the village to cope with.
- o) Blundeston is inhabited by lots of wildlife - there are owls, newts, hedgehogs, etc. I've heard baby owls calling to their parents from our house. Some of these species are becoming rare. Why destroy these areas when there are alternatives?

It makes far more sense to build on the sites identified in Carlton Colville. The proper infrastructure could be put in place in one designated area. Why spoil beautiful landscapes, upset huge numbers of the local population and potentially decrease tourism and enjoyment of the areas outlined.



**Pamela Robertson**

Blundeston already has inadequate infrastructure - there are problems with the sewer, pipes being too small - problems with water drainage - parking problems in the street.

Our village has always been a peaceful tranquil place where one can talk a walk and hear birdsong and see the occasional deer and small animals on the fields - this is what most of the residents enjoy and the general feeling of the villagers is that if all the proposed building takes place it will be detrimental to this area.

I have lived in Blundeston for many years and within my lifetime much infill building has taken place - there are now to be additional houses on the prison site which will mean

additional traffic to the school.

I would also like to include sites 42, 49, 63 and 129 with my comments

**Gary Shilling**

As outlined in my local village news letter (Blundeston) I would like to register my rejection to any large scale building (sites 29, 42, 63 & 129), in my opinion the village neither has or has the ability to enable a construction on these scales. We have neither the roads to handle the increased traffic ( roads not in a good state of repair or wide enough, concerns for children around the village as no road has a cycle lane or footpath), the school could not accommodate an increase, no local facilities and simply no need. It is nice to remain a village and not end up becoming part of oil ton broad as outlined village has done! I have no objection to small (under 10) development that allow the village to absorb the impact that it would have. I understand this is a biased view, but like everybody whom lives here, we picked it because it is a small village. This is mind with the development on the old prison site and other sites (that have been constructed and are just footings in the ground) the usual infill sites have been enough. The development on the prison will increase the traffic in and out of the village hugely as most households have two cars if not more, and that with children staying at home for longer traffic will increase without further building. T can already be seen throughout Lowestoft, Blundeston aside people are increasing parking on the road instead of using garages of changing front gardens to off road parking which should be implemented to remove cars parked on roads to increase road safety. Sorry didn't mean to turn into a rant.

**Gary Shilling**

Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians),



**Mr and Mrs D Tantony**

SITE 29

In response to your Waveney local plan and how it affects Blundeston Area.

As attached your plan document;

The heading should have read. **How to devastate Blundeston a rural village.**

**We totally object to all the proposed possible options being submitted for future planning.**

**The proposed siting of the development is particularly ill-considered: Some are on a greenfield site used by many villagers and tourists for recreation and walking dogs, and building here would both diminish the striking view of the village.**

**Facilities Services and infrastructure, we have one Public House, One School, Monday to Friday only, busses have been cut to 3 traveling to Lowestoft, and 3 to Lound, off which only 2 go to James Paget Hospital that's our services.**

**All roads and footpath are very much in need of upgrading, as some have none at all?**

**452 houses proposed 2 cars per house hold, meaning increase of 904 or more cars in the village, as we have no other means of transport for going to work or general shopping. The impact on this village would be devastating. Knowing that we speak for the majority of the people living in Blundeston.**

**As your comments and recommendation below would agree we us and nothing have change to date.**

Small Bere is a dispersed settlement where development proposals should be considered very carefully: infilling could ruin the character of the village while estate development would overwhelm it. The protection of Small Bere's visual historic and archaeological qualities should be supported by Planning Policy's.

**Issue January 2010, Waveney Local Development framework. As stated in your Documentation,**

All thou referent numbers not matching your new site referent number, some of these sites are reference in this document, copied and paste.

**Site: 007 Land at Pound Lane/Church Road, Blundeston**

**Respondent: THE/569/1787**

**Representation:** These representations in respect of the Waveney Local Development Framework Site Specific Allocations Development Plan Document, Lowestoft Area Section are submitted on behalf of our client, The Diocese of Norwich. The Council will be aware from previous submissions that the Diocese of Norwich are the owners of Site 007 - Land at Pound Lane / Church Road, Blundeston. The Core Strategy confirms that some housing development should take place at the Larger Villages. The Council consider that sufficient brownfield land has been identified to accommodate the proposed levels of housing development at the larger villages. However, housing requirements are minimum requirements and that the site presents the opportunity to provide development, which could support or provide new services in a location, which is accessible by public, transport and therefore to higher order services in Lowestoft. We therefore consider that provided that development of the site can address all site-specific issues that have been identified, there is no reason as to why the site could not be allocated for housing development within the Submission version of the Site Allocations document.

In terms of site-specific issues, the Council's analysis identifies that there are significant landscape and building



conservation considerations, which apply to the site. We are of the view that development of the site should not be ruled out at this stage, without having undertaken further analysis of these issues. It may be possible to address these issues through sensitive development of the site. Sensitive development of the site might also ensure a scale of development to which the Highways Agency have no objection (Please see representation on file for full comments). **Assessment:** While it is agreed that sensitive design and layout of new development can overcome impacts on the historic landscape, site 007 is located on greenfield land beyond the built up area and therefore contrary to the aims of Core Strategy. Development of this scale is inappropriate in a village where there are few services and facilities to sustain the community.

**Recommendation for Site No: 007** Site 007 is a greenfield site located beyond the built up area of the village and therefore does not comply with policy CS01 and CS11 of the Core Strategy. Sufficient brownfield land has been identified in more sustainable locations in the District. It is considered that development of this scale is inappropriate in a village where there are few services and facilities to sustain the community. In line with previous recommendations the site will not be taken forward.

**Mr and Mrs D Tantony**

SITE 29

In response to your Waveney local plan and how it affects Blundeston Area.

As attached your plan document;

The heading should have read. **How to devastate Blundeston a rural village.**

**We totally object to all the proposed possible options being submitted for future planning.**

**The proposed siting of the development is particularly ill-considered: Some are on a greenfield site used by many villagers and tourists for recreation and walking dogs, and building here would both diminish the striking view of the village.**

**Facilities Services and infrastructure, we have one Public House, One School, Monday to Friday only, busses have been cut to 3 traveling to Lowestoft, and 3 to Lound, off which only 2 go to James Paget Hospital that's our services.**

**All roads and footpath are very much in need of upgrading, as some have none at all?**

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Small Bere is a dispersed settlement where development proposals should be considered very carefully: infilling could ruin the character of the village while estate development would overwhelm it. The protection of Small Bere's visual historic and archaeological qualities should be supported by Planning Policy's.

**Issue January 2010, Waveney Local Development framework. As stated in your Documentation,**

All thou referent numbers not matching your new site referent number, some of these sites are reference in this document, copied and paste.

**Site: 005 Market Lane, Blundeston**



**Respondent: WEL/436/1004**

**Representation:** As with site 006 we feel that it is item of contention that this site is noted once again as Greenfield Land. Surely the documented past use of the land confirms that it is indeed a Brownfield Site. Please give further consideration be given to both sites and at the very least our comments are noted for consideration for the future should 1st East fail to deliver the housing that is being forecast. **Assessment:** Comments noted. The site is not consistent with the Core Strategy. The road network is poor and facilities within the village are inadequate to support growth at this scale.

**Recommendation for Site No: 005** Site 005 is located on land beyond the built up area of Blundeston. While some development will be permitted in the larger villages, location of new housing will be restricted to the main towns. Blundeston has good access to services in Lowestoft but the village has very limited facilities and poor road network for development of this scale. Allocation of this site would be contrary to Core Strategy policies CS01 and CS11 relating to sustainable development. As already recommended the site will not be taken forward.

**Respondent: WEL/436/1003**

**Representation:** It was with interest to note that this site was referred to as Greenfield land once again, as it was quite clearly listed as Brownfield when planning was approved under the Rural Exceptions Policy. We would ask you to consider the remaining parcel of the site as a preferred option with this in mind. We would ask that our comments are noted for consideration for the future should 1st East fail to deliver the housing that is being forecast. **Assessment:** Comments noted. The site already has planning permission for 10 affordable dwellings. As this site is located beyond the built up area. Any additional need for affordable housing could be addressed through rural exceptions policies. Therefore there is no need to progress this site further.

**Recommendation for Site No: 006** As with Site 005, site 006 are located on land beyond the built up area of Blundeston. While some development will be permitted in the larger villages, location of new housing will be restricted to the main towns. Blundeston has good access to services in Lowestoft but the village has very limited facilities and poor road network for development of this scale. Allocation of this site would be contrary to Core Strategy policies CS01 and CS11 relating to sustainable development. Any proposals for affordable housing could be considered under the rural exceptions policy. As already recommended the site will not be taken forward.

**Historic England (Debbie Mack)**

Church of St Mary grade I, Pound grade II and the Rookery grade II. Potential impact on setting of high grade Listed Building and other listed buildings.

**Metka UK Ltd**

As the owner of The Rookery, Pound Lane, Blundeston I would like to strongly object to the inclusion of the above site in the Local Plan. My property was formerly the parish Rectory and Parsonage associated with St Mary's Church in Blundeston, owned by the church the curtilage was parcelled with plot 29 and another paddock alongside. It was split into three in the 1970's, the church retained plot 29, the paddock and house were sold separately and I purchased the house in 2006.

The Rookery is unique in its setting because it is Grade II listed by English Heritage as the birthplace of Charles Dickens' character David Copperfield in the book of the same name. Blundeston's main claim to fame is this very fact. Not only is The Rookery accurately described in the first two chapters of the book when the story takes place in the village, but also the views around and the particular views of the church from the house windows are detailed famously. All of these would be compromised by development on plot 29 severely damaging this very important local Heritage Asset. Many local roads, businesses, buildings and societies take



their very name from the historical connection and importance of The Rookery, Dickens and David Copperfield and development of plot29 would damage their origin and severely restrict Waveney's historic environment.

I would also argue that this part of Blundeston is particularly unsuitable for further development for the following reasons:

1. It is greenbelt land rather than brownfield.
2. Current development is limited around the site and services are poor.
3. Proximity to the Millennium Green would compromise the ecological and aesthetic environment.
4. Already the Blundeston Primary School is full to overflowing and each day at peak times car parking along Church Road, Pound Lane and Dickens Court is illegal and dangerous. It is a matter of time before a child is killed, and extra development on this road will only make demand higher and traffic even busier. Parents speed up Pound Lane at the moment so increased housing will only increase traffic.

I am not against all potential development in Blundeston because there are merits to sites 27/129 and 42 which are nearer to the amenities of the village, and also the main A12. Sites 20, 49 and 63 are too far from anything to be seriously considered and would constitute massive detriment to the greenbelt village is included in the plan. All these proposed sites are greenfield sites where the most obvious candidate nearby for any development would have to be the former HMP Blundeston, which should be prioritised over all others in it service provision, brownfield condition, low environmental and ecological impact, and need for an alternative use.

However there is much argument to keep all development away from Blundeston because it should not be categorised as a 'larger village' along with Corton, Kessingland and others.

1. Blundeston is not as close to the main conurbation as the other villages.
2. Blundeston does not have enough amenities to qualify as a 'larger village' - no shops, no post office, no banks, one pub.
3. Services to the village are too poor to provide for a large increase in development.
4. Access and roads are particularly poor in, around and to the village.
5. Parking is usually on-road making access even more difficult throughout.

**N/A (Tim caley)**

This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are



constantly clogged with school traffic.

### 30 - Land adjacent to Elms Lane, Wangford with Henham

#### Mr Baker

We feel this site is quite unsuitable for the proposed housing:

access is challenging from minor roads, a recently laid water main to supply Southwold with water transects the site and the aesthetics of this side of the village would also be compromised. The housing would significantly detract from the current properties as well as considerably increasing the traffic on roads quite unsuitable

#### Graham Scriven

Is the the best site for new housing in Wangford?

Is the current sewage system capable of supporting 130 new houses?

Why build houses outside the village envelope next to the A12 when other possible land is closer to the centre of the village. Consider south of Hill Road and behind existing houses in Norfolk Road. This would allow access for parking to the rear of those properties which would improve the traffic situation on Norfolk Road.

Would a dangerous access need to be created on the the A12?

How could any new housing be protected from becoming second homes?

#### Lloyd Scriven

This proposed development would be totally inappropriate for the village of Wangford for the following reasons:

The proposed site in in an AONB

The proposed site is completely outside the existing current physical village limits, even if the village limits were to be more loosely defined, the vast majority of this site would still be well outside the village limits.

The existing local plan suggests 'small' amounts of development – this proposal is not in any way small

The infrastructure in the village does not support this level of development

This is a greenfield site – preference should be given to brownfield sites

The road network around this site cannot support this proposed development

#### Historic England (Debbie Mack)



Elm Farm house and Malting, both grade II listed buildings to south of site. Potential impact on setting of listed building.

### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
- ▶ 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane
- ▶ 102 - Land south of Sparrowhawk Road
- ▶ 13 - Fairview Farm, Norwich Road
- ▶ 30 - Land adjacent to Elms Lane

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

### **Appendices - National Grid Assets**

Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)



### **31 - Land adjacent to Little Priory, Church Street, Wangford**

#### **Historic England (Debbie Mack)**

Located in the Conservation Area, adjacent to grade I listed Church of St Peter and St Paul as well as a range of grade II listed buildings including Little Priory, former Coach House, The Vicarage, the Well Cottage, Baxter House and a number of other properties to the north. Potential impact on Conservation Area and high grade and other listed buildings.

### **32 - Land adjacent to The Oaks, Beccles Road, Holton**

#### **Halesworth Town Council (N Rees)**

Sites 32, 103 and 148 are Holton.

#### **Historic England (Debbie Mack)**

Pastures Farm grade II listed to north. Potential impact on setting of listed building.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 32 is well outside any village envelopment on a busy, narrow road with no natural links to other development of significance.

### **33 - Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft**

#### **Raymond Adcock**

I wish to comment on the land off Leisure Way where 22 houses are planned. I consider this area to be unsuitable for 22 houses. The area of land adjoins the Gunton Meadow Nature Reserve and the pond by the development area has always been a breeding ground for great crested newts. On looking at Natural England's web site, areas that are known to contain the great crested newts have to have a buffer from that area to the nearest building. This does in fact, limit the area of land for building quite considerably.

Also there is a wonderful oak tree on that piece of land. I am not aware if this tree has a TPO placed on it, but if not it should be protected. It would be criminal if this tree was taken down. This again limits the area of land for building.

If one looks at the situation of this land, it really is not conducive for housing.

#### **Gunton Woodland Community Project**

I am writing on behalf of the Gunton Woodland Community Project. We would like to comment on an item in



your “Potential Sites for Development” listing in which you have included Site 33 (0.72ha) with a theoretical potential for 22 dwellings. We do not believe this is a suitable site for a dense housing development and set out below our reasons for this.

Originally, this site was part of the land to the South of Leisure Way that had been purchased by Tesco in order to construct a Petrol Filling Station. At a public meeting in 2000, GWCP urged Tesco to consider releasing some of the remaining land for use as a Nature Reserve and, after 2 years of negotiations with continuous involvement of GWCP, Tesco agreed to this proposal. Another 4 years passed before all the legal agreements were finally in place and in 2006 Suffolk Wildlife Trust were able to take ownership of more than half of the land to establish the Gunton Meadow Nature Reserve, see attached map. Subsequently, Planning Application (DC/11/1376/FUL) for a Nursing Home on Site 33 was submitted by Frostdrive & Brookdale House. It was approved in 2012, but the permission has now expired.

As is evident from the map, Site 33 forms a critical link in the “green belt” surrounding North Lowestoft that stretches from the beach all the way through the Denes, Dip Farm golf course, Gunton Wood, Pleasurewood Hills meadow, Gunton Meadow Nature Reserve to Foxburrow Wood and thence to the West of the A12. There is an increasing understanding of the importance of maintaining such continuous corridors for the benefit of wildlife. Moreover, immediately adjacent to Site 33, there is a large natural pond which is well known as a great-crested newt habitat. Indeed, the presence of G C newts was responsible for delaying the construction of the Travelodge hotel for several months while mitigation procedures were implemented.

Gunton Meadow Nature Reserve is an important asset to the area with its wide variation of habitat, two ponds, interesting ground flora and a great deal of bird life. It is well maintained by Suffolk Wildlife Trust, supported by an enthusiastic team of volunteers and, an ideal outcome for Site 33 would be to incorporate it as a part of the Reserve. If the environmental case for this was presented to the Owners of the land we wonder whether they could be persuaded to follow the precedent set by Tesco with a demonstration of philanthropy by gifting the land to Suffolk Wildlife Trust for the benefit of residents and visitors to Lowestoft.

Of course, this may be wishful thinking and if the Owners insist on a financial return we believe it might still be possible to find a solution. If a suitable Developer could be found, one way forward might be to create an “adventure playground” attraction for children based on outdoor activities. Such a facility may prove to be very successful financially. Pleasurewood Hills is already a family destination, the Harvester Restaurant and Travelodge Hotel are close by so there are good prospects for high numbers of visitors. Even with a small refreshment cafe and provision for car parking it should still be possible to plant a significant number of trees and shrubs across the site in order to preserve its green credentials.

There may be other acceptable uses for the site, any of which would be preferred over tightly packed houses and/or flats with virtually no green spaces.

We are copying this letter to Suffolk Wildlife Trust in case they wish to express their views on this proposal.

## **Lawson Planning Partnership Ltd (Jenny Moor)**

### **1. Introduction**

1.1 This Statement sets out representations made by Lawson Planning Partnership Limited on behalf of our Client and site owner Frostdrive Limited, in relation to the development of land south of Leisure Way, Lowestoft for residential purposes for approximately 20 homes. This Statement has been produced in response to both the 'Options for the new Waveney Local Plan' (April 2016) and the latest 'Call for Sites' (April 2016, following the previous Call for Sites exercise in Autumn 2015).

1.2 In January 2016 the site was submitted to Waveney District Council as part of the previous 'Call for Sites' exercise. The Council has now published all of the sites that were submitted for public comment, as part of the 'Options' for the new Waveney Local Plan. The site is included within the Options for the new Waveney Local



Plan as 'Site Number 33 - Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft'.

1.3 As part of this consultation, Waveney District Council are undertaking a further Call for Sites exercise. Our client's land south of Leisure Way has been resubmitted as part of this latest consultation, with further details contained within this Statement to reiterate the suitability of this sustainable site for residential development.

1.4 Representations are also made relating to a number of the questions set out in the 'Help plan our future - Options for the new Waveney Local Plan' consultation document. These are set out at Section 5 of this Statement. Responses have also been uploaded to the Waveney Consultation Portal.

1.5 This Statement provides detail to the Council on why the site south of Leisure Way should be allocated for residential development.

1.6 In summary, the proposed allocation of land south of Leisure Way, Lowestoft represents a suitable and sustainable location to accommodate a small but important residential development that would assist the Council in meeting its overall housing requirement for the District, including affordable housing, for Lowestoft in particular.

1.7 It is therefore requested that the Council takes into consideration our comments and ultimately includes the site as a housing allocation in the emerging Local Plan. It is understood from the Council's Local Development Scheme (March 2016) that the new Local Plan is currently anticipated to be Adopted in May 2018. The site is available for development now, and prior to the Adoption of the Plan, and therefore the site's suitability and deliverability for housing development should be recognised in the early stages of the plan preparation process.

## **2. Background to the Site**

2.1 The site comprises land to the south of Leisure Way, Lowestoft, as shown on the Site Location Plan at Appendix 1. The site covers an area of approximately 0.8 hectares (2 acres), comprising a relatively flat and open area of vacant land.

2.2 The site is conveniently located to the north of Lowestoft, approximately 2 miles (3.2km) from the town centre, where a significant number of shops, services and employment opportunities are located. Lowestoft is the main town in the District and has historically been the focus for growth.

2.3 The site is not currently identified within the 'physical limits' for Lowestoft, as defined by the Adopted Proposals Map, and is therefore considered to be located within the 'countryside' in policy terms. However, the site which was previously consented for a leisure centre and an 80-bed residential care home, clearly forms part of the existing planned built up area. It effectively comprises a remaining vacant and unused parcel of land, with Tesco Supermarket located to the north beyond Leisure Way, Travelodge Hotel and a Public House located to the west and designated open space located to the south and east. The site essentially relates to the urban area. Consequently, the existing physical limits boundary is out-of-date and requires updating in this regard.

2.4 The site is located within close proximity to existing and established residential areas to the west and south of the site.

2.5 As explained above, the principle of development on the site has been established with planning permission granted for an 80 bed care home in 2012. The permission was not implemented although recognised the appropriateness of the site for development. Prior to the care home consent, planning permission was also granted in 2006 for a leisure development on the site as part of the wider Tesco retail complex.

2.6 In terms of flood risk, the site is entirely contained within Flood Zone I and is therefore not considered to be at risk from surface water flooding. An appropriate drainage strategy will be incorporated into any



development proposal for the site.

2.7 The site contains no known heritage assets, ecological designations or other physical constraints that would prevent development. There is an existing gas main running north-south in the western part of the site and a tree protected by a Tree Preservation Order (TPO). Any development on the site could be adequately designed around the gas main and TPO.

2.8 The site is situated in a sustainable location with key services and facilities located within convenient walking distance, as identified on the Facilities Map at Appendix 2. The site adjoins existing designated open space to the south, which provides a pedestrian right of way directly to Gunton Primary School. The accessibility of the site to many local services is further demonstrated in the table below. There is a good and accessible public footpath network in the vicinity of the site and Leisure Way links to a national cycle route. The site is well-linked to Lowestoft Town Centre which is located 2 miles to the south.

#### **Table showing access to key facilities from the site**

Doctors Surgery, Alexandra Road NR32 1PL 2.2 miles (3.5km)  
Lowestoft Hospital, Tennyson Road NR32 4AT 2.2 miles (3.5km)  
Dental Practice John G Plummer & Associates, Meadow Road, Oulton NR32 3AZ 1.5 miles (2.4km)  
Post Office 65-67 Hollingsworth Road NR32 4AT 1.1 miles (1.8km)  
Tesco Superstore Leisure Way NR32 4TZ 0.1 mile (0.2km)  
The Potters Kiln Public House, Leisure Way NR32 4TZ 0.1 mile (0.2km)  
Gunton Primary Academy School, Gainsborough Drive NR32 4LZ 0.25 miles (0.4km)  
The Benjamin Britten High School, Blyford Road NR32 4PZ 0.8 miles (1.3km)  
Lowestoft North Quay Retail Park, Peto Way NR32 2ED 2.3 miles (3.7km)  
Waterlane Leisure Centre, Water Lane NR32 2NH 1.7 miles (2.7km)

2.9 All the key services and facilities are accessible via a regular public transport bus network (with the exception of Gunton Primary School, although it is expected that this would be accessed by walking or cycling due to its close proximity to the site). The site is well connected to existing cycle routes and all the identified key facilities are within cycling distance. A significant number of the key facilities are also within reasonable walking distance of the site. The site is clearly sustainably located.

2.10 There are bus stops located directly opposite the site on Leisure Way. A number of regular services are provided to Lowestoft Town Centre, Southwold, Great Yarmouth, Norwich and Martham. There is also a more limited weekday bus service running to the James Paget Accident and Emergency Hospital.

2.11 In terms of rail provision, Oulton Broad North Station is 2.4 miles and Lowestoft Train Station is 3 miles from the site. Rail links are provided to Norwich and Ipswich, where connecting services are provided to destinations further afield such as central London. There is a regular bus service from Leisure Way to Lowestoft Train Station.

2.12 In summary, the site forms an integral part of the established built up area on the edge of north Lowestoft, with excellent pedestrian, cycle and public transport links to nearby shops and other key community services. Therefore, residential development in this location would represent a suitable and compatible land use.

### **3. Development Proposals**

3.1 As explained in Section 2, the site provides the opportunity to deliver much needed housing on a vacant development site within a sustainable location, as part of a logical extension to this part of the town.

3.2 Housing market advice has been sought and the client's intention is to bring forward a housing development within the next 12 months. A consultant team has been appointed to undertake the technical



work to support a related planning application.

3.3 The site is suitable for housing and is capable of delivering approximately 20 new homes. The proposed development density would be compatible within the existing prevailing residential pattern within the area. Development of the site would be compatible with the area and would not have a detrimental impact on the amenity of any neighbouring properties. The site is well located to promote healthy living and provides good access to open space benefiting from its proximity to designated open space to the east and south.

3.4 The site is solely owned by Frostdrive Ltd and is available for development within the short term. Housing development could therefore be delivered within the first five-year period. In summary, the land at Leisure Way is an available, developable and deliverable housing site, representing sustainable development.

#### **4. Call for Sites Pro-Forma**

4.1 To accompany these Representations a further 'Call for Sites' pro-forma has been completed and is attached at Appendix 3.

#### **Potential Land for Development - North Lowestoft Area**

5.37 Our client's site is included as potential land for development in the North Lowestoft Area and is identified as Site 33 on the Map at page 47 of the consultation document.

5.38 It is clear from the map that there is an absence of sites within the proximity of our client's site, particularly to the south towards Lowestoft town centre. This indicates that there is a lack of other suitable sites for development within the area and as such the land to the south of Leisure Way is sequentially well located. Our client's site is very well related to the existing urban area and should be allocated for residential development in the emerging Local Plan.

#### **Sustainability Appraisal**

5.39 As part of the Evidence Base to the emerging Waveney Local Plan, the Council have undertaken, and published as part of the consultation, their 'Initial Sustainability Appraisal of Emerging Options'. This appraises each of the sites previously submitted to the Council, including our client's site at land south of Leisure Way. The site is referred to in the Sustainability Appraisal as 'Site Option: 33 Land adjacent to Travelodge Hotel, Leisure Way, Lowestoft'.

5.40 The assessment of the site demonstrates that the site would largely have either positive effects or no effect, when considered against the different sustainability objectives, demonstrating the site's high sustainability credentials.

5.41 However, it is considered that some of the comments made are inaccurate or incomplete. It is noted that Sustainability Objective 9 'to conserve and enhance the quality and distinctiveness of landscapes and townscapes' is indicated to have a negative effect. It is stated that the development could look imposing and be poorly related to existing housing, and be out of character within the townscape of the area. We entirely disagree with this view and when considering Objective 9, it appears that the Council have not given consideration to the established principle of residential use on the site through the granting of planning permission for the 80-bed care home and the leisure related development as part of the wider retail complex associated with the Tesco superstore. The site is well related to the urban area and it is requested that the Council re-consider their response to Objective 9.

5.42 Sustainability Objective 10 'to reduce contributions to climate change and mitigate effects' has also recorded a negative effect. However, whilst the sustainability of the site in relation to cycling is recognised, there are also a number of key services and facilities, such as shops and a primary school, within walking distance of the site and there is a regular bus service operating opposite the site from Leisure Way. The accessibility of the site to footpaths and the existing bus network should also be recognised by the Council as



they also reduce contributions to climate change.

5.43 Sustainability Objective 11 'to conserve natural resources' states that the site would have a negative effect because it is undeveloped greenfield land. Whilst the site does comprise greenfield land, the site is a sustainable and suitable site for residential development located within the urban area, which has previously been granted planning permission for residential and leisure developments.

5.44 Sustainability Objective 17 is to 'encourage efficient patterns of movement in support of economic growth'. The Council's comments refer to the site having poor accessibility to employment areas. The site is approximately 2 miles to the north of Lowestoft Town Centre where there are a wide range of employment opportunities. The site is sequentially very well located to the town centre and the existing bus network provides regular links and good accessibility to the employment opportunities located there.

## **6. Summary and Conclusions**

6.1 These representations respond to the Waveney District Council 'Options for the New Waveney Local Plan' Consultation and demonstrate that the site comprising land south of Leisure Way, Lowestoft represents a suitable, accessible, available and deliverable housing allocation within a sustainable location.

6.2 The site is capable of delivering a relatively small (approximately 20 units), but valuable contribution to the requirement for market and affordable housing within the District and could be delivered within the first five years of the Local Plan period.

6.3 The site comprises currently vacant land which benefits from expired planning permissions for a residential care home development and could be put to a more beneficial use following a Local Plan housing allocation. A leisure based planning application was also approved for the site which did not come forward. However, the principle of built development on the site has therefore been clearly established.

6.4 There are a lack of suitable sites for development between our client's land and Lowestoft Town Centre and the land is sequentially well located. This is a sustainable site situated in close proximity to key services and facilities that can be accessed by foot, cycle and public transport. There are positive environmental, social and economic benefits associated with the redevelopment of the site for housing which justify its inclusion as an allocation for much needed housing in the emerging Waveney Local Plan. It is therefore requested that the site is allocated for a modest residential development of approximately 20 dwellings.

6.5 It is trusted that the comments made within these representations will be taken into consideration in the preparation and drafting of the next stages of the emerging Local Plan.

(Attached: Site location plan, facilities map, updated call for sites pro forma)

### **Lawson Planning Partnership Ltd (Jenny Moor)**

Lawson Planning Partnership Ltd's Statement dated June 2016 should be referred to for full details relating to the suitability of Site 33 for allocation for residential development for approximately 20 new homes. The site is also referred to as 'Land south of Leisure Way'.

Site 33 is conveniently located to the north of Lowestoft, approximately 2 miles (3.2km) from the town centre, where a significant number of shops, services and employment opportunities are located. Lowestoft is the main town in the District and has historically been the focus for growth.

The site is not currently identified within the 'physical limits' for Lowestoft, as defined by the Adopted Proposals Map, and is therefore considered to be located within the 'countryside' in policy terms. However, the site which was previously consented for a leisure centre and an 80-bed residential care home, clearly forms part of the existing planned built up area. It effectively comprises a remaining vacant and unused parcel of land, with Tesco Supermarket located to the north beyond Leisure Way, Travelodge Hotel and a Public



House located to the west and designated open space located to the south and east. The site essentially relates to the urban area. Consequently, the existing physical limits boundary is out-of-date and requires updating in this regard.

The site is located within close proximity to existing and established residential areas to the west and south of the site.

The principle of development on the site has been established with planning permission granted for an 80 bed care home in 2012. The permission was not implemented although recognised the appropriateness of the site for development. Prior to the care home consent, planning permission was also granted in 2006 for a leisure development on the site as part of the wider Tesco retail complex.

In terms of flood risk, the site is entirely contained within Flood Zone 1 and is therefore not considered to be at risk from surface water flooding. An appropriate drainage strategy will be incorporated into any development proposal for the site.

The site contains no known heritage assets, ecological designations or other physical constraints that would prevent development. There is an existing gas main running north-south in the western part of the site and a tree protected by a Tree Preservation Order (TPO). Any development on the site could be adequately designed around the gas main and TPO.

All the key services and facilities are accessible via a regular public transport bus network (with the exception of Gunton Primary School, although it is expected that this would be accessed by walking or cycling due to its close proximity to the site). The site is well connected to existing cycle routes and all the identified key facilities are within cycling distance. A significant number of the key facilities are also within reasonable walking distance of the site. The site is clearly sustainably located.

There are bus stops located directly opposite the site on Leisure Way. A number of regular services are provided to Lowestoft Town Centre, Southwold, Great Yarmouth, Norwich and Martham. There is also a more limited weekday bus service running to the James Paget Accident and Emergency Hospital.

In terms of rail provision, Oulton Broad North Station is 2.4 miles and Lowestoft Train Station is 3 miles, from the site. Rail links are provided to Norwich and Ipswich, where connecting services are provided to destinations further afield such as central London. There is a regular bus service from Leisure Way to Lowestoft Train Station.

In summary, the site forms an integral part of the established built up area on the edge of north Lowestoft, with excellent pedestrian, cycle and public transport links to nearby shops and other key community services. Therefore, residential development in this location would represent a suitable and compatible land use.

### **Suffolk Wildlife Trust (James Meyer)**

Site 33 is adjacent to Gunton Meadow nature reserve, which is owned and managed by Suffolk Wildlife Trust, supported by local volunteers, the reserve supports a variety of protected species and Priority habitats and species. Site 33 has previously had consent for built development (a care home) and a number of ecological issues have arisen as the result of site clearance that has previously occurred in relation to this. It is noted that the site is now proposed for allocation for residential development, with an indicative density of 22 dwellings. Gunton Meadow is part of a network of small wildlife rich habitats in north Lowestoft which form an important ecological network in the area. Whilst it is understood that some form of development has previously been considered acceptable on this site, we do not consider that residential development of the density identified in the Local Plan consultation is appropriate. Preferably, the site should not be allocated for any built development. However, if it is determined that some form of residential development is deliverable it must be ensured that it is of low density and includes substantial buffers of both the nature reserve to the east and the green space to the south.



## 34 - Land at Bell Farm (primary area), Carlton Colville

### kathryn bradley

Carlton Colville has seen enough development. This site was rejected from the last local plan because of flooding problems. What has changed? It is agricultural land and new homes could be better sited elsewhere.

### Andrew Deal

This site would need to drain into Kirkley Stream which regularly causes flooding in the area.

A proposal for 150 dwellings could cause further flooding problems

Access is presumed to be onto The Street where parking is a problem and a new junction would aggravate highway safety in the area.

can local schools and amenities cope with further development in this area?

This appears to be a site which where development conflicts with council policies which seeks to "ensure that developments avoids areas of risk"

### Tim Meadows

The "Initial sustainability Appraisal of Emerging Options" paper is encouraging in that the only negative points identified relate to;

(A) "reducing contributions to climate change and mitigate effects"

(B) "Conserving natural resources"

In response to items (A) and (B), considering Site 34 is Greenfield land, it is often the case that potential issues can be identified in relation to these matters, however given the scale and situation of the site, and it's proximity to Site 35 to the west (which we have also submitted on behalf of our client), we believe that a potential development could be designed to involve particular features and infrastructure improvements to mitigate and counteract these potential issues.

The site extends to approximately 5 hectares and could accommodate up to approximately 150 dwellings (based on an assumed 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

The site is accessible via Low Farm Drive, and there is also potential to create an access from The Street, over Site 35 to Site 34, if there is a requirement for a more substantial road connection into the site. Site 35 benefits from an approximate 50 meter road frontage on to The Street.

Development of the site would represent a logical extension to the south of Carlton Colville. It is abutted by residential development to the north and the east. As mentioned previously within this representation, the land to the west is also owned by our client.

Given the site's situation, we believe that it's development would certainly be suitable as it is easily serviceable and accessible. It is within cycling and walking distance from Lowestoft, a key area for prospective employment growth over the coming plan period.

Subsequent to the previous narrative, we consider the site to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation



to this site.

**Adam Skinner**

i think this is suitable land.

**Environment Agency (-)**

Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. The potential development sites numbered 34 & 35, as well as the much large proposal for residential development linking the A12 and the A146 could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. In addition, the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities. It will be essential for you to discuss this with Suffolk County Council as the Lead Local Flood Authority (LLFA).

**Historic England (Debbie Mack)**

Moated Site Scheduled Monument to west. Potential impact on setting.

**NorCas**

Far too much development in the area already and any more will exceed services and communications.

**Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 21; 22; 34 and 98 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

**35 - Land at Bell Farm (secondary area), Carlton Colville**

**kathryn bradley**

Carlton Colville has seen enough development. This site was rejected from the last local plan because of flooding problems. What has changed? It is agricultural land and new homes could be better sited elsewhere.

**Andrew Deal**

A development of potentially 320 houses on this site would cause additional flooding problems in Carlton Colville.

This is a major concern both locally and downstream of the proposed site.



Extra strain on congested roads, local school & infrastructure in the area.

#### **Environment Agency (-)**

Carlton Colville and the Kirkley Stream in general are known to suffer from flooding from both the Kirkley Stream and surface water sources. The potential development sites numbered 34 & 35, as well as the much larger proposal for residential development linking the A12 and the A146 could offer the opportunity to reduce the existing flood risk and implement some of the early concepts that have been produced for public consultation as part of the Lowestoft flood risk management strategy. In addition, the management of surface water from any future developments in this area will need to be strictly controlled, and ideally consider opportunities to reduce flood risk to existing communities. It will be essential for you to discuss this with Suffolk County Council as the Lead Local Flood Authority (LLFA).

#### **Historic England (Debbie Mack)**

Moated Site Scheduled Monument to west. Potential impact on setting.

### **36 - Land at Cromwell Road and London Road, Weston**

#### **Nicky Elliott**

I feel this land should not be developed, as it is well beyond the southern boundary of the town, away from services and facilities, and is not bounded to the south.

### **37 - Land at Dukes Bridge, Beccles Road, Bungay**

#### **Anonymous**

Places labelled 55, 37 on the Bungay development map are areas not very well set up with infrastructure, they include already very built up urban areas. With this the land on St Johns Hill (45) would better be suited for housing and other leisure facilities.

#### **John Lavery**

This site seems to have a major drainage issue with a watercourse going through and/or adjacent to the site. Considering the recent furore(s) about building on flood plains this area seems a dead duck for housing and/or a care Home from the outset.

#### **Peter Norman**

Not an ideal development site as very low lying land and close to water / drainage channels.



### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Partly in Flood Zone 3

\*Flood Zone – A floodplain is the area that would naturally be affected by flooding if a river rises above its banks, or high tides and stormy seas cause flooding in coastal areas.

<http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

### **Historic England (Debbie Mack)**

Dukes Bridge House, Barn and wall all Grade II to the north. Potential impact on setting of Listed Building.

### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 37 and 55 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

## **38 - Land at Green Lane, Reydon**

### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development? Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane. Could perhaps add some houses near Pitches View.

### **Ms crook**

I do not see how Green Lane could cope with possibly 211 new house/businesses (sites 5/38/26), one end Green Lane/ Wangford Road has a very dangerous corner entrance/ exit with traffic unable to properly see around corner, the other end Green Lane/ Rissemere Lane East/ Cox's Lane/ Covert Road has a dangerous crossroads with Cox's lane used as a 'rat run' to the Lowestoft Road, this already causes problems as it is a narrow road , with such a possibly large increase in traffic both residential and business this would only make the situation worse. Also why should office/ storage or distribution be allocated to this site not at the industrial site area with other businesses, infrastructure in the Green Lane area could not cope.

### **Jim Elmes**

Off Green Lane is the most appropriate.

### **Mr & Mrs McNally**

We attended the meeting on Tuesday 10 May to view the Waveney Local Plan. We were surprised to see so many homes planned for Reydon. Is there really a need for this amount of extra housing in this area?



We asked the Planning Officer if the necessary infrastructure would be put in place prior to or at the same time the homes would be built. We were shocked to be told that this would not be the case and their remit was just to build houses and there was no link up with any necessary services. We pointed out that there are currently long waiting times for appointments at the Health Centre and treatment times at the James Paget A&E are below targets. The Planning Officer said that shortage of doctors is a nationwide problem and any improvements needed cannot be part of the housing development plan. There also appears to be no firm plans proposed for more school places, jobs, shops, sewage capacity etc. for the 972 homes mentioned.

It would appear that the area will be overdeveloped to provide housing with no thought for the well being of existing or new residents. Surely this cannot be right and we are writing to ask what action you will be taking.

There is also the concern that a lot of the new property will be second homes and holiday lets and wonder if you will be considering adopting the St Ives ruling of not allowing this type of person to purchase new properties. This would make it less attractive to developers to build such large housing developments.

One last point when does a village enlarge so much to qualify to become a town?

#### **clive tickner**

Wholly inappropriate development on farmland. Outside the village limits. Occupies a large part of our AONB. Creating a new village within a village. Current infrastructure unable to cope. Traffic problems will occur due to the few roads that lead from the A12 to Southwold.

#### **Environment Agency (-)**

Over an historic Landfill Site

#### **Historic England (Debbie Mack)**

Grade II\* Church of St Margaret to West - potential impact on setting of LB

#### **Reydon Parish Council (Jean Brown)**

[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

#### **Southwold and Reydon Society (Philip O'Hear)**

This site is wholly unsuitable and inappropriate for development. It is outside the boundary of the settlement of Reydon and in open countryside which is part of the AONB. The local roads are unsuitable for the significant increase in traffic which would result from this development, especially heavy goods traffic that would be generated by the proposed business uses. The sewage infrastructure, especially in this part of Reydon, is already beyond its capacity and this is a further reason for rejecting this proposal.

Development on this scale is not needed in Southwold and Reydon to meet the targets for new housing if the



option to concentrate growth in Lowestoft is adopted as we have elsewhere argued for economic and regeneration reasons. There are other sites which could meet the local housing target by small scale developments which would not impact heavily on the countryside or cause undue strain on the infrastructure. There is unused land on the Reydon Business park for business and light industrial development.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 5; 26 and 38 are in close proximity of Benacre to Easton Bavents SPA and Pakefield to Easton Bavents Site of Special Scientific Interest (SSSI). We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the SPA or the SSSI.

## **39 - Land at Grove Farm, Bungay**

### **Sarah Brown**

From my perspective developing this site is untenable. There are several reasons for this, as outlined below:

- ▶ Both potential points of access to the site are unsuitable; Annis Hill is a fairly steep narrow country lane. It is not wide enough for 2-way traffic and the entire lane is not visible until drivers/ pedestrians are on the brow of the hill. This currently puts vehicles and pedestrians at risk, at best means cars frequently have to reverse to create passing space, at worst results in accidents (I'm aware of several that have happened there, one involving the hospitalisation of an elderly gentleman and the death of his dog); Beccles Road is already very busy and is downhill and on a bend, traffic rarely reduces speed to 30mph by the time it reaches the bend on the approach to the town. It can be very dangerous trying to enter or exit the driveways for the houses, numbers 122 - 130 Beccles Road. Due to the increasingly heavy traffic along Beccles Road the two right turns at the old Watchhouse have also become increasingly difficult to negotiate. Extra traffic here would be undesirable and make that stretch of road more dangerous.
- ▶ There is no mains drainage along the eastern end of Beccles Road. 122- 130 Beccles Road are on septic tanks and we believe there are others. This makes the sewage management of mass housing incredibly difficult.
- ▶ The hill that this site is on is made of sand. Sand can be an unstable material to build on and the builders of our property reported several challenges during construction due to the sheer amount and depth of the sand.
- ▶ Concreting over the land above our property as necessary for new buildings could lead to run-off which would travel down-hill to the gardens below, one of which being ours. This causes a potential flooding and land slide risk to our property.
- ▶ The current infrastructure cannot sustain an increased population in the town; there are too few resources in Bungay to support the population already here, e.g. Doctor appointments, dentist appointments, parking availability in the town, school spaces etc.
- ▶ Currently the approach to Bungay from the Beccles direction is attractive and unspoiled. Development would spoil this and would be highly visible from the road. It would be an eye-sore that could not blend in with its surroundings due to the height of the land; it would be too high a skyline for this side of the town.
- ▶ One of the reasons we bought 128 Beccles Road was the appeal of the rural aspect directly behind the property and the quiet that comes with this. Housing on this site would obviously spoil that for the properties here and will mean we are over-looked, an issue to which we are very strongly opposed.
- ▶ We also anticipate that this will decrease the value of our house; when we purchased our home, this potential development had not been proposed.

### **Allen Harradine**

Saw this Map 39 today following a conversation with Robin Cook and later Dickon Povey both of whom were



very helpful. As the proposed development appears to be adjoining our perimeter we should be grateful if you would add our email address to your database and keep us advised of any future consultations or any matter regarding Map 39.

Best wishes

Jean Harradine

### **Henderson**

This site is currently agricultural land with heavy clay soil, which is generally used for arable crops. The site is situated on a steep bank 0-30m rise (estimated from OS map contours) across the site. Land at the top of the site regularly has standing water on the fields and within the drainage ditches.

The road to the south of the site (Annis Hill), which would appear to provide the access to the main part of the proposed site is a single track road of less than 4m wide. There is no passing place on the hill and there is limited visibility of vehicles approaching from outside the town (down the hill). In the last 6 months 4 residential properties on the other side of the road have been built with drives that exit directly on to the road.

Currently, the road provides a route to 20-30 properties in the parishes of Mettingham and Ilketshall St John, along with access for agricultural vehicles servicing the surrounding land. The road is also used regularly by local runners and cyclists for leisure activities and is a highly used route for numerous local dog walkers, as it provides easy access to the countryside for residents on the estates either side of it.

During winter periods Annis Hill routinely has water flowing down it due to the higher elevation land either side of it using it as the main overflow route for land drainage. There is no drainage ditch either side of the road and the breadth of the road is restricted by residential properties already in existence further down the hill.

Over the last 5 years the road has been subject to numerous patch road repairs due to the effect of this flooding and resultant frost erosion. Similar repairs have been required to the telephone / broadband infrastructure which is located part way up the hill.

Electricity supplies beyond the estates at the bottom of Annis Hill are supplied via overhead lines. There is no main gas supply beyond the current residential estates, nor is there mains sewerage beyond this point either.

Whenever, agricultural land is to be given a change of use to a residential area, it the following must be considered:

- (1) Is the site suitable for the proposed development?
- (2) Is the access to the site suitable to meet the increased traffic requirements of the number of homes to be developed.
- (3) Will the increased traffic flow cause a significant detrimental effect to current users?
- (4) Is the current infrastructure suitable to support the increased usage demands?
- (5) Does the benefit of the extra homes outweigh the loss of the agricultural land?

Taking each of these points in turn:

(1) The proposed use of the site is for 207 nursing / care homes. It is highly questionable whether a site of such a steep elevation is anyway suitable for the proposed use, as residents of such properties are likely to have reduced or poor mobility. Anybody who has walked or cycled up Annis Hill would know that it is not easy to



climb.

(2) Annis Hill is very simply a county lane. In its present form it is not suitable to take the increased traffic flow the proposed number of properties would generate. The width, condition and visibility of the road all provide significant limitations for access and given the residential properties that are already in existence it is difficult to see how the road could be widened and improved to the required standard.

(3) Runners, cyclists and dog walkers all use Annis Hill for leisure activities, due to the fact that it is a quiet road leading out into the countryside. The increased traffic flow is likely to put an end to this leisure use. It is also a concern that agricultural traffic that regularly moves to and from farms further down in the town to those outside of the town will struggle to pass a regular flow of cars on the hill, resulting in obstruction, congestion and damage to the countryside either side of the road.

(4) If the site is to be developed, a significant extension and upgrading of all forms of utilities and infrastructure would need to be undertaken. Mains gas supplies and sewage would need to be extended and overhead electricity and telephone lines would need to be upgraded.

In particular the flooding / land drainage will need to be addressed as a priority. Currently the land drainage that is in existence is not working (as evidenced by the regular overflow onto the road). This issue will be only exacerbated by the development.

(5) This a difficult point to make a judgement on and the artificial division in infrastructure / property planning between different levels of local and national government makes such considerations harder. The growth in population in the UK means that more homes are required. There is no point arguing on a not in my backyard basis. However, as a country we also need to ensure long-term sustainable food production for our future population. If we rush to convert agricultural land to residential use, we solve one immediate problem only to create a potentially more devastating one.

Given all of the above, I do not believe that the site suggested is suitable for the proposed use. If this land is to be developed for residential use the I believe significant thought must be given and legally / contractual protection put in place to ensure that the required road access and utilities / infrastructure are developed to support it. There will also need detailed thought to be given whether the services that in existence within Bungay at present are sufficient to support the increased elderly or disabled population (depending on the nature of the proposed residential properties) the development represents.

### **Tracey Holmes**

I live in Throckmorton Rd directly down the hill below where this proposed development would be. My objections are

1. That Annis Hill is a very busy road and that it narrows considerably near where this development is proposed. I would not welcome even more traffic along both Annis Hill and Hillside Rd East.

2. I would be very concerned about drainage and the dispersement of any rainfall off a concreted over area such as this directly up the hill from me. A relative of mine had rain run off a farm field (and that's without it even being concreted over, which would surely be much worse) straight though her house and I would be concerned about this from such a development. I have been concerned about this even before such a



development as the drains directly above where i live are never cleared out properly and are always blocked with litter, so in addition to the water running off a concreted development, there would be nowhere for it to get away, except to pour into my garden

3. I would also be very sad to see those fields built on, as many people including myself, from the neighbouring estates spend time up there walking and biking- there is a lovely view across the valley - and in my opinion that area should be preserved. There are very few areas in Bungay where you can go for a quiet walk without too much traffic and this is one of them.

#### **Broads Authority (Natalie Beal)**

Site 39 – Housing development at this location has the potential to impact adversely on both the landscape character (LCA 2) and the visual amenity of the users of the Broads. Any scheme at this location would need to be sensitively designed to ensure that potential impacts are assessed and mitigated through a suitable layout and the provision of adequate vegetation buffers both on the northern boundary and within the site as it is located on rising ground. Street lighting and other above ground utilities may be an issue as well.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Partly Source Protection Zone 1 with the other after in Zone 3 and within Drinking Water Protection zone  
\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites suitable for development:  
39 Land at Grove Farm

#### **Suffolk County Council (James Cutting)**

Subject to further assessments through the planning process, the proposed level of development is acceptable in principle. However, access constraints are likely to be identified on site 39; any proposed access onto Annis Hill would require widening the road due to its narrow width, this site should provide its main access from B1062.

### **40 - Land at Laurel Farm, Hall Lane, Oulton**

#### **Badger Building (Edward Gilder)**



We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

Site 40 off Oulton Road relates well to the development to the south, presently under construction by Persimmon.

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

40 Land at Laurel Farm, Hall Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

## **41 - Land at London Road (former Ashley Nurseries site), Kessingland**

### **Mary Hill**

It appears that you have marked land on London Road, next to 109 and in front of Pond Farm as potential building land. This field is a green field site, and has not been offered up for redevelopment. Originally this land was all part of Ashley Nurseries, but was broken up and sold off many years ago, at least 30 years that I know of. This field is all part of the Strategic Gap promised by Waveney Council that would remain to keep Kessingland a separate village from Pakefield. There is no mention of redevelopment in our Local Plan. I would also like to mention that I do not like the idea of Ashley Garden site being redeveloped for housing as this too will begin to fill the Strategic Gap.

Thank you Mary Hill

### **Jo Thompson**

I am disappointed to see that this is the only site in Kessingland that coincides with the Kessingland Village Plan.

While this site occupies part of the 'Strategic Gap' that was designed to prevent the further expansion of Kessingland towards Pakefield/Lowestoft, I accept that as a brownfield site change of use is now almost automatically achieved.



This was also the site identified by Kessingland Parish Council after consultation with residents as the 'least of all evils' as a development site as it is currently derelict.

Having said that, it has serious issues with drainage that the developer would need to rectify before proceeding.

I would also note that the village plan designates this site for starter homes and light industrial units not just houses as in the Waveney plan. The village plan is keen to ensure that an already overdeveloped village builds in sustainability in any new developments. We do not wish to become solely a holiday and retirement village with no scope or opportunity for our residents. The only housing 'need' there is in the village is for affordable homes, which the Village Plan addresses (in addition to the Ashley site) comprehensively by use of Laurel Farm land to the south and east of Ashley's.

This also relates to our already overstretched drainage and sewage which is a serious issue on this site as well as generally throughout Kessingland.

Further development here will also require addressing issues of traffic, parking and speed, which are already serious issues and concerns in London Rd

### **Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

We note that site 41 in Kessingland is put forward for a mixed use development in the Kessingland Neighbourhood plan – we will be making representations of support of this to the plan hearing, but we will have to point out that the aspirations set out in the plan, in terms of a mixed use, cannot be accommodated at the scale proposed. There is insufficient space for the quantities of development suggested and in addition we conclude that the cross subsidy of starter units by residential, in the manner proposed, is not viable.

### **Historic England (Debbie Mack)**

Adjacent to Pond Farmhouse grade II listed. Potential impact upon setting of Listed Building.

### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 41; 85; 109 and 119 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

## **42 - Land at Market Lane, Blundeston**

### **David Bennett**

I am writing to you to express my concern and to object to the proposed development of site 42 adjacent to Market Lane in the village of Blundeston. My property overlooks site 42 and currently has attractive views to



both front and rear and is the reason we purchased this property. I do not wish for this rural setting to be made into an estate. This development will inevitably reduce house prices for the residents of Market Lane and make this a less desirable part of the village.

**simon bunting**

too many houses in village for school /roads /parking

no healthcare to support this population increase

**Ian Burwood**

To whom it may concern,

As a resident on Market Lane for the last 17 years, we have had a long and painful situation with regards to surface water and sewage issues along the length of Market Lane outside our property. Although some works have been carried out, it is still debatable as to whether the issue have been completely solved. Apart from the obvious of this potential planning causing the glorious field views behind us being taken from us and other residents along this stretch, the infrastructure for surface water and sewage systems would be of a very serious concern, with doubts already about the current system.

We have over the last couple of years attempted to sell our house, but with the water and sewage issues encountered it has caused doubt in potential buyers, and thus has had a knock on effect concerning the value, and ultimately the selling price of our property.

The initial attraction for us to purchase our house was the rural, peace and quiet location of a village atmosphere, this unfortunately has decreased over the years. If any potential development of this kind is considered, the village feel will no doubt disappear and just become one of the many concrete jungles that are appearing more and more within the UK countryside.

Kind Regards...Ian Burwood

**Lisa Doylend**

With comment to the option of sites that housing has been proposed for in our village, I seriously think that our small village roads cannot cope with the extra volume of traffic. Sites 42, 27, 129, 29 should definitely be ruled out.

Site 42 – Market Lane certainly cannot cope with a potential extra 254 cars (2 per household).

**Elizabeth Fulwood**

Following receipt of a copy of the proposed new housing sites in Blundeston, I write to express my concerns over 2 sites in particular, Site 63, suggested for 242 houses and Site 42 suggested for 127 houses.

Whilst smaller developments of 5 or 10 houses can almost be built unnoticed, much larger developments such as those suggested for Sites 63 and 42 would, I feel, destroy the beauty, the peacefulness and charm of the village which are the very reasons I moved into Blundeston over 25 years ago. The open spaces and views I



have enjoyed in the village for many years would be lost and traffic and noise would increase.

Whilst I understand that not all sites will be needed and not all the proposed number of houses on those sites will be built, I am concerned that should the larger sites go ahead, the Blundeston I know and love today will be lost.

I do not object to new houses being built in Blundeston but I do object to such large developments.

### **Terry Gooding**

Blundeston cannot support a development of this size, there simply isn't the infrastructure to justify it. Destruction of greenfield sites, over subscription of essential services such as schools and doctors, the fact that roads will become busier and more dangerous as a result. Increased risks of flooding due to concrete coverage.

As a wider concern I do not see plans for new hospitals, fire stations, police stations, doctors, school or public transport

Why is the redevelopment of the prison site not included here which in itself will contain at least 100 houses - will this offset your need to build all over Blundeston & ruin yet another beautiful village. People live here to escape the sprawl not live on a housing estate.

I appreciate that housing is required but not on this scale and any planning application of this nature will be opposed by all who live there.

### **David Grant**

I strongly oppose the proposed development of 127 dwellings off Market Lane, Blundeston. I have serious concerns regarding traffic influx and road infrastructure allowing the safe transport flow through the village. The current drainage and services would not cope with the addition of 127 dwellings. The current storm water out flow for Market Lane would not cope with additional housing. Anglian Water have been on site within the last few months and are well aware of this problem. The village primary school will also be unable to cope with an additional influx of children to the area.

The area is of ecological importance with a public footpath running through the proposed site with known sightings of badgers, foxes, barn owls, buzzards and bats.

I would urge you to reconsider your proposal for these dwellings and to also take into account the well being of the many elderly residents who reside within Market Lane.

### **pamela holman**

Dear Sir or Madam just a quick comment of the proposed land for building houses at market lane .It must be a difficult time for you to find land but the worry i have is the road in and out of blundeston the A12 is quite hard to get out of onto the dual carriage turning right. Also there is not facilities in the village for another housing development what with the prison already okayed to go.Plus a small primary school just a small bus service hourly. The roads are quite small to cope with another 127 houses with there cars.Please do not think a for a moment i could do the job you are doing .But i would like to give my opinion on this matter Kind regards P Holman.



**andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

**andy Howlett**

Object.

Already too much traffic in the village.

The structure of the village cannot sustain the additional traffic that a development of this size will create.

It will destroy the nature of the village.

**Gerry Kitchener**

In the ten years we've lived in Blundeston it has continued to grow with building that has respected the character of the village. From our own experience the Planning Dept can take some of the credit for this. How then is a development that looks to shoehorn 130 units into a green space close to the village centre even up for discussion/comment?

I have seen the term "bombing" used to describe how developers look to drop these sort of developments into the countryside and the term is an appropriate one in this case as it would have a devastating impact on the village and destroy the character of the village.

We have one of the many homes that enjoys looking on to this piece of countryside and do not want to lose it to greedy developers. We certainly don't want to be living on the perimeter of a housing estate. The Planning Dept should not entertain this proposal and should protect the green spaces around Blundeston.

**John Mitchell**

Site 42 suggested for 127 houses appears to have access onto Market Lane. See my comments above for site 27: Site 27 suggested for 5 houses appears to extend into open countryside. Market Lane is narrow at this point and on-street parking here is already causing access and visibility problems.



## Newman

I cannot see how the infrastructure into Blundeston can support this density of housing in the heart of the village. A best guess would be an additional 200 cars and Market Lane is just not suitable for this volume of traffic. The other obvious concern is supply of utilities and waste removal from such a large site.

Secondly, I agree with the strategy to use small and discreet parcels of land for development but such a large development in the heart of the Blundeston village would have a massively negative impact on the character of this village.

My last point is why has the development of the former prison site been taken into consideration for the WDC development plan. Surely this should be taken into consideration!

## Bruce Rayner

Site 42

Plan indicates that housing demand may exceed supply and that there may be a requirement for a further 8,000 homes before 2036. Before large areas of the locality are built upon, are the Council certain of the requirement? It would seem irresponsible to build numerous 'white elephants'. Is this not merely a function of the Government's policy to build a specified number of homes but without certainty of need in this area?

Plan indicates that there are already 3,141 new homes in the pipeline plus a further 633 anticipated. That would seem to be enough for the present until precise requirements are known.

a) Most employment is South of the river.

b) Transport in Blundeston is poor, there is bad road access and it is dangerous even with low traffic. Sites 164-165 are better served.

c) Site does not benefit from obvious safe and easy access.

d) Why spoil such a beautiful area, enjoyed by tourists, local runners and cyclists? Further traffic would be a hazard.

e) As a Chartered Surveyor, your numbers per hectare do not appear to be accurate.

f) There are no amenities in Blundeston, not even a village shop for milk, bread etc.

g) There is no regular bus service. Increased traffic to get in and out of the village is an environmental issue. Areas identified South of Lowestoft are already served by public transport and allocated safe cycle routes.

h) Properties in Blundeston are mature. New homes next to what are already new homes in Carlton Colville would be much better.

i) By publishing this document, you seem to have added planning blight to nearly all of the homes surrounding Lowestoft for no apparent reason.

j) Building 456 new homes in Blundeston would almost double the population of the village, surely not desirable, sensible or necessary.

k) Current essential services / supply (water / sewerage / gas, etc.) are limited. At certain times of the day water pressure is already very low.



- l) Risk of flooding through rainfall if a concrete jungle is built - sewers can't cope.
- m) Broadband is slow and mobile phone signal is bad.
- n) Development on the prison site is already ample for the village to cope with.
- o) Blundeston is inhabited by lots of wildlife - there are owls, newts, hedgehogs, etc. I've heard baby owls calling to their parents from our house. Some of these species are becoming rare. Why destroy these areas when there are alternatives?

It makes far more sense to build on the sites identified in Carlton Colville. The proper infrastructure could be put in place in one designated area. Why spoil beautiful landscapes, upset huge numbers of the local population and potentially decrease tourism and enjoyment of the areas outlined.

### **John and Ann Reeve**

We wish to register our objection to the development of Site 42.

The prison site is to be developed, this is a brownfield site & obviously something will be built there. This will stretch the amenities of this village to the maximum. At present the village resembles a building site with all the minor developments spread around. The prison development will dramatically increase the population of the village, and further loss of greenfield areas will result in it becoming an urban sprawl.

There is insufficient infrastructure to support these wholesale building plans - a point which has already been acknowledged.

We have made our position clear to our Councillor, and hope for an outcome which will prevent the loss of unspoilt land.

### **Gary Shilling**

As outlined in my local village news letter (Blundeston) I would like to register my rejection to any large scale building (sites 29, 42, 63 & 129), in my opinion the village neither has or has the ability to enable a construction on these scales. We have neither the roads to handle the increased traffic ( roads not in a good state of repair or wide enough, concerns for children around the village as no road has a cycle lane or footpath), the school could not accommodate an increase, no local facilities and simply no need. It is nice to remain a village and not end up becoming part of oil ton broad as outlined village has done! I have no objection to small (under 10) development that allow the village to absorb the impact that it would have. I understand this is a biased view, but like everybody whom lives here, we picked it because it is a small village. This is mind with the development on the old prison site and other sites (that have been constructed and are just footings in the ground) the usual infill sites have been enough. The development on the prison will increase the traffic in and out of the village hugely as most households have two cars if not more, and that with children staying at home for longer traffic will increase without further building. T can already be seen throughout Lowestoft, Blundeston aside people are increasing parking on the road instead of using garages of changing front gardens to off road parking which should be implemented to remove cars parked on roads to increase road safety. Sorry didn't mean to turn into a rant.

### **Gary Shilling**



Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians),

### **Gary Shilling**

Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians),

### **Simon Tate**

I write in connection to the above, potential proposed land for development at Market Lane in Blundeston. I have examined the plan in detail and know the site well. I am perplexed and dismayed that this land could even be considered for development given the impact that this would cause to the village, the environment, the nature and its wildlife. The poor drainage/sewage network that already exists in the Market Lane area causes flooding and sometimes raw sewage to enter into private dwellings gardens when the drains cannot cope, this problem would only be heightened with higher volumes of sewage and rainwater run off from further housing. The road network is also made up of narrow country lanes and are no way intended or designed to cope with large volumes of traffic from a new residential estate. This has been proved countless times when the A12 has been closed off due to an accident and the traffic has had to be re-directed through the village causing bottlenecks, long delays and safety issues.

Children who live in the village including our own are encouraged to walk or bike to school at the moment whenever possible ( Blundeston primary) to help relieve the traffic congestion that already exists at the school area during pick up/drop off times and also to encourage exercise. This will then not be possible for my children and many others as the dangers created by the high volumes of traffic travelling at high speed on the narrow country roads roads means it will be unsafe for them to walk or bike to school. There are no paths, cycle lanes or street lights so the children have to use the roads to get to and from school. If it becomes a safety issue then children cannot and will not be allowed to walk or bike to school, this will then have the knock on effect of creating more traffic at the school as more parents will have to use the car.

I wish to object strongly to this land being developed for extra houses in this location. Estate development would overwhelm it and ruin the character of this beautiful village and the visual impact it would have on it. The proposed development would potentially kill off the rare species of wildlife that live on the above rural land (adders - reported and documented with RAUK adder conservation, barn owls and field mice), and would also destroy ancient field boundaries. The proposed large development at Market Lane plus others in the village including the one at the prison site would in all honestly mean the end of this famous small village and due to the increase in size would become a town. This would have the adverse affect of driving many generations of local born and breed families away from the area taking there business with them.

Our property would become engulfed, overlooked from the side and rear of the property. This would have an adverse impact on our view, it would block sunlight into the garden throughout the entire day and kill off the wildlife that enters into our garden. This would also affect the view of the majority of local residents within the area/village. The noise, disturbance, loss of privacy, overshadowing are all things that should be looked into. This proposed development is over bearing, out of scale for a small village, have a huge impact on the environment, the nature, the wildlife that lives and thrives there and will have a huge safety impact on the area.

Finally, the proposed piece of land at Market Lane is one of tranquility, stunning scenery, of nature, of significant history, a haven for wildlife which should and must not be destroyed just to squeeze in extra affordable housing. As once the countryside is gone we can never get it back again.



**Donna Warren**

To whom it may concern ! It has been brought to my attention that there is intent to build opposite my house 127 ! Houses ! I have lived in the village for 48 years ! 21 at current address ! When I moved out of my family home to start my own family ! My husband and I worked all hours we could with a young family to make it possible to afford a lovely village life with a lovely home with a school and play school offering the best ! If we wanted to live in a build up area we would have got a cheaper property in park hill area ! Why do you think more houses is needed ? out drains down our road flood into the local pond on an occasion killing fish and polluting the pond ! We don't want built up areas ! Which will than need doctor surgery /shops /garage ! We lived with out for years and don't want them now !!! Keep this village what it should be a village ! It can't cope with any more big building plots ! The old prison will be supplying many new buildings which people find is enough ! A Property down market lane (lovely bungalow ! Pulled down ) is being developed into a house that's not even in keeping with the village ! No body wants a housing estate in a village !!! Properties close will lose value ! Which many have worked so hard to have ! and to keep !hold A village meeting and you would see how many feel about your plans

**Mr David and Mrs Mavis Wilson**

We have enjoyed living in Market Lane, Blundeston for 27 years with the same neighbours, with open countryside front and rear. We are now in our late seventies and eighties and thought that we would be enjoying seeing these views until the end, not 127 houses as proposed. Blundeston, in our opinion, has been and will be, overdeveloped with houses. No new facilities, the school will be too small, inadequate drainage, sewage, etc. There will be more cars, some of the streets already have problems with vehicles not being able to pass through, and the bus service has been cut which is a problem with young and elderly residents.

We are not just speaking in regard of the field at the rear of our property, but all the other sites which are being proposed. With the prison land already going to have 130 houses built upon it, the village will look like a town, not a village.

Please would you reconsider many of these sites?

**Melanie Wright**

I have always understood that the only future development that would be allowed in Blundeston would be "infill", ie on land between existing dwellings, or to replace an existing property. This site does not appear to fall within those criteria, and would vastly increase the size of the village, over and above any redevelopment on the old prison site, and we simply do not have the infrastructure to cope with additional dwellings in the number proposed.

If I am correct in thinking that the land is that which runs behind the Plough, then this has been prone to retaining a lot of surface water and may not be suitable to be developed. There is also the issue of access from Market Lane, not to mention the further erosion of available farmland in the area.

We have only just, after over 20 years of trying, got the issue of flooding on Market Lane sorted out and a development of this size could impact on the work that has been done in this respect and allow the flooding issue to become active again. This would be a shame given the efforts made by residents, the Parish and Local councils, and our MP, which resulted in the issue being resolved.

It is all very well building more and more houses, but where are these people going to find employment, where will their children go to school, and where will they be able to register with doctors and dentists to look after their health needs? The doctors surgery at Bridge Road is already suffering due to the influx of patients from the recently closed surgery in Oulton village, the village school is nearing capacity with little scope to



expand its building, and there are very limited employment opportunities in the local area.

I think that major planning applications **MUST** take these considerations into account - there is the need to look not only at the quantity of properties being built but also the quality of life for those who move into them. Sadly, this does not always appear to be taken into account, and is leading to Lowestoft and the surrounding area being in danger of becoming one overgrown housing estate with little to offer residents in the way of jobs, amenities or a satisfying lifestyle.

#### **Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

#### **Historic England (Debbie Mack)**

Proximity to the Plough - Grade II Listed building. Potential impact upon the setting of Listed Building.

#### **N/A (Tim caley)**

This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are constantly clogged with school traffic.

#### **None (Stuart Precious)**

As per my other comment: As a resident of this village I am very concerned that a development of this size which is frankly un-necessary, would irreparably alter the character and dynamics of the village. The infrastructure required does not exist. We don't even have an effective bus service.

#### **Not a business (David Preston)**

I feel that this is too many extra houses as it will change the character of the village.

I am also concerned that the infrastructure, particularly drainage, would be a problem as it seems to be under constant strain as it is.

#### **Primary school (Maria Ball)**



My comments apply to all pockets of land within Blundeston listed in the Local Plan, not just the site mentioned above.

Blundeston is a village, and like many other similar villages all over the county, large scale development of housing is an ever present threat. Whilst most people accept that some development must happen, large housing estates are not welcome. Many years ago this happened in Carlton Colville, which is now one enormous housing estate, it once being a village is totally lost and forgotten. Most people living in Blundeston do so out of choice because it is a lovely village, just rural enough with no large estates and surrounded by beautiful countryside.

The former prison site has now been earmarked for redevelopment, primarily housing. I think this development should more than suffice our quota for new housing.

I would hate to see Blundeston, and other similar villages, become over developed in the coming years. Please protect our villages not destroy them.

#### **Suffolk County Council (James Cutting)**

The large sites around Blundeston (63, 42, 129) are not currently desirable as there are limited amenities and services within reasonable distance to promote sustainable travel patterns and some of the road network might not be of sufficient standard or capacity. If this scale of development, including growth beyond the village and the proposed redevelopment of the prison, is to be brought forward, a comprehensive review of transport issues will need to be undertaken which may include opportunities for further enhancement of transport infrastructure and services.

#### **43 - Land at Montrose Garage, London Road, Beccles**

##### **andy house**

this looks like a sensible site with good links via the london road - it is also a brown field site. housing density seems high

##### **Paul Leman**

This Site is not suitable for development. It will significantly add to road congestion in the area / Beccles as a whole. The Beccles Medical Centre is already overstretched. Any housing development should be well outside existing towns / on a new settlement.

##### **Councillor Caroline Topping**

As I said earlier, I am not against Beccles having new affordable homes and bungalows however these need to be built in manageable sizes around the periphery of the town and brown field sites such as plot 16 (24 homes)



in the town centre and plots 156 (260 homes), 43 (40 homes), 108 (49 homes) all along a current main road, where there is currently little development and not feeding into the current traffic hot spots which is Ingate Street/Lowestoft Road.

#### **Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

#### **Beccles Town Council (C Boyne)**

Whilst the council appreciate the need for development in the area over the next twenty years, it must be handled with great care as the infrastructure in Beccles is at breaking point now, especially the Health Centre. With this in mind, it is felt that any housing development should be restricted to the area to the South West on one or two of the sites numbered 24, 43, 108, 145 and 156, as this makes the best use of the existing and planned road infrastructure. However, this area would require a new primary school and a convenience store and other associated infrastructure to service any expansion. In addition, the two small sites in Beccles, numbers 1 and 16 and site number 60 in Worlingham could also be included as sites for development.

#### **Broads Authority (Natalie Beal)**

Group of sites to the south of Beccles – As they are on rising ground, any development proposals would need to be assessed for potential landscape and visual impacts on the Broads area.

#### **Historic England (Debbie Mack)**

Proximity to Beccles Conservation Area - potential impact upon Conservation Area.

### **44 - Land at Sandpit Lane, Worlingham**

#### **Susan Doherty**

Sites 44/60/62 Over 600 houses in this area is not sustainable, again no infrastructure, loss of habitat for wildlife, far too many houses

#### **Paul Gurbutt**

1. How do you protect the historic heart of Beccles from the increased traffic. All the developments are south of Worlingham and all the supermarkets are to the north (\*) traffic blocking Beccles. The secondary schools locations (\*) that cross Beccles traffic is inevitable. Larkfleet (area 82) gave no assurance of any solution to the traffic problem.
2. How do you plan for extra infrastructure? I have heard from Anglian Water that the sewage treatment



works is already over stretched, without 100's more houses.

**andy house**

I do not think this site is suitable for a development of this scale as the road access is on minor roads through residential estates. The school already crowds the roads at certain times. There are few local facilities in Worlingham and direct access to those in Beccles is along Lowestoft Road which has several traffic pinch points already - rail crossing, peddars traffic lights and Blyburgate.

If college lane is seen as the main access to Beccles the right turn onto Ellough Road would require upgrading

Any significant increase in population of Worlingham would further stress the healthcare facilities at Beccles Medical Centre and the local dentists which are already difficult to access.

**andy house**

90 houses seem a lot for this small area and would be out of character with the surrounding parts of worlingham. perhaps half this number would be more appropriate it would best be accessed from college lane which would need an improved junction with ellough road.

**Rachael Staniul**

Is a prime example of a rich wildlife habitat – birds, insects, butterflies and mammals. Hedgehogs are in serious decline due to habitat loss, and the removal of hedgerows. Covering this in concrete would be devastating for the wildlife, and would have a knock on effect for the whole area.

Surely brownfield sites must be prioritised, rather than simply concreting over the countryside. We owe it to future generations to preserve such beautiful and diverse habitats, - not lose them forever.

**Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

**Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

**Worlingham Neighbourhood Plan Steering Group (John Coulson)**

As a resident of Worlingham my concerns are for the areas listed (82, 62, 60, 44).



Increase in traffic

Will local drainage be able to cope. A recent response to our Neighbourhood Plan group indicates that foul and surface water drainage is already virtually at its limit.

What will WDC do to improve facilities in Worlingham as we currently have no village hall, pub etc.

What will determine the number / rate of housebuilding in Worlingham?

Can you please differentiate between Worlingham and Beccles, they are not the same place!

Will the local plan consider a new doctors surgery in Worlingham.

What is WDC position with the Larkfleet housing proposal. When will you have establish what growth level you will be working with?

How will our neighbourhood plan be able to influence WDC planning?

When do we need to have our neighbourhood plan in place to be considered in WDC planning?

#### **Worlingham Parish Council (Lesley Beevor)**

It was agreed that the preferred development choice for Worlingham would be the site no. 60, or if not, then no. 44 – as these would be closest to the proposed southern relief road. This was AGREED by a majority with 1 abstain.

### **45 - Land at St Johns Road, Bungay**

#### **Anonymous**

Places labelled 55, 37 on the Bungay development map are areas not very well set up with infrastructure, they include already very built up urban areas. With this the land on St Johns Hill (45) would better be suited for housing and other leisure facilities.

#### **Dominic Belisario**

In past reports this area has been identified as an area at risk of flooding and that it would be inappropriate for housing to be built on it. In my opinion it should be regarded as "greenbelt" and should not be developed at all. The charm of living in Bungay is that there are wide open spaces just outside the town and this is gradually being eroded by ribbon development along major routes into the town. Development, with tall houses, cheek by jowl, linked by narrow roads filled with parked cars has already taken place on the opposite side of the road to this land and it does nothing to enhance the town. Therefore further development should not take place. Building on the "green" site would also reduce property prices in Fairfield, Kerrison and Mayfair Road as many properties back on this land which gives them highly sought after country view, whilst still living in the town.

#### **Maureen Davison**



### **OBJECTION TO FIELD NUMBER 45 BEING CONSIDERED FOR DEVELOPMENT**

This is greenbelt arable farmland at the rear of Kerrison and Fairfield Roads, which is fully utilized with crops, and is not laying fallow. There is a flood plain, also, a listed farmhouse on this land.

The 'Tin River' in Hillside Road East, by Mayfair Road and the Wherry Veterinary Group Practice, quite often floods over the A1062, as the water runs off of the Flood Plains to the lower level.

Articulated Lorries travelling on the A143, use the A1062 Hillside Road **West**, connecting them to A144 Bungay/Halesworth, and, A1062 Beccles via Hillside Road **East**; all converge at the staggered junction of St John's Hill.

The A1062 is single lane traffic from Hillside Road West, to the A143. Not only is the road narrow in places, but, there are sharp bends. Heavy rain leaves the road awash. It would need to be vastly improved to take any extra traffic from more new housing. In addition to the Articulated Lorries, It already has regular use by Lorries from the Gravel Pits.

The Bungay Leisure Centre on the A144 which is opposite this field, Number 45, is widely used from early morning to late evening and the car park is well used. However, cars entering the facility can hold up traffic. This doesn't appear to be an issue at the moment, but, with the increase in proposed housing, this might be problematic.

There is little or no employment available locally, so, new residents in the proposed 2% 150/190 homes, or the 4% 300/380 homes would need to travel to Beccles or Halesworth Railway Stations to commute to work. Consequently, the roads would have to take the increase in cars. There would also need to be more car parking spaces, in or around the Railway Stations. Also, we are talking of 150 to 380 **households** and not people

By building on farmland, it's likely that Bungay will be in danger of losing its own identity and be swallowed-up by expanding towards the surrounding towns. Particularly, as Bungay doesn't have a Railway Station; which are benefits enjoyed by both Beccles and Halesworth.

Relatively recently, the land in question had been ruled-out, in favour of the land behind the Bungay Leisure Centre. It is very worrying to think that even more time is being expended raking over the same issue. We understood that our previous objection was upheld and that 'the powers that be' were satisfied that this same field, No. 45, was **not** suitable.

#### **Maureen Davison**

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#### **Wilhelm Emrich**

Concerns about building new houses in BUNGAY – opposite the swimming pool towards Mettingham

1. Highly productive agriculture land would be destroyed.
2. The job situation in Bungay is not very positive.  
Newcomers would have to commute which causes additional congestion and air pollution.
3. The school facilities have not changed and would strain under more pupils.
4. The size of the Bungay surgery has not changed since it was built.
5. Wildlife Habitat:
  - a) Hedgehogs are wandering from the field into gardens and back.
  - b) Many songbirds and other birds are established.
  - c) Skylarks can be seen hovering over the open field.  
Their nests in the field would be destroyed.
6. Floods have occurred in the past.

#### **Richard Emrich and Fiona Emrich**

Emailing to raise concerns over proposed new housing development opposite Bungay swimming pool.

1. Not sure that Bungay has the resources for an increased population.
2. Hedgehogs nest, breed and hibernate in our garden. They forage in the field. Hedgehogs are partially protected by the Wildlife & Countryside Act.
3. Skylarks are regularly seen and heard over field, indicating that they nest there. The skylark is on the RSPB red list.
4. Field has flooded in the past.
5. People have been walking along the edge of the field for over 20 years. Under section 31 of the Highways



Act 1980 this should lead to it being designated as a public right of way.

**John Palin**

Bungay Site 45 is not suitable for housing because of its close proximity to a listed building and is on a floodplain, with the Tin River being on the lower edge of this site. This area often floods in the winter months and during periods of heavy rain where it drains from surrounding fields. The field at the moment forms a natural boundary to the town of Bungay.

**Diane Scott**

There is already outline planning permission for development of housing adjacent to the swimming pool on the other side of St. Johns Road

Further development of Site 45 would cause more traffic congestion with most traffic either going south to north through the centre or turning East towards Lowestoft through residential areas and school. It is not suitable to use before a bi-pass is built.

It was not included in the current plan as it is prone to flooding and expensive to develop and this has not changed. It would also lose valuable agricultural land.

Additional development on this scale would put too much pressure on public services such as has health, schools and sewerage.

**N/A (Peter Scott)**

This location was rejected in previous plans as it is liable to flood and is expensive and difficult to develop - this remains the case.

As outline planning permission has been given for house adjacent to Bungay swimming pool unless a by-pass is built further development at site 45 would cause traffic congestion. It would also put an unacceptable strain on public services such as schools and health services and lose valuable agricultural land.

**St John's Hall Farms (-)**

St John's Hall Farms can confirm that Site 45 (East of St John's Road, Bungay) is available for development, suitable and deliverable. If required, the landowner will discuss the potential for additional land to the south east of the site (up towards Dukes Farm) to be included as a comprehensive proposal for the area.

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**46 - Land at Swan Lane, Barnby**

**Charles Fortt**

The Barnby community and its parish council have registered strong objection to the development of this site as proposed by Badger Homes. It is outside the village boundary, disproportionately weighted towards affluent purchasers who will have no other ties to the village, and would put unreasonable traffic burden on the



narrow country lane that Swan Lane is. There is no local demand for detached, four-bedroom, executive-style houses that would make up much of this development.

**Robert Gill**

we oppose the inclusion of this site - for the same reasons as stated for site 57.

Also, this site has recently been the subject of an appeal by the developer which was rejected at appeal stage. The site should remain outside the physical limits.

**Tracy Morgan**

I object to the proposal of houses being built at this site. The site is extremely close to the Barnby nature reserve and Area of Special Scientific Interest. Roads, houses and pavements on this site will cause excess water to run off into this area and upset the delicate balance.

The lanes along this area are too narrow to allow two lanes of traffic to pass each other and are not designed for heavy traffic use.

Houses along Swan Lane, The Green and The Sidings are not on the mains for sewage and are not connected to gas mains.

The junction leaving Barnby on the A146 is already very busy in the mornings, with additional traffic, this will cause huge delays for residents leaving the village for work in the mornings.

The village Primary School cannot accommodate the potential increase in numbers.

**Tracy Morgan**

Below are the reasons I object to the development proposed at Swan Lane, Barnby

The area where the development is being proposed is uphill from an area of Special Site of Scientific Interest. Rain water will run off of the development directly to this area. This excess water, that cannot absorb into the land due to the development, would certainly upset the delicate balance of this rich and unique ecosystem.

The road infrastructure in this part of Barnby would simply not support the additional load the proposed development would bring with it. The lanes are pitifully narrow and they would in no way cope safely with the increased traffic. On a good day, it still takes me a while to safely exit from the junction from the village onto the A146, with the increase in flow, it will turn the junction into a real issue. There is also no mains sewage to support the proposed housing site and the local primary school is at its full capacity.

**Julie Reid**

This site is unsuitable for development for several reasons:

It is a greenfield site, outside the village boundary.

The land is currently in use for agriculture.



The access road is single track and in regular use by Pedestrians, Horse riders and Cyclists. An increase in traffic related to building development would significantly increase the danger to these road users.

The site is close to many natural habitats, including an SSSI. Development of this site would cause irreparable damage with loss of habitat.

This eastern aspect of the village is sparsely populated, and characterful. Any development at this site, would alter this irrevocably, and to its detriment.

The village has little infrastructure and amenities, and as such is unsuitable for developmental growth of this scope.

### **Charlotte Sanderson**

I feel that this development would be inappropriate for a number of reasons:

- ▶ This is currently a Greenfield site.
- ▶ It has been in constant use as agricultural land, and has only been used as a storage area by the garden centre over the past 10 years.
- ▶ It is outside the village envelope.
- ▶ The development would change the rural nature of the village and would lead to the suburbanisation of the area.
- ▶ I feel that this development would set an unacceptable precedent.
- ▶ We already experience low water pressure. 80 further properties would exacerbate this and would place pressure on existing sewage infrastructure.
- ▶ The field has been identified as having soil that freely drains. However, the lane is prone to flooding. With the increased run-off from these houses, patios, drives and
- ▶ roadways, this problem could be worsened.
- ▶ Barnby has no village shop, few places of employment, and no surgery. The school is full.
- ▶ The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 160 cars regularly using Swan Lane (and a likely 400 extra vehicle movements a day).
- ▶ Swan Lane is not wide enough to take the additional traffic and there would be greater likelihood of collisions, particularly close to the junction with Mill Lane and the Garden Centre.
- ▶ A wider impact would be the impact on the A146 which is already under huge strain due to increasing commuter traffic.
- ▶ Swan Lane is currently used by both North Cove and Barnby residents as a “breathing-space”. It is a quiet lane which forms part of a loop around the villages. People of all ages use it for running, walking, cycling, scooting and horse riding. It is particularly important for children and older people who need somewhere safe to exercise.
- ▶ Swan Lane is regularly used by horse riders, from the nearby Broads Equestrian Centre, who have developed an access route along the verge of the A146 to allow clients to enjoy this currently safe quiet lane.
- ▶ Swan Lane is currently used by over 15 children of all ages to get to and from the village and their school /school bus. With increased traffic movements and no footpath (not currently needed due to the rural nature of the lane) their safety would be further jeopardised and their independence may be curbed.
- ▶ The “soundscape” of this part of the village is likely to change in character. Other than the noise of the A146, it is quite quiet. You can hear farm animals and wildlife. This is an important feature of the villages “breathing space”. It is likely that a suburban housing development would add lawnmowers, radios and voices.
- ▶ The rural character of the night sky would change, with the addition of security lights and street lights.
- ▶ Any green space is of ecological value. Agricultural areas such as this field, its edges and hedges support a thriving population of wild flowers, insects, bats and birds (including skylarks). We regularly see barn owls



hunting and have occasionally seen a marsh harrier and buzzards. Deer regularly pass through.

I feel that if this development is allowed, it will be the thin end of the wedge, and there will be a characterless ribbon development between Lowestoft and Beccles along the already

overloaded A146.

**Paul turner**

I object to the proposal of houses being built at this site. The site is extremely close to the Barnby nature reserve and Area of Special Scientific Interest. Having roads, houses and pavements on this site will cause excess water to run off into this area and upset the delicate balance.

The lanes along this area are too narrow to allow two lanes of traffic to pass each other and are not designed for heavy traffic use.

Houses along Swan Lane, The Green and The Sidings are not on the mains for sewage and are not connected to gas mains.

The junction leaving Barnby on the A146 is already very busy in the mornings, with additional traffic, this will cause huge delays for residents leaving the village for work in the mornings.

The village Primary School cannot accommodate the potential increase in numbers.

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The road infrastructure in this part of Barnby would simply not support the additional load the proposed development would bring with it. The lanes are pitifully narrow and they would in no way cope safely with the increased traffic. On a good day, it still takes me a while to safely exit from the junction from the village onto the A146, with the increase in flow, it will turn the junction into a real issue. There is also no mains sewage to support the proposed housing site and the local primary school is at its full capacity.

**Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

**Barnby Parish Council (Ian Hinton)**

Between Swan Lane and Beccles Road (the Badger site). This has been the subject of applications on about one



quarter of this site – even this was considered excessive and rejected, so the whole site would be far too large – currently farm land.

**Ian Reid**

Unsuitable site for development. It is a greenfield site currently in use for agriculture. Single track access road is in regular use by pedestrians, horse riders and cyclists, any increase in traffic would significantly increase the danger to these road users, it is also close to the notorious Barnby bends. The site is close to many natural wildlife habitats including an SSSI and housing development would cause irreparable environmental damage.

**Broads Authority (Natalie Beal)**

Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.

**Historic England (Debbie Mack)**

Proximity to the Church of John the Baptist grade II\*. Potential impact upon setting of high grade Listed Building.

**North Cove Parish Council (Joan Pryce)**

Small amount of starter homes at western end

**NorCas**

Ribbon development adding to the excess of traffic on the A146

**47 - Land at the Former Garage, Somerleyton**

**Mr Peter Carrier**

Holy unsuitable sites for such massive builds, there is inadequate infrastructure (sewage, utilities and roads) such a project would ruin the outlying area, in addition This would take away good agricultural land growing food, a consideration for lowering the imports and potential local economy issues with the EU.

**David Cook**

We would like to object to the development of the above site for the following reasons:

The development is within the Conservation area and should not be considered.

There is already a considerable amount of traffic on Somerleyton Street (yes a street not a road). We have lived in the village since 2001 and have noticed a steady increase in the number of cars using the Street and parking



on the Street. New houses within the village would add to the amount of traffic and increase the number of traffic incidents.

There is already a Planning Application in place to allow the Petrol Station to be converted into a shop with parking at the rear of the premises. Access to any future development of this site would be through the former garage site thus increasing the amount of traffic entering or leaving the Street on a very dangerous corner, that at present, has no parking restrictions in place. Access to this site would be extremely close to existing properties and through traffic would be easily heard by the tenants of these properties.

As the proposed development of up to 16 properties is behind existing properties that front the Street, the new properties would overlook them and effectively, double up the properties on the Street. In our opinion this would start to erode the quaintness and traditional look of the village.

The site has been used as an oil distribution yard for at least the last 50 years. We have been informed that over the years, there has been several major spillages of oil from the tanks on the site. It is highly likely this would be revealed in any soil samples analysed and cleaning up the site would be an extremely costly and time consuming project.

David Cook and Jenny Anderson

#### **Paul Douch**

Potential for a small development of circa 6-8 houses or bungalows, incl starter & affordable

#### **Joy Jones**

If there must be new housing in Somerleyton then this is a site which could be developed without impinging on green space in the village. This site is also quite near to the junction to Lowestoft and in easy walking distance of the school. Housing in Somerleyton is not affordable to many young families trying to get on the housing ladder. Perhaps the idea of a small number of affordable houses for families, that are designed in a way that is sympathetic to the historic nature of the village, could be explored.

#### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

(The proposed site also includes the paddock behind the Post Office Stores). Some parts of this site are held by lease by third parties, the access shown is unsuitable, a large part of the garage site and oil storage yard is likely to be contaminated. However, the site is not completely rejected and it might be considered for a smaller number of houses than the indicative number and if the problems can be overcome.

#### **Historic England (Debbie Mack)**

Located within the Conservation Area, close to Somerleyton Park Historic Parks and Gardens and proximity to The Rosery and adjacent to a plethora of buildings and other historic assets around The Green including the village pump, The Old Farmhouse, County Primary School and a number of dwellings, all grade II listed. Potential impact upon Conservation Area, Historic Park and Garden and setting of Listed Buildings.

#### **Somerleyton Estate (Lord Somerleyton)**

#### **Site Description and Development Potential**



9.1 Site Option 47 is the former garage site and land located to the rear of the Post Office and would be accessed via 'Blacksmith's Loke' beside the garage which is land owned by The Estate. A plan of the site is included in Appendix 7.

9.2 The site is 0.64ha in size. According to Policy DM16 a density of 30dph would indicate a minimum of 19 dwellings (including 6 affordable homes) on this part of the site. **Mirroring surrounding development density we consider the site is could accommodate 12 to 15 dwellings.**

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

9.3 The site sustainability appraisal (SSA) at Points 1 and 4 refer to "limited village facilities". This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised.

### **48 - Land at The Green, Barnby**

#### **Ben Blower**

The development of this site would offer an opportunity to improve this part of the village by removing the rather unsightly old agricultural building and would provide enough space to combine some new housing with an open space that could become a proper village green giving this part of the village a focal point.

New housing in the village would support the existing rural businesses (garden centre, pub/restaurant, hairdresser) located there and improve the viability of the village primary school

#### **Tracy Morgan**

Below are the reasons I object to the development proposed at The Sidings.

The area where the development is being proposed is utterly unique and important, it is a green belt area, an intelligent and environmentally responsible ideal, one in which I deeply believe should be upheld and protected without question. A development of the size proposed would have a massively detrimental effect on both the landscape and wildlife, as well as the mental well being of the local residence, to see the area I love, deeply respect and appreciate changed beyond all recognition, would be personally soul destroying. The proposed development is located within a designated area of special scientific interest and a development would have an untold impact on the delicate balance of this rich and unique ecosystem.

The road infrastructure in this part of Barnby would simply not support the additional load the proposed development would bring with it. The lanes are pitifully narrow and they would in no way cope safely with the increased traffic. On a good day, it still takes me a while to safely exit from the junction from the village onto the a146, with the increase in flow, it will turn the junction into a real issue. There is also no mains sewage to support the proposed housing site and the local primary school is at its full capacity.

#### **Julie Reid**



This site is unsuitable for building development for a number of reasons:

It is adjacent to a SSSI, including Barnby Broad, and therefore is important corridor for wildlife.

The site is periodically farmed including animal grazing.

While outside the floodplain, it is well known for poor drainage.

It is outside current village boundaries, with no infrastructure - single track country lane access, no mains drainage, gas or street lighting.

A development here would create a steep increase in traffic levels on unsuitable quiet lanes with a consequent damaging effect on the environment for both people and wildlife.

Development of this site would significantly alter the character of the village, to its detriment.

### **Charlotte Sanderson**

I feel that this development would be inappropriate for a number of reasons:

- ▶ This is currently a Greenfield site.
- ▶ It is outside the village envelope.
- ▶ The development of 55 homes would change the very rural nature of this end of the village and would lead to the suburbanisation of the area.
- ▶ I feel that this development would set an unacceptable precedent.
- ▶ We already experience low water pressure. 55 further properties would exacerbate this and would place pressure on existing sewage infrastructure.
- ▶ The field has been identified as having soil that freely drains down to the marsh adjacent. The lane at this point is already prone to flooding. With the increased run-off (likely to be contaminated with phosphates, nitrates and plastics) from these houses, patios, drives and roadways, this problem could be exacerbated and may lead to the flooding of existing homes.
- ▶ This area drains into a SSSI and NNR, it is very close to the Broads National Park Boundary.
- ▶ This areas of rough grassland, that has not been treated with pesticides or herbicides for some years are increasingly rare. The grassland, edges and hedges provide habitats for a diverse plant and animal community. We regularly see a wider range of birds including barn owls hunting, skylarks, marsh harriers and buzzards, We have seasonal visits from swifts, swallows, hobbies, and a nightingale. Deer regularly pass through.
- ▶ Barnby has no village shop, few places of employment, and no surgery. The school is full.
- ▶ The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 110 cars regularly using Swan Lane (and add a likely 330 extra vehicle movements a day).
- ▶ Swan Lane is not wide enough to take the additional traffic and there would be greater likelihood of collisions, particularly close to the junction with Mill Lane and the Garden Centre.
- ▶ A wider impact would be the impact on the A146 which is already under huge strain due to increasing commuter traffic.
- ▶ Swan Lane is currently used by both North Cove and Barnby residents as a "breathing-space". It is a quiet lane which forms part of a loop around the villages. People of all ages use it for running, walking, cycling, scooting and horse riding. It is particularly important for children and older people who need somewhere safe to exercise.
- ▶ Swan Lane is regularly used by horse riders, from the nearby Broads Equestrian Centre, who have developed an access route along the verge of the A146 to allow clients to enjoy this currently safe quiet lane.
- ▶ Swan Lane is currently used by over 15 children of all ages to get to and from the village and their school /school bus. With increased traffic movements and no footpath (not currently needed due to the rural nature of the lane) their safety would be further jeopardised and their independence may be curbed.
- ▶ The "soundscape" of this part of the village is likely to change in character. Other than the noise of the A146,



it is quite quiet. You can hear farm animals and wildlife. This is an important feature of the villages “breathing space”. It is likely that a suburban housing development would add lawnmowers, radios and voices. The rural character of the night sky would change, with the addition of security lights and potentially street lights.

•

I feel that if this development is allowed, it will be the thin end of the wedge, and there will be a characterless ribbon development between Lowestoft and Beccles along the already

overloaded A146.

**Paul turner**

I object to the proposal of houses being built at this site. The site is extremely close to the Barnby nature reserve and Area of Special Scientific Interest. Having roads, houses and pavements on this site will cause excess water to run off into this area and upset the delicate balance.

The lanes along this area are too narrow to allow two lanes of traffic to pass each other and are not designed for heavy traffic use.

Houses along Swan Lane, The Green and The Sidings are not on the mains for sewage and are not connected to gas mains.

The junction leaving Barnby on the A146 is already very busy in the mornings, with additional traffic, this will cause huge delays for residents leaving the village for work in the mornings.

The village Primary School cannot accommodate the potial increase in numbers.

**Paul turner**

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The area where the development is being proposed is utterly unique and important, it is a green belt area, an intelligent and environmentally responsible ideal, one in which I deeply believe should be upheld and protected without question. A development of the size proposed would have a massively detrimental effect on both the landscape and wildlife, as well as the mental well being of the local residence, to see the area I love, deeply respect and appreciate changed beyond all recognition, would be personally soul destroying. The proposed development is located within a designated area of special scientific interest and a development would have an untold impact on the delicate balance of this rich and unique ecosystem.

The road infrastructure in this part of Barnby would simply not support the additional load the proposed development would bring with it. The lanes are pitifully narrow and they would in no way cope safely with the increased traffic. On a good day, it still takes me a while to safely exit from the junction from the village onto the a146, with the increase in flow, it will turn the junction into a real issue. There is also no mains sewage to support the proposed housing site and the local primary school which is at its full capacity,

**Badger Building (Edward Gilder)**



We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

**Barnby Parish Council (Ian Hinton)**

Fields off Siding Road – far too big for a small village and relying entirely on Swan Lane to exit on to the main road – currently farm land.

**Ian Reid**

This site is unsuitable for housing development - it is adjacent to a SSSI and thus any development would have a detrimental effect on the environment.

The site is outside the village boundary and would constitute an out-of-proportion extension to the village.

The site is prone to periodic flooding, there is no infrastructure to support a housing development, and access is via a single-track country lane

**Broads Authority (Natalie Beal)**

Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.

**Historic England (Debbie Mack)**

Proximity to church of John the Baptist Grade II\*. Potential impact upon setting of high grade Listed Building.

**North Cove Parish Council (Joan Pryce)**

Visually intrusive, access terrible development into the open countryside

**49 - Land at The Homestead, Lound Road, Blundeston**

**Helen BROWN**

I appreciate the council have to fulfil their development plans but feel strongly that this shouldn't be to the detriment of village life. Blundeston has a strong rural background but is slowly being eroded away by developments on Greenfield areas. The proposed seventeen houses for this site would increase traffic by approximately 24-34 vehicles which would either have to come down through the village or exit the village on to Flixton road (60mph speed limit) at a junction which is located on a blind bend.



I struggle to see how the council would think this was acceptable.

Surly the council should be looking more at locations such as the old prison site in Blundeston that is a Brownfield site and obviously requires redevelopment. This site is of substantial size and I feel that this would be more than enough development for Blundeston at this present time.

**Lisa Doyle**

Sites 27, 129, 49, same main reason of extra traffic as sites mentioned above. Sites 20 and 63 are better situated with access from Flixton Road, which would keep extra vehicles away from village, but still too many houses proposed for sites, these could potentially create an extra 600 vehicles on small roads.

**andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

**John Mitchell**

Site 49 for 17 houses would appear to again have access problems, as this corner is extremely dangerous.

**Bruce Rayner**

Site 49

Plan indicates that housing demand may exceed supply and that there may be a requirement for a further 8,000 homes before 2036. Before large areas of the locality are built upon, are the Council certain of the requirement? It would seem irresponsible to build numerous 'white elephants'. Is this not merely a function of the Government's policy to build a specified number of homes but without certainty of need in this area?

Plan indicates there are already 3,141 new homes in the pipeline plus a further 633 anticipated. That would seem to be enough for the present until precise requirements are known.

Comments are:

- a) Most employment is South of the river. Blundeston is to the North.
- b) Transport in Blundeston is poor, there is bad road access and it is dangerous even with low traffic. Sites 164-



165 are better served.

c) Site does not benefit from obvious safe and easy access.

d) Why spoil such a beautiful area, enjoyed by tourists, local runners and cyclists? Further traffic would be a hazard.

e) As a Chartered Surveyor, your numbers per hectare do not appear to be accurate.

f) There are no amenities in Blundeston, not even a village shop for milk, bread, etc.

g) There is no regular bus service. Increased traffic to get in and out of the village is an environmental issue. Areas identified South of Lowestoft are already served by public transport and allocated safe cycle routes.

h) Properties in Blundeston are mature. New homes next to what are already new homes in Carlton Colville would be much better.

i) By publishing this document you seem to have added planning blight to nearly all of the homes surrounding Lowestoft for no apparent reason.

j) Building 456 new homes in Blundeston would almost double the population of the village, surely not desirable, sensible or necessary.

k) Current essential services /supply are limited. At certain times of the day, water pressure is very low.

l) Risk of flooding through rainfall if a concrete jungle is built - sewers can't cope.

m) Broadband is slow and mobile phone signal is bad.

n) Development on the prison site is already ample for the village to cope with.

o) Blundeston is inhabited by lots of wildlife - there are owls, newts, hedgehogs, etc. I've heard baby owls calling to their parents from our house. Some of these species are becoming rare. Why destroy these areas when there are alternatives?

It makes far more sense to build on the sites identified in Carlton Colville. The proper infrastructure could be put in place in one designated area. Why spoil beautiful landscapes, upset huge numbers of the local population and potentially decrease tourism and enjoyment of the areas outlined.

#### **Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

#### **Historic England (Debbie Mack)**

Proximity to Historic Park and Garden - Somerleyton Park. Potential impact upon the Park and its setting.

#### **N/A (Tim caley)**



This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are constantly clogged with school traffic.

**n/a (Alan Yardy)**

This site and its frontage to Lound Road suffer from significant surface water drainage problems. During winter periods surface water, from this site, floods the Public Footpath which runs from Lound Road to the Flixton Road and no adequate drainage arrangement exists. Any proposed development should address this matter.

## 50 - Land at the junction of Copland Way and the A146, North Cove

**Nicky Elliott**

I feel this land should not be developed as it is away from any existing facilities and services and other residential areas.

**Charlotte Sanderson**

Not a sustainable place to build 69 houses. The occupants would be completely reliant on a car as there are no services in the area.

This will contribute to a characterless ribbon development between Lowestoft and Beccles along the already overloaded A146.

**Historic England (Debbie Mack)**

Proximity to Church of St Botolph, grade I listed to the north and grade II Three Horseshoes Public House. Potential impact upon setting high grade and other listed buildings.

**Personal (Jonathan Blankley)**

There can be no logic to building housing on this site. It is too close to the industrial area, and too far from existing housing.

**NorCas**



Any development along the line of the A146 is going to add to the overloading of this road.

### **Suffolk County Council (James Cutting)**

The county council welcomes the reference to the Beccles South Relief Road and encourages the district authority to mark the route on the Beccles site map. Subject to any further assessments, the proposed level of growth around Beccles is generally acceptable with the exception of the following sites 124, 50, 71, and 77 since these are all further out from the town centre and less likely to encourage sustainable travel choices.

## **51 - Land at The Old Rectory, Church Lane, Oulton**

### **Annette Collen**

We have the following additional points to make in respect of site 51, Land at The Old Rectory, Church Lane, Oulton, NR32 5DP

Point 1 - To improve the health and well-being of the local population:

The site has easy access to local services and facilities being on the edge of the established settlement. A couple of convenience stores and a primary school are within easy walking distance of the site. There is a bus stop less than 100 yards from the site entrance and a doctors surgery, train station (Oulton Broad North) and the new Enterprise Zone at Mobbs Way are all accessible on foot or by bicycle.

A public footpath runs along the side of the site down to marshes and open countryside.

Point 4 - To improve access to key services and facilities:

The site has two separate access leading on to the public highway which are used by the existing dwelling, one leading onto Church Avenue towards Camps Heath and the other onto Church Lane.

There are no existing public rights of way over the site. However there is a footpath which runs alongside the Church Lane entrance to the site and affords access to the Church and marshes.

Oulton Primary School is less than a minutes walk from the Church Road site entrance and there is a post office and newsagents within walking distance of the site. The Peto Way Retail Park is approximately 5 minutes by car from the site and is also accessible by bus.

There are a number of nearby public bus services, the closest bus stops being at the end of Sands Lane. The buses provide regular connections to Lowestoft, Great Yarmouth, Southwold and beyond. The two Oulton Broad stations both provide good links to Norwich, Ipswich and the wider rail network.

Primary access would be from the Church Lane entrance.

Policy 10 of the National Planning Policy Framework ("NPPF") refers to the need for LPA's to take local circumstances into account (which in this case include the new energy related jobs at the Lowestoft Port and creation of the nearby Enterprise Zone at Mobbs Way) to respond to different opportunities to achieve sustainable development.

Development of site 51 would assist with the provision of much needed housing for the influx of people that is anticipated will be moving into the district in the next decade in connection with initiatives such as the Waveney energy hub and Mobbs Way Enterprise Zone.



Point 6 – To meet the housing requirements of the whole community:

The NPPF places great emphasis on sustainable development and it is a fundamental requirement of development proposals that they satisfy the three principles of sustainability, social, economic and environmental, as set out in paragraph 7 of the framework.

Section 6 of the NPPF places a requirement on Local Planning authorities to:

“...use their evidence base to ensure Local plans meet the full objectively assessed needs for market and affordable housing in the housing market area, so far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

Additional requirements of the NPPF are the need for sites to be deliverable and developable. To be considered deliverable, “...sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development site is viable”.

To be considered developable “...sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at this point envisaged”.

It is our view that this complies with all of these specific requirements.

The WDC Strategic Housing and Economic Land Availability Assessment Methodology Consultation Document – Oct 2015 repeats the requirements of the NPPF in terms of assessing whether sites are Deliverable or Developable.

In this document “deliverable sites” are defined as sites which are suitable, available now and achievable within five years. Site no 51, comprising land at The Old Rectory, Church Lane, Oulton meets all of these requirements.

“Developable sites” are described as sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period.

The document states that a site will normally be considered “Available” if it is within the ownership of a developer who has expressed an intention to develop / sell the land for development. This site meets this requirement.

A site will be considered “Achievable” where there is reasonable prospect that development will occur on the site at a particular time. A key factor is the economic viability of the site. Influences include market attractiveness, the location of the site and any abnormal constraints on the site. Oulton is a very popular place to live, which commands an extremely strong position in the local housing market. There are no known abnormal constraints on developing this site. We consider therefore this site meets the requirements that allow it to be considered achievable.

Point 7 – To maintain air quality:

Proximity to the town centre and pedestrian / cyclist routes should mean less traffic movements than there would be with an out of town development.

Point 8 – To maintain and improve water quality:

Anglian Water has confirmed there is capacity in the nearby sewerage treatment network and foul drainage systems for development in this area. Surface water disposal would be covered in the design brief.



Point 9 – To conserve and enhance the quality and distinctiveness of landscape and townscapes:

The potential of the site for housing would be optimised by building a small number of high quality houses to fit in with the secluded woodland surroundings, enabling the preservation of the many trees, fauna and wild life. This is in accordance with the stated aims of Policy 58 of the NPPF which refers to planning policies and decisions aiming to optimise the potential of sites. Policy 159 of the NPPF refers specifically to LPA 's identifying a scale and mix of housing. This development (which could include self build) would be an alternative to large estate type development and could address the needs of some of the people who wish to build their own homes.

Policy 69 of the NPPF refers to the promotion of healthy communities and to planning policies and decisions which achieve places providing safe and accessible environments and ensure that established shops, facilities and services can develop and modernise and be retained for the benefit of the community. A small-scale development on site 51 would support and bring more custom to local businesses without overloading existing infrastructure or causing the need for any major infrastructure works.

The site is very close to a number of existing residential developments, including Sands Lane, Woods Lane, Church Lane, Whiting Road etc. The trees bounding the site would provide an effective screen stopping the development having any impact on the existing local landscape. The site could be totally discreet. The existing house on the site would use the rear access onto Church Avenue.

Point 10 - To reduce contributions to climate change and mitigate the effects:

Travel by car is not essential from this site with it's close proximity to the towns of Oulton Broad and Lowestoft and good transport links to Great Yarmouth, Norwich and Beccles.

Point 11- To consider natural resources:

The land is low quality grassland which is too small to be economically viable for use as a small holding. It has been used for occasional grazing in the past. NPPF 112 refers to local planning authorities prioritising areas of poorer quality land for development in preference to higher quality agricultural land.

Point 12 – To conserve and enhance biodiversity and geodiversity:

The site stands high and there is no flood risk to the site. Development strategy would ensure there is no offsite flood risk either. Appropriate measures will be taken at the design stage to allow for drainage from the site.

Policy 101 of the NPPF refers to new development being steered towards areas with the lowest probability of flooding.

The intention would be to develop the site without loss or removal of ANY significant trees or woodland and on a scale "appropriate to its location" in accordance with policy 120 of the NPPF. The aim would be to "promote the preservation, restoration and recreation of priority habitats, ecological networks and priority species populations" thereby conserving and enhancing biodiversity. The retention and improvement of Annabel's Spinney would be an integral part of any design brief.

Point 14 – To achieve sustained and realistic economic growth.

Economic growth generally would be stimulated by the provision of a choice of homes near to the town, business parks and Enterprise Zone. NPPF policy 23 requires LPA's to recognize town centres as being the heart of communities and requires policies which support their viability and vitality. The forecast in Waveney's core strategy was for over 5,000 new jobs in the district by 2025.

The adopted Core Strategy (CS) identified a need for 6,960 homes to be built in Waveney between 2001-2025 at an average rate of 290/ year. The WDC AMR 2014/2015 confirms that the total number of dwellings completed up to March 31st 2015 is in line with the CS requirements but annual completions for the last



couple of years have been significantly less than the annual target of 290.

The new Local Plan will cover the period up to 2036. It is acknowledged there is a need to plan for significant growth. Waveney's population is both a growing and ageing one. Between 2011 (the date of the last census) and 2036 it is forecast that the population of the district will grow by at least 8000. It has also been confirmed that more people are moving into the area than leaving it and households are getting smaller. Even with no population growth therefore there is a need to plan for more housing. The consultation document "Options for the New Local Plan" identifies three different growth scenarios which show different levels of housing and economic growth during the local plan period. Annual housing growth could range from 308 dwellings (dw)/year, 340dw/year or 380 dw/ year. The document also proposes four different options for how growth and development should be distributed throughout the district, with Lowestoft accommodating a minimum of 55% of proposed new development and potentially up to 75%. Whichever one of the options for growth outlined in the consultation document is decided, significant growth is still anticipated for Lowestoft and its environs including Oulton and Oulton Broad.

Development on this existing settlement would help WDC meet its housing targets and would offer an alternative type of housing to the nearby Woods Loke development and other large scale projects and could help satisfy some of the housing needs arising from the energy and creative hub at the Lowestoft Port and at the Mobbs Way Enterprise Zone.

An established local developer has committed to the early development of the site, subject to a satisfactory Planning Permission.

Policy 14 of the NPPF requires LPA's to "positively seek opportunities to meet the development needs of their area".

The development itself will create new jobs during the construction phase and provide opportunity for a range of associated service providers once complete.

Point 16 – To enhance the viability and vitality of town centres.

Policy 23 of the NPPF refers to the promotion of competitive town centres with more choice and offerings and to the important role played by residential development in this respect. Increased town centre investment would be encouraged by increased footfall and from new spend from nearby housing developments in locations such as site 51, where travel links and routes are easy.

Policy 24 of the NPPF refers to preference being given in out of town centre proposals to "accessible sites that are well connected to the town centre".

Site 51 satisfies both of these requirements.

Point 17 – To encourage efficient patterns of movement in support of economic growth

The site is within cycling distance of existing employment areas including Peto Way Retail Park, Mobbs Way and the new Mobbs Way Enterprise Zone.

#### **Adam Skinner**

this land is suitable for development and has pretty good transport links and facilities. The school should take more pupils from local area rather than half way across town

#### **Broads Authority (Natalie Beal)**

Sites 18/53/51 Camps Heath area. There are existing pressures on Oulton Broad marshes relating to land use. I



believe there is an article 4 direction on the land now. Additional housing may add to these pressures as well on the marshes as a recreational resource.

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### **Historic England (Debbie Mack)**

Close to Church of St Michael, grade I listed building. Potential impact upon setting of high grade listed building (though maybe screened by The Spinney)

### **Oulton Parish Council (Carolyn Gosling)**

• Sites not suitable for development:

51 Land at the Old Rectory, Church Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 18; 23; 51; 53 and 96 are in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

## **52 - Land at Toodley Farm, Station Road, Brampton with Stoven**

### **Historic England (Debbie Mack)**

Proximity of Shingle Hall and Brampton Old Hall, both grade II listed. Potential impact on settings of listed buildings.

## **53 - Land between Church Lane and Church Avenue, Oulton**

### **Messrs Munnings and Jermy**

1.0 The "Initial sustainability Appraisal of Emerging Options" is encouraging in that there are several positive



points :

- Improving health and wellbeing
- Improvement to access to key services
- Meeting housing requirements
- Encouraging efficient patterns of movement and Economic growth

Whilst the only negative points identified relate to

- (a) Conserving distinctive landscape
- (b) Conserving Natural Resources
- (c) To reduce contribution to climate change and mitigate effects”

With regard to (a) & (b) it is inevitable that there will be negative issues around these based on potential use of Greenfield land, but this situation applies to the vast majority of sites being promoted through the overall land bid exercise.

2.0 The site offers potentially up to 48 dwellings (LPA estimate) and although largely a greenfield site it is located immediately adjacent to the built up area at the western end of Lowestoft. It is within 50 metres of the Woods Meadow residential site to the north east. (presently under construction involving Circa 800 dwellings). In any event within the present search for sites, the LPA has also recognised that greenfield development is inevitable.

3.0 As stated above, the site is adjacent to existing and proposed housing and is within walking distance of a primary school, a shop and public transport facilities. Once the Woods Meadow site is established Site 53 will be reasonably close to additional retail facilities, a community hall, medical centre, primary school, play areas and a country park; together with further public transport facilities. It is therefore in a very sustainable location. To suggest, as the LPA has done in its initial Sustainability Assessment, that a hedge on the western boundary of the Whiting estate to the east of the site forms a “natural edge” to the built form, does not take into account the existing housing stock and related development to the north, north west, south and south west, as well as the ongoing Woods Meadow development to the north east as referred to above, in the vicinity of this the site; nor does it take into account Site 96 close to St Michaels Church to the west and much closer to the area covered by the Broads Authority. However, it is acknowledged that the surroundings to the immediate west are semi-rural and therefore a lower density development as suggested by the LPA may be more appropriate. Whilst acknowledging this position, it should also be borne in mind that Site 53 could bring about highway improvements to a concealed junction where Church Lane and Sands Lane converge close to the Oulton Broad Primary school adjacent to the site.

4.0 In acknowledging that a lower density scheme may be more suitable and given that the LPA has arrived at similar conclusions for Sites 18 & 51 to the north and south respectively, then a consolidated approach involving either or both these sites could provide a balanced, attractive and discrete development opportunity. With or without these other sites it is likely that developing Site 53 could provide highway improvements in an area close to a primary school where there is presently a blind bend where 3 roads converge.

5.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

6.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall; and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF.



7.0 Concentrating on Site 53 on its own merits, it is also understood that there are no viability issues and therefore development could be delivered swiftly, and in so doing help to contribute towards the required 5YHLS and its Housing Strategy, with the support of the LPA.

#### **Broads Authority (Natalie Beal)**

Sites 18/53/51 Camps Heath area. There are existing pressures on Oulton Broad marshes relating to land use. I believe there is an article 4 direction on the land now. Additional housing may add to these pressures as well on the marshes as a recreational resource.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx5>

#### **Historic England (Debbie Mack)**

Close to Church of St Michael, grade I listed building. Potential impact upon setting of high grade listed building (though maybe screened by The Spinney)

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

53 Land between Church Lane and Church Avenue

We do not consider this site suitable for development due to poor access and egress road infrastructure.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 18; 23; 51; 53 and 96 are in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

### **54 - Land between Harbour Road and the west end of the old Shell site, Lowestoft**

#### **Peter Eyres**

This site includes a public footpath along the shore of Lake Lothing and a well-established but informal cycle track along the top of the bank, beside the railway line, from the footbridge over the railway to Harbour Road. In any development, this route must be included as a formal cycle route: it is the landing for the proposed cycle/pedestrian bridge over the railway from behind Constable Close and it will connect to the



proposed cycle/pedestrian bridge from Brooke Peninsula (p. 16 of consultation document).

### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 54; 84; and 129 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

## **55 - Land between Pilgrim's Way and Wingfield Street, Bungay**

### **Anonymous**

Places labelled 55, 37 on the Bungay development map are areas not very well set up with infrastructure, they include already very built up urban areas. With this the land on St Johns Hill (45) would better be suited for housing and other leisure facilities.

### **John Hazelwood**

This site is one of the last remaining open spaces in the town and should not be considered for housing. The site should be reserved for recreational/amenities use for future generations.

### **Tracey Holmes**

This site is always coming up for discussion for development. My Mum lives on St Johns Rd and she has the following concerns.

1. When the Pilgrims Way development was built, the builders elevated the ground and disposed of the ditch which always ran around this field with no thought for the local residents. As a result, though it NEVER did before, when it rains, my Mum's garden now floods. If the old allotment field was to be built on and they again elevated the field (as like the old Watts field onto which Pilgrims way was built, the allotment field is also the lowest point) then surplus water would go onto surrounding properties and the flooding would be horrendous.

2. There is no decent access to the site. The lane to the allotments is too narrow and privately owned. Wingfield St is too narrow to support even more traffic and there is a school there. Access through Pilgrims Way means even more traffic coming out of the junction onto St Johns Rd which is already lethal- my niece has just had an accident there - caused partly because of the cars parked outside residences at around no 41 St Johns Rd onwards- when Pilgrims way was built the front gardens were purchased so that there was better visibility coming out of Pilgrims way and the residents were given garages at the bottoms of the gardens so they could park their cars there and of course they don't. So that junction would be even busier and still lethal.

My own thought is that this field should be given to the town as a recreation area, as there is no piece of nice green land (except for the Castle Hills) where residents and especially children can go to relax and play



football.

### **Halsbury Homes Ltd (Michael Goldney)**

As you will be aware, my client, Halsbury Homes, submitted details of the above site in response to your 'Call for Sites' in Autumn 2015, and it is shown as potential land for development in the 'Help plan our future: options for the new Waveney Local Plan' document which is currently out for consultation (Site 55).

The site is presently allocated under Policy BUN5 for Allotments/Open Space in the Waveney Site Allocations Development Plan Document. I note from the supporting text that the land "has been protected for allotment use and an important open space in the built up area for many years." The supporting text also notes that "most of the site falls within an area of medium flood risk (flood zone 2), taking into account climatechange."

Whilst site 55 has not been formally assessed for its potential for residential development, RPS is given to understand these are the two principal areas of concern that the Local Planning Authority has in relation to ability of this site to yield much needed housing.

The Local Planning Authority's aspirations in terms of creating allotments on this site are understood, although, the site has stood derelict for many years since the site was last used, and efforts to realise these ambitions since the Waveney Site Allocations Development Plan Document was adopted in 2011 have been unsuccessful. Halsbury Homes has the controlling interest in the land at St. Johns Road, and there is now no realistic long-term prospect of the site being returned to allotment use.

In terms of flood risk, I have consulted the Environment Agency's Flood Map (extract enclosed). This shows clearly that the whole site is in flood zone 1 (less than a 0.1 per cent (1 in 1000) chance of flooding occurring each year).

The Local Planning Authority's concerns about Site 55 are therefore without foundation

Bungay is one of the principal settlements in the District where under Policy CS01 of the Core Strategy, it is classified as a market town which, along with Beccles, Worlingham, Halesworth and Southwold, will accommodate approximately 15-25% of the District's housing growth.

The site is approximately 400m to the south east of town centre, which has a good range of shops and other services and facilities. Site 55 is therefore in a sustainable location within a sustainable settlement, and it is considered that there are no sound planning reasons why the site could not come forward during the Local Plan period.

I would therefore welcome the opportunity to discuss with how this site could contribute to meeting the District's objectively assessed housing needs.

### **Historic England (Debbie Mack)**

Adjacent to Bungay Conservation Area, 14 Wingfield Street Grade II and close to 5-11 Wingfield Street, also Grade II. Potential impact on Conservation Area and setting of Listed Buildings.

### **Didy Ward**

This is designated as allotment land. There is no vehicular access to the land and potential access points at Wingfield Street or Pilgrims Way would cause nuisance and congestion. The land floods on the south side. The drainage serving the houses on St. John's Road, immediately next to the site, have long-standing



drainage problems. Any development on this land would exacerbate that.

Speculative plans were brought by the owner to Bungay Town Council a few years ago for a nursing home for people with dementia and a few 'allotment' sites on the south side (where it floods) offered as a sop to the town. It was also stated at the time that this would bring jobs to the town as carers would be needed. However the owner runs a business which provides care workers to nursing homes, recruited primarily from Eastern Europe. This was not disclosed at the presentation to the Town Council.

The only thing the owner has done to the land since purchasing it is fell the fruit and other trees that were on it (during nesting season). But as wild land it offers habitat for wildlife and a 'green lung' for all of the residential areas which surround the land.

WDC has always been adamant that this land should remain as allotment land. I sincerely hope that this will remain the case. The only other allotment land in Bungay is at Flixton Road where there are insufficient plots to meet demand.

### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 37 and 55 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

## **56 - Land between Rushmere Road and Fairhead Loke, Gisleham**

### **Andrew Deal**

This site is directly opposite the local middle school.

Site access would need to be onto a country road which is narrow, has poor visibility and is subject to regular parking to the adjacent school. A new access would aggravate this situation causing further parking problems and congestion.

Where would foul and surface water discharge to? The latter would probably end up in Kirkley Stream which regularly causes flooding in the area.

Can the local school accommodate the additional children that would be generated from this proposal?

The site appears to be outside of the natural development area of the neighbourhood & would encroach into open countryside.

### **Keith Winter**

The "Initial sustainability Appraisal of Emerging Options" paper is encouraging in that the only negative points identified relate to;

- (A) "conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (B) "reducing contributions to climate change and mitigate effects"
- (C) "Conserving natural resources"



In response to item (A), whilst this is certainly a matter for consideration, we believe this potential issue can be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. With regard to items (B) and (C), considering Site 56 is Greenfield land, it is often the case that potential issues can be identified in relation to these matters, however given the scale and situation of the site, we believe that a potential development could be designed to involve particular features and infrastructure improvements to mitigate and counteract these potential issues.

The site extends to approximately 5.58 hectares and could accommodate up to approximately 165 dwellings (based on an assumed 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

The site is potentially accessibly to the north via Fairhead Loke, subject to some highways improvement works, and is currently accessible via Rushmere Road to the south. It is adjacent to Carlton Colville Primary School and is situated within cycling and walking distance from Lowestoft, a key area for prospective employment growth over the coming plan period.

There may be some potential synergies between the development of the site and a possible solution to the existing traffic congestion issues associated with Carlton Colville Primary School, which could involve some of our client's further land holding to the south of the school. This potential strategy has, to date, only been discussed in principle, and is a matter that requires further attention in due course.

Subsequent to the previous narrative, we consider the site to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation to this site.

#### **Gisleham Parish Council (E Rivett)**

Gisleham Parish Council asks that consideration be given to the following comments and observations in respect of the possible allocation of land for the development of 110 properties. This parcel of land adjoins farmland and the proposed entrance onto Rushmere Road is a busy road and the only access to the site is on a blind bend which cars travelling from Henstead, Rushmere and Mutford use to access the South Lowestoft Industrial Estate and the town centre.

1) ROAD - As mentioned above this is a busy rural road and to access the possible site of 110 properties which could produce more than 200 cars is unacceptable. The road could be widened by taking land from the school playing field and a small section of farmland to the south. This would however increase the speed of traffic entering a built up area, and the dangers arising from this could be considerable.

2) FOOTPATH - There is no footpath from the site until Carter's Garage is reached some distance from the site entrance. There are properties along this stretch of road, but in some cases the front gardens are close to the existing carriageway.

3) FLOODING - Rushmere Road regularly floods at times of heavy rains, close to where the site entrance might be; this water could drain towards the properties and there is a possibility that properties could be affected.

4) SEWERAGE - The Parish Council is not currently aware of any problems with the current system, but this may not be the case if a large number of properties are to be built in this location.

5) INFRASTRUCTURE - Carlton Colville Primary School would not cope with what could be an extra 150 or more pupils, and would have to be extended and this would exacerbate the parking problems both in Gisleham Road and Rushmere Road. There are two doctors' surgeries but again there are not sufficient doctors available for current needs or indeed for a large influx of patients. There are small local shops in Fadona Road, but their premises are totally inadequate for an increase in population in the area and the services at these shops are limited. Potential customers would need to drive to these shops where there is little parking and the traffic



flow along Rushmere Road to The Street is not suitable for this increase.

6) ENVIRONMENT- Construction for this size of development is potentially around 20 to 24 months, this road would not cope with the disruption that this would cause bearing in mind the proximity to the school and the width of the carriageway. There are no known particular habitats for wildlife, but there is an area of 'set aside' along the eastern boundary which is potentially an area for small mammals and birds and various varieties of flowering plant providing much needed food for bees and other insects. There are bats in the locality.

7) LIGHTING - This site is some distance away from development, and adjoins open farmland, to install the necessary lighting would cause excessive light pollution thus taking away another section of night sky from the rural countryside. The Parish Council asks that these concerns are taken into account and considered very carefully when your department decides upon the future of this parcel of land.

## 57 - Land between The Street and A146, Barnby

### Robert Gill

This site is outside the current physical limits of development in Barnby. Previous development plan consultations have proposed the use of this site and each time this has been vigorously opposed by the local population and we anticipate the same response this time. We strongly oppose the inclusion of this site.

Building on this site will:

detract from the rural environment

significantly increase traffic to an already dangerous junction

overstretch the limited facilities and infrastructure of the village, including the school

there are no shops in Barnby or North Cove

the site is productive farm land

the site is adjacent to a busy main road and it is questionable how attractive houses would be to potential purchasers

Barnby is subject to flooding. The planning application on a nearby site has been delayed due to Environment Agency concerns about flooding.

### Julie Reid

Restricted development on this site may be appropriate.

Any development should be small, and remain so, given the damage which would be caused by large growth, which would damage the character of the village.

### Charlotte Sanderson



- ▶ The scale of this development is far too big.
- ▶ The development of 52 homes would further add to the suburbanisation of this area.
- ▶ 52 homes would place pressure on the struggling existing sewage infrastructure.
- ▶ Barnby has no village shop, few places of employment, and no surgery. The school is full.
- ▶ The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 104 cars regularly joining the A146 (and add a likely 156 extra vehicle movements a day). There would be greater likelihood of collisions, and increased levels of air pollution close to the village school.
- ▶ There would be increased light pollution in this part of village with the addition of security lights and potentially street lights.
- ▶ The scale of this development would contribute to a characterless ribbon development between Lowestoft and Beccles along the already overloaded A146.
- ▶ I feel that this development would set an unacceptable precedent.

#### **Barnby Parish Council (Ian Hinton)**

Also a large site, but perhaps development of part of this site might be the best of a bad bunch, to help alleviate overall demand for new housing and “satisfy” Barnby’s contribution, as it does not require all traffic to pass through the village to access the site – currently farmland.

#### **Ian Reid**

Greenfield site currently in agricultural use. The size of the site is inappropriate to the size of the village - there is insufficient infrastructure to support a large development of this type.

#### **Broads Authority (Natalie Beal)**

Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.

#### **North Cove Parish Council (Joan Pryce)**

Open space visually important high would dominate landscape. Sewerage facilities inadequate

#### **NorCas**

There will be enough strain on the a146 without further development. Anyone living in the Barnby area will



need transport and this will probably be a car..

## 58 - Land east of 17-25 Sotherton Corner, Sotherton / Wangford with Henham

### Tim Madden

I claim a vested interest as the owner of a house immediately adjacent to the potential land for development.

I consider this proposal as inappropriate for the following reason:

1. Any development in this hamlet would be unsuitable as there is a total lack of amenities of any sort - no school, shop, church, pub, or playground.
2. There is no bus route and the nearest bus stop must be over two miles distant.
3. All approach roads are single carriageway and dangerous at the best of times when used by large agricultural machinery.
4. The proposed development size is out of all proportion to the existing size of the hamlet - currently some 24 dwellings.
5. Current owners have chosen to leave in Sotherton Corner precisely for what it is - a small, peaceful hamlet with uninterrupted rural views.

### Rosemary Parry

This is a very small area with no public transport and other services are very limited, it simply cannot sustain any increase in dwellings. The road here is single track and it is simply not feasible to support any more traffic. The schools and health services are struggling and would be at breaking point if were forced to accept such a steep increase in demand.

The broadband is pitiful so much so that the residents almost have to share the signal width and that's on a good day.

Parish Councillor

### Mary Seward

The following considerations seem relevant to the possible development at site number 58 (Sotherton Corner):

1. There are no amenities whatsoever at Sotherton Corner. This would inevitably result in car journeys for all services such as schools and shopping.
2. The site can be approached only by minor roads which are narrow and currently in poor repair. In many places the roads in the immediate vicinity of Sotherton Corner are single file.
3. From a subjective point of view, the indicative number of homes (54) is approximately twice the number of dwellings in the existing hamlet. This would fundamentally change the nature of the rural location and seems disproportionate to the site.



Sotherton Corner homeowner

### Claire Thurlow

This very rural site totally unsustainable for housing purposes. There is no bus service, mains sewerage, and the road is narrow and already subject to congestion from lorries to the farm, commuters to the Bernard Mathews factory. The lack of sufficient off road parking at the Council properties makes negotiating the village very difficult when school buses and bin lorries are present. The area is also a wildlife haven with trees, hedges and farm land linking small blocks of woodland. The row of old traditional farm workers cottages numbers 19 -23 have been popular holiday lets and bring tourism and income into the area. Several have recently sold to return to holiday lets. Development of the land in front of the cottages (they are at a right angle to the lane and over look the plot) would devalue these properties and drive tourism out of Sotherton.

### Historic England (Debbie Mack)

Sotherton Hall and Barn grade II to north west and Valley Farmhouse, 2 Barns and service Range, all grade II listed. Potential impact upon setting of several Listed Buildings

## 59 - Land east of Charters Piece, Willingham

### Historic England (Debbie Mack)

Close to Fox Farmhouse, grade II listed building to north. Potential impact on setting of listed building.

### Sotterley Estate (-)

#### Site Description and Development Potential

7.1 Site Option 59 is located east of Charters Piece in Willingham. A plan of the site is included in Appendix 6.

7.2 The site is 1ha in size and is well related to the built form of the village. It is a rectangular shape and has a flat topography.

7.3 According to Policy DM16 a density of 30dph would indicate a minimum of 30 dwellings on this part of the site.

**7.4 More appropriately and reflecting the density of surrounding development this site would provide for around 20 dwellings (including 6 affordable homes) arranged in a manner sympathetic to the site and its location.**

7.5 The site is bounded to the west by residential development at Charters Piece and agricultural land to the north, east and south.

#### Response to Issues and Options Consultation and Site Sustainability Appraisal

7.6 We agree with the conclusion of the Site Sustainability Assessment for this site that new development could be softened in the landscape with sensitive planting and gaps between buildings, retention of the



southern boundary hedge and additional planting.

## 60 - Land east of College Lane, Worlingham

### Susan Doherty

Sites 44/60/62 Over 600 houses in this area is not sustainable, again no infrastructure, loss of habitat for wildlife, far too many houses

### Paul Gurbutt

1. How do you protect the historic heart of Beccles from the increased traffic. All the developments are south of Worlingham and all the supermarkets are to the north (\*) traffic blocking Beccles. The secondary schools locations (\*) that cross Beccles traffic is inevitable. Larkfleet (area 82) gave no assurance of any solution to the traffic problem.
2. How do you plan for extra infrastructure? I have heard from Anglian Water that the sewage treatment works is already over stretched, without 100's more houses.

### andy house

I do not think this site is suitable for a development of this scale as the road access is on minor roads through residential estates. The school already crowds the roads at certain times. There are few local facilities in Worlingham and direct access to those in Beccles is along Lowestoft Road which has several traffic pinch points already - rail crossing, peddars traffic lights and Blyburgate.

If college lane is seen as the main access to Beccles the right turn onto Ellough Road would require upgrading

Any significant increase in population of Worlingham would further stress the healthcare facilities at Beccles Medical Centre and the local dentists which are already difficult to access.

### andy house

this is a good location providing the college lane junction with Ellough road is improved. connecting this area to lowestoft road via garden lane or rectory lane would add too much traffic to the junctions ( limited visiblilty) and cause problems around the school. Half the number of houses being proposed would be more in keeping with the adjoining housing density

### Rachael Staniul

Is a prime example of a rich wildlife habitat – birds, insects, butterflies and mammals. Hedgehogs are in serious decline due to habitat loss, and the removal of hedgerows. Covering this in concrete would be devastating for the wildlife, and would have a knock on effect for the whole area.

Surely brownfield sites must be prioritised, rather than simply concreting over the countryside. We owe it to future generations to preserve such beautiful and diverse habitats, - not lose them forever.

### Historic England (Debbie Mack)



Worlingham Manor grade II to west. Potential impact on setting of Listed Building.

**Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

**Worlingham Neighbourhood Plan Steering Group (John Coulson)**

As a resident of Worlingham my concerns are for the areas listed (82, 62, 60, 44).

Increase in traffic

Will local drainage be able to cope. A recent response to our Neighbourhood Plan group indicates that foul and surface water drainage is already virtually at its limit.

What will WDC do to improve facilities in Worlingham as we currently have no village hall, pub etc.

What will determine the number / rate of housebuilding in Worlingham?

Can you please differentiate between Worlingham and Beccles, they are not the same place!

Will the local plan consider a new doctors surgery in Worlingham.

What is WDC position with the Larkfleet housing proposal. When will you have establish what growth level you will be working with?

How will our neighbourhood plan be able to influence WDC planning?

When do we need to have our neighbourhood plan in place to be considered in WDC planning?

**Worlingham Parish Council (Lesley Beevor)**

It was agreed that the preferred development choice for Worlingham would be the site no. 60, or if not, then no. 44 – as these would be closest to the proposed southern relief road. This was AGREED by a majority with 1 abstain.

**61 - Land east of Copland Way, Worlingham / Ellough / North Cove**

**Beccles Town Council (C Boyne)**

Beccles Town Council would back sites 61, 77 and 78 for future employment bearing in mind the access provision mentioned above and suitable power supplies which are not available at the moment.

[The road infrastructure in the area is very poor and not fit for purpose, the B1127 being a prime example as it



is little more than a country lane, as is Ellough Road and most of the others. There is inadequate pedestrian and cycle access to the existing and proposed employment areas at Ellough and no bus service at all.]

## **BKW Ltd (-)**

### **1. Introduction**

1.1 Waveney District Council is in the early stages of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the plan period to 2036.

1.2 As part of this process the District Council invited land owners to submit details of sites for future employment development and is now inviting comments on the sites submitted to them and questions related to the issues and options facing the district in the future.

1.3 This report responds to the Site Options map and comments made on our client's site no.61. We have also responded to relevant questions from the consultation document and submitted these separately. The responses are included here in Appendix 1 for ease of reference.

1.4 These representations concern the part of the Ellough Industrial Estate edged in red on the inset plan below:

(MAP OF SITE)

1.5 The plans in Appendix 2 identify the site, its location and its surroundings.

1.6 Evolution Town Planning have been instructed by BKW Ltd (owners of a significant part of the Ellough Industrial Estate – the former Ellough airfield) to make representations to this public consultation.

1.7 Evolution Town Planning (ETP) are experienced in promoting employment sites either through development plan representations or planning applications and have particular experience with development on former airfields.

1.8 We also have site assessment experience from working in Council planning departments. As a practice we have 30 years of combined professional experience in this type of work.

1.9 These representations build on the information submitted to the Call for Sites consultation.

1.10 The Waveney Core Strategy's vision for Beccles states that "Beccles Business Park at Ellough will offer additional opportunities for local employment". It goes on to say that "There is demand for more land in the area of Ellough/Beccles Business Park to accommodate the needs of larger users for B1, B2 and B8 use [...] Progress in developing the undeveloped areas of land at Ellough will be an important consideration in determining the need to allocate further land here".

1.11 When this Core Strategy was adopted this site was an 'undeveloped area of land' at Ellough but this is no longer the case. Recent industrial scale planning permissions have opened up the potential of this site to, potentially, the 'larger users' the Core Strategy referred to. Details of these planning permissions is given in the planning history section below.

1.12 The site has been assessed and we consider it remains suitable, available, achievable and viable taking into account relevant policy requirements and obligations.

1.13 We invite the District Council to consider the information in this report and the merits of the site to deliver sustainable employment in Waveney.



## 2.0 Planning Policy

2.1 The Waveney Core Strategy predates the 2012 National Planning Policy Framework (the Framework) and more recent Planning Practice Guidance (PPG) and as such is becoming increasingly out of step with national planning policy imperatives.

2.2 National planning policy, to which the new local plan will need to comply, is provided in paragraphs 18 to 21 of the Framework which state:

Delivering sustainable development

### 1. Building a strong, competitive economy

18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

21. Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

> set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;

> set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

> support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;

> plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;

> identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and

> facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

2.3 Of particular relevance from these paragraphs are the policies requiring that:

> Planning should operate to encourage and not act as an impediment to sustainable growth

> Local planning authorities should plan proactively to meet the development needs of business and support



an economy fit for the 21st century

> Support existing business sector, talking account of whether they are expanding or contracting

> Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances

2.4 The Waveney New Local Plan is at an early stage and it is not yet clear how Waveney District Council will be responding to these national policy imperatives and how this will be reflected in its approach to economic development policy.

2.5 In terms of policy guidance we have had regard to policies of the adopted Core Strategy (2009), the CIL Charging Schedule, Site Allocations (2011) and the Development Management document (2011) .

2.6 The Council acknowledges the need to review these adopted policy documents as part of the new Local Plan as they were based on former national planning policy priorities and predate the Framework and Planning Practice Guidance.

2.7 These local policy documents are adopted and, as the Council acknowledges, form a useful baseline now and we have had regard to them in the same manner.

2.8 The Framework seeks to deliver sustainable development. We consider that the assessment below shows that the further development of this site would meet the social, environmental and economic tests for sustainable development.

### **3.0 The Former Airfield**

#### **History and Geographical Context**

3.1 Ellough Airfield was completed in 1943 and served for a short time as an RAF Bomber Command and RAF Coastal Command airfield during the Second World War. The airfield was decommissioned after the war and the land is now an industrial estate. For a time a heliport operated to service the North Sea oil and gas rigs. A basic airstrip, known as Beccles Airport, remains on the former airfield, and is used as a training centre and private airfield.

3.2 The site is located to the south east of Beccles , within the former Ellough Airfield. It is bordered to the south and west by the B1127 which provides a link between the A12 at Wrentham and the A146 east of Beccles. To the south and east of the site, the land is predominately agricultural comprising a flat, open landscape with a mix of large and medium sized arable fields, scattered small woodlands and some field hedgerows:

(Aerial Photo showing site boundary)

3.3 The Suffolk Coasts and Heath AONB is located 1.5km to the east of the site. There are no residential properties within 1 km of the site. There are no Tree Preservation Orders affecting the site. There are no public footpaths passing through or adjacent to the site.

3.4 A poultry farm is located approximately 400m to the south of the site. This comprises a series of 12 large (80m x 25m) single storey buildings.

3.5 A remnant runway is located to the eastern edge of the proposed site, running in a northwest-southeast direction.

3.6 To the north west of the site, there is a substantial area of mixed commercial/industrial buildings comprising Ellough Industrial Park, Beccles Business Park and Moore Business Park. These include several large scale industrial buildings (up to 150m long and 5-12m tall) which form prominent features in the local



landscape.

#### 4.0 Site Planning History

4.1 The site has the following planning permissions associated with it. Those in bold have been implemented:

> **Discharge of Condition nos 7, 8 and 9 of DC/14/2634/FUL - Engineering operation to construct a digestate storage lagoon, plus operational development of access road and boundary. Land Off Copland Way Worlingham Beccles Ref. No: DC/15/1875/DRC | Received: Fri 08 May 2015 | Validated: Mon 11 May 2015 | Status: Application Permitted**

> **Engineering operation to construct a digestate storage lagoon, plus operational development of access road and boundary fencing. Land Off Copland Way Worlingham Beccles Suffolk NR34 7TL Ref. No: DC/14/2634/FUL | Received: Thu 14 Aug 2014 | Validated: Thu 14 Aug 2014 | Status: Application Permitted**

> **Construction of a compound to house network entry and gas flow metering equipment for adjacent anaerobic digestion plant. Land East Of Copland Way Worlingham Suffolk Ref. No: DC/13/3804/FUL | Received: Fri 20 Dec 2013 | Validated: Thu 30 Jan 2014 | Status: Application Permitted**

> Construction of grain storage and processing buildings including erection of 14no. silos and new vehicular access. Land East Of Copland Way Worlingham Suffolk Ref. No: DC/13/3796/FUL | Received: Fri 20 Dec 2013 | Validated: Tue 24 Dec 2013 | Status: Application Permitted

> **Discharge of Condition nos 7, 8, 9, 11 and 18 of DC/11/0670/FUL - Construction of an anaerobic digestion plant and associated buildings and structures - details of prevention of discharge water entering the highway, details of vehicle turning within the site, archaeological report, land contamination report and details of surface water drainage system. Land East Of Copland Way Worlingham Suffolk. Ref. No: DC/13/0299/DRC | Received: Mon 18 Mar 2013 | Validated: Tue 19 Mar 2013 | Status: Application Permitted**

> Construction of grain storage and processing buildings including the erection of 14no. silos and new vehicular access. Land East Of Copland Way Worlingham Suffolk. Ref. No: DC/12/1475/FUL | Received: Wed 12 Dec 2012 | Validated: Mon 17 Dec 2012 | Status: Application Permitted

> **Continuation of existing planning permission DC/07/1288/FUL for open storage. Old Runway East Of Copland Way Worlingham Suffolk. Ref. No: DC/11/1326/FUL | Received: Wed 23 Nov 2011 | Validated: Wed 23 Nov 2011 | Status: Temporary Permission Granted**

> **Construction of an anaerobic digestion plant and associated buildings and structures. Land At Former Ellough Airfield Copland Way Worlingham Suffolk. Ref. No: DC/11/0670/FUL | Received: Sat 11 Jun 2011 | Validated: Thu 30 Jun 2011 | Status: Application Permitted**

> **Provision of open storage for minerals. Old Runway East Of Copland Way Worlingham Beccles Suffolk. Ref. No: DC/07/1288/FUL | Received: Wed 04 Jul 2007 | Validated: Mon 09 Jul 2007 | Status: Temporary Permission Granted**

> **Provision of open storage for minerals. Old Runway East Of Copland Way Worlingham Beccles Suffolk. Ref. No: DC/06/1400/FUL | Received: Fri 08 Dec 2006 | Validated: Fri 08 Dec 2006 | Status: Temporary Permission Granted**

> **Construction of link road and associated landscaping. Land Between Lowestoft Road (A146) And Benacre Road (B1127) Ellough. Ref. No: DC/88/1195/FUL | Received: Mon 05 Dec 1988 | Validated: Mon 05 Dec 1988 | Status: Application Permitted**

> **O/A Industrial development & construction of Ellough link road. Land Between Lowestoft Road (A146) &**



**Benacre Road (B1127) Ellough (East Of Ellough Industrial Estate). Ref. No: DC/87/1601/OUT | Received: Mon 14 Dec 1987 | Validated: Mon 14 Dec 1987 | Status: Application Permitted**

4.2 The recent planning history in particular demonstrates that the principle of development is now established on this site.

4.3 The scale and complexity of these developments and the principle they establish in terms of appropriateness of location for emissions, traffic, scale, bulk and height etc. lends them to be accompanied, or in time replaced, by other complimentary employment, commercial and industrial uses.

## **5.0 Site Option 61 Land East of Copland Way**

### **Site Description and Development Potential**

5.1 The site is located in the centre of the former Ellough Airfield, to the east of Copland Way. A plan of the site is included in Appendix 2.

5.2 The site is 16.3ha in size and is well related to the wider industrial estate and local transport network. The site has a significant frontage onto Copland Way and the B1127.

5.3 The site includes a consented anaerobic digestion plant which has seen subsequent planning permissions for a storage lagoon and National Grid connection compound. Construction is well underway on the anaerobic digestion plant and is nearing completion on all elements.

5.4 There is also an extant planning permission for a large scale commercial grain store and a temporary planning permission for aggregate storage on the former runway to the east.

5.5 The areas of these planning permissions total some 6.7ha. There is therefore 9.6ha remaining undeveloped currently. This is shown on the inset plan below. As can be seen it consists of the former runway to the east and an area in the south of the site:

(Map showing site boundary, currently available land, AD plant, grain store and CWS).

5.6 The site is bounded to the west by commercial and industrial development, the east by the former runway, the southeast by the RainAir airstrip, the south by the B1127 and the poultry farm further south. Beyond that is the crematorium and consented major solar farm.

5.7 The recent planning consents on this site demonstrate its development potential.

### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

5.8 The Site Sustainability Assessment (SSA) at Point 12 states that “development could result in the loss of a County Wildlife Site”. This was not the intention of the plan submitted at the call for sites stage. For the avoidance of doubt we have provided an amended version of the plan E422/BKW1 with this report which excludes the County Wildlife Site. The site should not score 0 (neutral) against this criteria.

## **6.0 Conclusion**

6.1 This report promotes a site at the Ellough Industrial Estate for employment use in response to the new Local Plan Issues and Options consultation.

6.2 The former airfield has seen its commercial and industrial offer increase over time and additional land is required, especially for larger users, according to the Core Strategy.

6.3 This site already includes planning permissions for large scale industrial development. Therefore the development potential of this land is open to further exploitation and this may put it ahead of other sites



nearby which remain empty.

6.4 We have reviewed national and local planning policy and guidance and have visited the site and toured the area on many occasions. We have considered the site against the criteria set out in the Strategic Housing and Economic Land Availability Assessment consultation methodology (Oct 2015).

6.5 Our site assessment shows that the site remains suitable, available and (subject to addressing utilities capacity issues locally) it is achievable.

6.6 An allocation for development would therefore meet the economic, social and environmental principle of sustainable development.

### **Suffolk Wildlife Trust (James Meyer)**

Site 61 includes Ellough Airfield CWS. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the CWS.

## **62 - Land east of Ellough Road, Worlingham**

### **Susan Doherty**

Sites 44/60/62 Over 600 houses in this area is not sustainable, again no infrastructure, loss of habitat for wildlife, far too many houses

### **Paul Gurbutt**

1. How do you protect the historic heart of Beccles from the increased traffic. All the developments are south of Worlingham and all the supermarkets are to the north (\*) traffic blocking Beccles. The secondary schools locations (\*) that cross Beccles traffic is inevitable. Larkfleet (area 82) gave no assurance of any solution to the traffic problem.

2. How do you plan for extra infrastructure? I have heard from Anglian Water that the sewage treatment works is already over stretched, without 100's more houses.

### **andy house**

This is a good site for development as it already has road, cycle and footpath links. The number of houses is too big - perhaps half the site could be for housing and the remainder for commercial ( car home, sheltered housing village or sports amenity

### **Jay**

### **Traffic**

Ellough road is currently very busy at peak times – this will only get worse with 360+ cars added at these times. As there are two schools located on, or just off, this road this could become quite dangerous at peak hours.

### **Local Facilities**



Schools, Doctors and Dentists would have to be able to cope with approx 1,000+ extra people. As these facilities are all currently stretched, can they cope with this increase and are finances available for this extra demand.

### **Flooding/Water**

Once housing is built any excess water will run onto properties in Cedar Drive or downhill along Ellough Road will be likely to pool at the junction with Hillside avenue and increase the chance of flooding to the properties there.

### **Robert Sharman**

Living next to the site I am obviously interested in what is proposed and welcome regular updates. My comments are made as a result of living here and my observations whilst doing so.

The site is bordered by industrial areas including a recycling facility, these produce noticeable noise and smell at times and can operate 24hours. I believe that developing any closer to these industrial areas is not to be recommended as a this would not be a pleasant environment to live in.

The development would increase the traffic in Beccles further which is already regularly gridlocked at peak times.

Employment opportunities are limited by geography and the development will need to attract non- locals and the retired., this will not necessarily increase the prosperity of the town and health services will struggle to cope with the influx.

Having lived in the immediate area since 1972 I've experienced many changes, Beccles thrives as it has balance in housing, jobs and services and this balance has evolved gradually, I believe that to significantly increase just one of these elements, housing, will have detrimental effect on the quality of life within the area.

### **Rachael Staniul**

Is a prime example of a rich wildlife habitat – birds, insects, butterflies and mammals. Hedgehogs are in serious decline due to habitat loss, and the removal of hedgerows. Covering this in concrete would be devastating for the wildlife, and would have a knock on effect for the whole area.

Surely brownfield sites must be prioritised, rather than simply concreting over the countryside. We owe it to future generations to preserve such beautiful and diverse habitats, - not lose them forever.

### **Historic England (Debbie Mack)**

Worlingham Manor grade II to north east. Potential impact on setting of Listed Building.

### **Personal (Jonathan Blankley)**

Development of this land removes another area of green space and the break between the existing residential area and the industrial estate. It will also add to the pressure of traffic going into town via Ellough Road and Ingate. It will also add to the number of trips to the High School, thus making an already busy route even worse. The access would need to be off Ellough Road which is fairly narrow, and not all walker or cyclist



friendly. Or off College Lane, which leads on to Ellough Road.

Were it to be developed, then it would need to add to the existing community, by creating an area of green space between it and the existing properties, and including assets of benefit to the local community such as additional leisure facilities, and consideration of a pub/restaurant, something that Worlingham lacks.

**Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

**Worlingham Neighbourhood Plan Steering Group (John Coulson)**

As a resident of Worlingham my concerns are for the areas listed (82, 62, 60, 44).

Increase in traffic

Will local drainage be able to cope. A recent response to our Neighbourhood Plan group indicates that foul and surface water drainage is already virtually at its limit.

What will WDC do to improve facilities in Worlingham as we currently have no village hall, pub etc.

What will determine the number / rate of housebuilding in Worlingham?

Can you please differentiate between Worlingham and Beccles, they are not the same place!

Will the local plan consider a new doctors surgery in Worlingham.

What is WDC position with the Larkfleet housing proposal. When will you have establish what growth level you will be working with?

How will our neighbourhood plan be able to influence WDC planning?

When do we need to have our neighbourhood plan in place to be considered in WDC planning?

**63 - Land east of Flixton Road, Blundeston**

**Mr Stephen Brown**

I was not informed of these plans by post unlike my neighbours, so I'm some what surprised that maybe you feel it not necessary to inform me? That aside I then have to question what on earth the thoughts are around these proposals as currently they make no sense apart from thinking there's a lot of very rich land owners wanting to make even more money without considering the village status of Blundeston and its history, that's the emotional side of my email over its now to the facts.

The proposals, and with interest the 242 house site will introduce a huge increase of noise, from its construction to its end result with circa 1000 additional people and 500 cars all entering and exiting the



proposed "estate" spoiling the lovely countryside that I have worked so hard for to be living near and so hard for in maintaining it, the thought of the amount of houses here and around Blundeston sickens me. I have lived in the parish now with my family for over 20 years and I know that there needs to be development but this is ludicrous beyond compare.

**simon bunting**

Area of outstanding beauty ,we were prevented from walking dogs all around this field as the owner was trying to regenerate natural habitat for wildlife ,seemingly his opinion on that has changed

The village lacks the infrastructure to accommodate the amount of new housing proposed in the plans , School overcrowded and little room to expand ,church rd is already a gridlock during term time how will the increase in traffic be accommodated ,.

no doctor or dental surgery local to treat people no local shops

enough housing has been built in the village to drastically change its character this excessive increase will simply cause the village to become part of lowestoft and in future will lowestoft and Yarmouth be joining .

I oppose the size of the proposed plans in the strongest terms .The lack of information about this plan is shocking i was informed via a friends Facebook post but have received no written notification of this .when i applied for permission to build an extension the planning officer advised not to apply for an extension at the front as i wanted as it may not be in keeping with the character of the village ,there won't be any character left if an extra 200 plus houses are built

**Mr Peter Carrier**

Holy unsuitable sites for such massive builds, there is inadequate infrastructure (sewage, utilities and roads) such a project would ruin the outlying area, in addition This would take away good agricultural land growing food, a consideration for lowering the imports and potential local economy issues with the EU.

**Elizabeth Fulwood**

Following receipt of a copy of the proposed new housing sites in Blundeston, I write to express my concerns over 2 sites in particular, Site 63, suggested for 242 houses and Site 42 suggested for 127 houses.

Whilst smaller developments of 5 or 10 houses can almost be built unnoticed, much larger developments such as those suggested for Sites 63 and 42 would, I feel, destroy the beauty, the peacefulness and charm of the village which are the very reasons I moved into Blundeston over 25 years ago. The open spaces and views I have enjoyed in the village for many years would be lost and traffic and noise would increase.

Whilst I understand that not all sites will be needed and not all the proposed number of houses on those sites will be built, I am concerned that should the larger sites go ahead, the Blundeston I know and love today will be lost.

I do not object to new houses being built in Blundeston but I do object to such large developments.

**Raymond Gaitero**

Hi, surely this is not a serious plan to build 242 houses on this site .I cannot see on this plan where the development of the former Blundeston prison is listed .Surely this has to be taken into consideration before



any further planning is agreed in Blundeston .

The development of the Prison site will surely put pressure on an already over developed Blundeston .

There are no shops , no bus service, no industry other than farming/building and I`m sure the Primary school will not be able to take anymore schoolchildren , let alone the infrastructure .

Looking at other plans submitted for Blundeston I cannot believe the farmers want to sell their land ! surely we need good farmland to sustain our ever growing population .

I and many others in my village are totally against these developments.

Regards

### **Terry Gooding**

Blundeston cannot support a development of this size, there simply isn't the infrastructure to justify it. Destruction of greenfield sites, over subscription of essential services such as schools and doctors, the fact that roads will become busier and more dangerous as a result. Increased risks of flooding due to concrete coverage.

As a wider concern I do not see plans for new hospitals, fire stations, police stations, doctors, school or public transport

Why is the redevelopment of the prison site not included here which in itself will contain at least 100 houses - will this offset your need to build all over Blundeston & ruin yet another beautiful village. People live here to escape the sprawl not live on a housing estate.

I appreciate that housing is required but not on this scale and any planning application of this nature will be opposed by all who live there.

### **andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

Too many cars in the village already. No where for them to park off road.

Traffic generated by a development of this size would be significant. The village structure cannot support development of this scale.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.



### **M and G Miller**

We feel very concerned about the possible future building plans for Blundeston, particular to us would be site 63 which we have no wish to see become another Carlton Colville together with all the other sites.

Blundeston is a beautiful historic village which already struggles with school traffic, our estate becomes a glorified car park on school days my daughter has difficulty in leaving our house to collect children from other schools, so cannot imagine how Blundeston school could be enlarged. People in the village have trouble with flooding as the drains can't cope.

The prison site will be developed in some way so we hope after that BLundeston will be left in peace.

### **John Mitchell**

Site 63 for 242 appears to be gross overdevelopment and inappropriate to the scale and needs of the village. Housing on this scale would create problems for school provision, Flixton Road is not suitable for this increased traffic, and the development would set a dangerous precedent for further invasions on the countryside.

### **Bruce Rayner**

Regarding the map of potential land for development in Blundeston

Site 63 - 242 homes

Generally:

1. The plan indicates that housing demand may exceed supply and that there may be a requirement for a further 8,000 homes before 2036. Before large areas of the locality are built upon, are the Council certain of the requirement? It would seem irresponsible to build numerous 'white elephants'. Is this not merely a function of the Government's policy to build a specified number of homes but without certainty of need in this area?

2. The plan indicates that there are already 3,141 new homes in the pipeline, plus a further 633 anticipated. That would seem to be enough for the present until precise requirements are known.

Specifically to Blundeston:

a) Most of the employment in the plan would appear to be within the area South of the river. It would therefore make sense to concentrate on housing in that area i.e. in the vicinity of the Carlton Colville areas.

b) Transportation in Blundeston is poor with bad road access, many of which are dangerous even with low traffic conditions. A number of the specified sites (164-165) are far better served for roads and also do not impinge upon the existing properties.

c) A number of the Blundeston sites do not benefit from obvious safe and easy access. For example, number 63 is served by a road which is on a bend and is dangerous enough at the best of times.

d) Surely it would be better to keep this area rural from a tourism point of view. This is an area used by local runners, cyclists, etc. and further traffic would damage that amenity for ever, together with attractions such as Somerleyton and Fritton, an idyllic serene area very much enjoyed by tourists.

e) I am not entirely sure of the numbers set against the sites. The densities do not seem to make sense. For example, site 164 is 18.7 ha and is allocated 270 homes. Presumably there are reasons for this. At 30 homes



per ha (considered normal), nearly 500 homes could be allocated on this far more appropriate site. As a Chartered Surveyor, with experience in property development, your figures do not appear to be accurate.

f) Blundeston is a tiny village with no real services (no shop etc.) and only a primary school. The nearest secondary school is Benjamin Britten, ideally placed for sites 164-165.

g) Blundeston is not served by a regular bus service at all (3 times per day, less so at weekends) so any new residents would be forced to use yet more cars. Surely an environmental issue. There are no allocated safe cycle routes, whereas the areas to the North and South of Lowestoft are well served with cycle routes already. If public transport were to be improved, this would create a hazard in itself because buses on the tiny country roads serving Blundeston are a major hazard.

h) Blundeston is primarily a village of older and mature properties. New homes next to other new homes in Carlton Colville would make far more sense, instead of 'blots' on the landscape.

i) By publishing this document, you seem to have added planning blight to nearly all of the homes surrounding Lowestoft for no apparent reason.

j) Building 456 new homes in Blundeston would almost double the population of the village (1,637): surely not desirable, sensible or necessary.

k) Currently essential services / supply (water / sewerage / gas, etc.) are limited. At certain times of the day, water pressure is already very low.

l) The risk of flooding through rainfall would increase in the village if soak up becomes diminished with the presence of a concrete jungle.

m) Broadband is slow within the village and mobile phone signals are significantly impaired.

n) There would be demolition costs associated with site no. 63.

o) The development planned for the prison site is already enough for the village to cope with.

p) Blundeston is inhabited by lots of wildlife - there are owls, newts, hedgehogs, etc. I've heard baby owls calling to their parents from our house. Some of these species are becoming rare. Why destroy these areas when there are alternatives?

q) My partner and I moved to Blundeston because we wanted to live in a quiet rural area and we wanted a view across a field. We are absolutely devastated to think that this fabulous area could be spoilt by the apparent unsubstantiated need for such housing. If it happens, we will be moving.

#### Conclusion

It makes far more sense to build on the sites identified at Carlton Colville. The proper infrastructure could be put in place on one area (roads, mains services, shops, schools, GP practice, etc.) It is South of Lowestoft which is where the jobs are supposed to be. Why spoil beautiful landscapes, upset huge numbers of the local population and potentially decrease tourism and enjoyment of the areas outlined?

#### Gary Shilling

As outlined in my local village news letter (Blundeston) I would like to register my rejection to any large scale building (sites 29, 42, 63 & 129), in my opinion the village neither has or has the ability to enable a construction on these scales. We have neither the roads to handle the increased traffic ( roads not in a good state of repair or wide enough, concerns for children around the village as no road has a cycle lane or footpath), the school could not accommodate an increase, no local facilities and simply no need. It is nice to



remain a village and not end up becoming part of oil ton broad as outlined village has done! I have no objection to small (under 10) development that allow the village to absorb the impact that it would have. I understand this is a biased view, but like everybody whom lives here, we picked it because it is a small village. This is mind with the development on the old prison site and other sites (that have been constructed and are just footings in the ground) the usual infill sites have been enough. The development on the prison will increase the traffic in and out of the village hugely as most households have two cars if not more, and that with children staying at home for longer traffic will increase without further building. T can already be seen throughout Lowestoft, Blundeston aside people are increasing parking on the road instead of using garages of changing front gardens to off road parking which should be implemented to remove cars parked on roads to increase road safety. Sorry didn't mean to turn into a rant.

### **Gary Shilling**

Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians),

### **Carl Wright**

I came by this information via my neighbour as you have not informed me directly which I find quite amazing!

That aside I then have to question what on earth the thoughts are around these proposals, as currently they make no sense apart from increasing the wealth of the local land owner. This proposal cannot possibly have been made with consideration to the village status of Blundeston, its community and its history.

The proposed building of the 242 house site adjacent our house will introduce a huge increase of noise from its construction to its end result, with circa 1000 additional people and 500 cars all entering and exiting the proposed "estate" spoiling the lovely countryside that I have worked so hard to be living near and so hard for in maintaining, the thought of the amount of houses here and around Blundeston sickens me.

We moved here 5 years ago to be in a rural village surrounded by fields and although I appreciate that there needs to be new development, I find this solution to be ludicrous beyond compare. The local school is already full, the parking along Church Road already needs a serious look at before someone is seriously hurt, the parking in general on the roads of Blundeston is getting worse and no improvement has been forthcoming, but yet you are considering bringing in a further 4000 people along with their visitors and cars, very thoughtless. The infrastructure and road network is not sufficient by any means to safely cope with such plans and should such plans go-ahead we will leave a suburban legacy for our children and with it we will see an increase in crime, pollution, noise, cars, people and accidents.

In conclusion, I am vehemently opposed to your plans, my house will dramatically drop in value, and very insulted that you never even bothered to contact me, I had to hear it from my neighbour!

I would appreciate the chance to be consulted on a proposal that will have such a dramatically negative impact on the life of me and my family and hope that the local population will be properly informed of how we can oppose such a damaging scheme to our village.

### **Historic England (Debbie Mack)**

Proximity to Church of St Mary grade I and Somerleyton Park Historic Park and Garden. Potential impact upon setting of High Grade Listed Building and the Park and its setting.

### **N/A (Tim caley)**



This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are constantly clogged with school traffic.

#### **N/A (NEIL CASE)**

REDEVELOPMENT OF BLUNDESTON PRISON SITE MORE THAN FULFILLS ANY NEED FOR FURTHER DEVELOPMENT IN THE VILLAGE. THIS ALSO APPLIES TO SITES 49, 29, 42, 129, 20, & 27 THIS IS A SMALL VILLAGE WITH LIMITED INFRASTRUCTURE, & FACILITIES FOR FURTHER DEVELOPMENT SMALL OR LARGE.

#### **n/a (Alan Yardy)**

1. The site in question is of high quality, productive arable land and any development would represent a significant loss. New developments should be situated on low quality land.
2. The frontage of the site is situated on the un-classified Flixton Road, a narrow road with a series of bends and junctions. This road is totally unsuitable for the volume of traffic resulting from the development envisaged or the traffic involved in the construction phase.
3. The proposed development would present significant problems regarding capacity in the village school.

#### **None (Stuart Precious)**

As a resident of this village I am very concerned that a development of this size which is frankly un-necessary, would irreparably alter the character and dynamics of the village. The infrastructure required does not exist. We don't even have an effective bus service.

#### **Not a business (David Preston)**

I feel that this is too many extra houses as it will change the character of the village.

I am also concerned that the infrastructure, particularly drainage, would be a problem as it seems to be under constant strain as it is.

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:  
63 Land east of Flixton Road  
We do not consider this site suitable for development due to poor access and egress road infrastructure.

#### **Somerleyton Estate (Lord Somerleyton)**



## 1.0 Introduction

1.1 Waveney District Council is responsible for setting the amount of housing and employment land is required in Waveney in the future. They are in the early stages of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the period up to 2036.

1.2 Evolution Town Planning have been instructed by the Somerleyton Estate to make representations to this public consultation. This is an early stage in the process whereby the Council allocates sites for housing and employment development.

1.3 This report includes commentary on the Site Option 63 in Blundeston. Our responses to the consultation Questions have been submitted under separate cover on the District Council's proforma and a copy is provided here in Appendix 1.

1.4 Evolution Town Planning (ETP) are experienced in promoting rural sites either through development plan representations or planning applications. We also have site assessment experience from working in Council planning departments. As a practice we have 30 years of combined professional experience in this type of work.

1.5 These representations include a potential housing site in in Blundeston. The site is east of Flixton Road and north of the primary school. The site is large and it is not necessarily the case that if selected for development the District Council would wish to see it developed in its entirety. We present the site in its entirety at this stage for the District Council's consideration .

1.6 This site has been assessed and we consider it to remain suitable, available, achievable and viable taking into account relevant policy requirements and obligations.

1.7 The identification of this site results from a village-wide walk over and assessment of the development potential. The plan in Appendix 2 identifies the site, its location in the village and its surroundings.

1.8 According to evidence in the Waveney Village Profiles and from our tour of the village Blundeston benefits from a number of local facilities and services which contribute to its sustainability.

1.9 The Somerleyton Estate is open to the tenure and mix of housing which could be delivered on this site. Much depends on the final site selection and local needs but could include bungalows, affordable housing and smaller homes for first time buyers. These are all issues identified as important to the community in the 2005 Village Plan.

1.10 It remains unclear how the District Council will be responding to recent Government guidance on boosting housing supply and recognising the benefits of rural housing. Therefore the recognition of the village's sustainability credentials is something we will be pursuing through the local plan review.

1.11 In the meantime we invite the District Council to consider the information in this report, the merits of the site to enable the village of Blundeston it to 'play its role in delivering sustainable development'<sup>1</sup> in Waveney.

## 2.0 Planning Policy

2.1 The Waveney Core Strategy dated 2009 was an early respondent to the 2004 Planning Act in respect of the adoption of the Local Development Framework in comparison to other Council's in Suffolk.

2.2 In the 2009 Waveney Core Strategy Blundeston was classified as a 'Larger Village' and with other villages was earmarked for accommodating 5% of the district's housing needs.

2.3 The Core Strategy anticipated that much of the housing growth in Blundeston would occur on brownfield sites and from our tour of the village we saw that the former garage site, the former Methodist Church and



other small brownfield sites had already been developed.

2.4 The Core Strategy anticipated that some development may be needed on greenfield sites on the edge of the village. With many of the principle brownfield sites in the village now developed attention may turn towards the greenfield sites to deliver housing growth over this next plan period.

2.5 The Waveney Core Strategy predates the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG) and is becoming increasingly out of step with national planning policy imperatives and recent Government requirements for local plans to be in place by early 2017. For example the Framework requires local planning authorities “ to boost significantly the supply of housing”.

2.6 The PPG provides guidance on rural housing and states (our emphasis in bold):

Rural Housing How should local authorities support sustainable rural communities? Paragraph: 001 Reference ID: 50-001-20140306 It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements . This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.

The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

2.7 The Waveney New Local Plan is at an early stage and it is not yet clear how Waveney District Council will be responding to these national policy imperatives and how this will be reflected in revisions to the settlement hierarchy in the spatial strategy.

2.8 It is not known whether the District Council will refresh their settlement hierarchy and again direct a proportionate amount of housing to the ‘larger villages’ or whether they will abandon the ‘blanket approach’ of settlement boundaries and allow development where it can be shown to be sustainable and well related to the built form. Much will depend on the responses the Council receives to the Issues and Options consultation.

2.9 In terms of policy guidance on the site assessments below we have had regard to policies of the adopted Core Strategy (2009) , the CIL Charging Schedule and the Development Management document (2011); specifically policies DM01 Physical Limits, DM16 Housing Density, DM17 Housing Type and Mix and DM18 Affordable Housing.

2.10 The Council acknowledges the need to review these policies as part of the new Local Plan as they were based on former national planning policy priorities and predate the Framework and Planning Practice Guidance. 2.11 These local policy documents are adopted and, as the Council acknowledges, form a useful baseline now and we have had regard to them in the same manner.

2.12 The National Planning Policy Framework (The Framework) seeks to deliver sustainable development. We consider that the assessment below shows that the residential development of the site we have submitted will meet the social, environmental and economic tests for sustainable development.



### **3.0 The Village of Blundeston**

#### **Geography**

3.1 Blundeston is located in the north of Waveney District and is 4 miles from the centre of Lowestoft. Blundeston is 2.5 miles from the village of Somerleyton with its Post Office and Rail Station both of which Blundeston does not have.

3.2 Blundeston has a population of 1637 people and 509 dwellings<sup>2</sup>. The demographic displays an imbalanced gender distribution with 40% more male residents than female. The average age matches the average for Suffolk and the East of England<sup>3</sup>.

#### **Key Facilities**

3.3 The Waveney District Council Village Profile (Appendix 3) for Blundeston lists the key facilities which contribute to the sustainability of the village.

3.4 The key facilities in Blundeston include a food shop, public house, meeting place and a primary school. There is also a church, football pitch, bowling green tennis and netball court, millennium park, playground and post box.

3.5 The nearby villages of Somerleyton and Lound have additional key facilities accessible to Blundeston including a rail station, post office, food shop and a primary school, contributing to its sustainability.

### **4.0 Site Option 63 Land East of Flixton Road, Blundeston**

#### **Site Description and Development Potential**

4.1 The site is located in the west of the village and is immediately adjacent to the primary school. A plan of the site is included in Appendix 2 along with the Council's completed Call for Sites proforma.

4.2 The site is 12ha in size and is well related to the built form of the village. It is important that the Parish Council and residents are clear that it is unlikely that the District Council would seek to allocate the entire site. Submitting the entire site at this early stage allows for future refinement depending on the District Council's needs for Blundeston.

4.3 While Policy DM16 indicates a density of 30 dwellings per hectare (dph) is appropriate as set out above it is unlikely the whole 12ha would be developed. The density of development on this site will to a degree be dictated by the character of nearby development.

4.4 Existing local planning policy requires 35% of the dwellings which this site, or part of it, could deliver to be affordable. The lack of affordable housing was a significant issue expressed in the 2005 Village Plan.

4.5 The site is a regular square shape and is generally flat and with a slight slope to the west to Flixton Road.

4.6 To the north of the site is Holly Gardens Nursery. To the west is agricultural land. To the east is agricultural land and beyond that residential properties fronting The Street. To the south of the site is the primary school and residential development fronting Church Road and in Dickens Court.

4.7 The site is approximately 7 minutes walking time via pavements to many of the village facilities.

4.8 The site has a significant frontage onto Flixton Road with good visibility in each direction and footpath access to Church Road and an existing access.

4.9 Visibility from the existing field entrance to the left extends 100m to the junction with the B1074. To the



right visibility currently extends some 100m

## 5.0 Conclusion

5.1 This report promotes a site in Blundeston in response to the new Local Plan Issues and Options consultation.

5.2 Blundeston is a larger village in the Waveney settlement hierarchy and serves and in turn is served by a number of nearby villages that benefit from a range of facilities where development in one can support services and facilities in another.

5.3 There is a pressing need to deliver a significant boost in housing supply nationally and Planning Practice Guidance makes it clear that rural areas can play their part.

5.4 We have reviewed national and local planning policy and guidance and have visited the site and toured the area. We have submitted this site because it meets the consultation threshold and the criteria set out in the Strategic Housing and Economic Land Availability Assessment consultation methodology (Oct 2015).

5.5 Our site assessment shows that the site remains suitable, available and achievable and that an allocation for development would meet the economic, social and environmental principle of sustainable development in Waveney.

5.6 The site has the ability to provide for a mix of housing types to meet the needs set out in the Waveney Housing Market Assessment and evidenced local need.

Site Map and Blundeston Village Profile attached.

### Suffolk County Council (James Cutting)

The large sites around Blundeston (63, 42, 129) are not currently desirable as there are limited amenities and services within reasonable distance to promote sustainable travel patterns and some of the road network might not be of sufficient standard or capacity. If this scale of development, including growth beyond the village and the proposed redevelopment of the prison, is to be brought forward, a comprehensive review of transport issues will need to be undertaken which may include opportunities for further enhancement of transport infrastructure and services.

## 64 - Land east of Woodfield Close, Willingham

### Sotterley Estate (-)

#### Site Description and Development Potential

8.1 Site Option 64 is located east of Woodfield Close in Willingham. A plan of the site is included in Appendix 7.

8.2 The site is 0.58ha in size and is well related to the built form of the village. It is rectangular in shape and has a flat topography.

8.3 The site is in agricultural use and has recently been used as a horse's paddock.

8.4 According to Policy DM16 a density of 30dph would indicate a minimum of 17 dwellings on this part of the site.



**8.5 More appropriately and reflecting the density of surrounding development, Woodfield Close in particular, this site could provide for around 10 dwellings (including 3 affordable homes) arranged in a manner sympathetic to the site and its location. Development would probably take a similarly linear form to Woodfield Close.**

8.6 The site benefits from two existing vehicular access; one via Woodfield Close and a field entrance off Sotterley Road. The field access could be repositioned onto the frontage with Sotterley Road where it would have good visibility onto London Road.

8.7 The site is bounded to the north and west by residential development, to the south by agricultural land and to the east by plantation woodland.

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

8.8 We agree with the conclusion of the Site Sustainability Assessment (SSA) for this site that retention of trees, hedgerow and the pond would mitigate harm to biodiversity.

8.9 Point 11 in the SSA states that development would lead to the loss of agricultural land. The site has bene out of active agricultural use for at least a couple of decades and is too small and enclosed for modern agricultural equipment. The score against this criteria can be increased from – to 0 (neutral) to reflect circumstances.

### **65 - Land north and east of Hill Farm Road, Halesworth**

**Louis Baum**

[Saved in Chapel House as Objections to Waveney Development Plan 01 06 16]

Having only by chance come across the Waveney District Council's information re a consultation process for new developments between Halesworth and Holton, it is most surprising to us that this information was not circulated in Loam Pit Lane, which is surrounded by potential development plots, especially in the upper, northern end. This failure of consultation should on its own invalidate any proposals WDC might consider for development of this land for housing.

Further, considering WDC's own intentions to keep "strategic gaps" and "prevent coalescence and retain separate identities between Halesworth and Holton", and the assertion that "developments will not be permitted where it would prejudice the aims of maintaining the open character of strategic gaps and open breaks as identified on the proposal map", these locations, in particular 65, seem to be explicitly ruled out for further development. Why, therefore, are they up for discussion?

Even if this were not the case, problems of access and provision of services to these locations make them less desirable areas for development by comparison with other open spaces in the area northwest of Halesworth.

For these reasons we believe that WDC and Halesworth Town Council should explicitly rule out these locations as sites for future housing development.

**Mark Bird**

I am writing to lodge my objection to the proposal of the land north and east of Hill farm road Halesworth to be considered for development, my objections are as follows, firstly I believe that the proposed area is a green



belt area and separates Halesworth from Holton and I think this should remain so. Secondly the fields are constantly water logged during the autumn and winter months and this will only become worse and cause flooding to the properties along the Holton road if it is developed and the water has nowhere to run off to.

The Hill farm road estate could not cope with extra traffic during construction so the increase in traffic once the development was fully occupied it would be impossible to cope with the volume of traffic from 150 houses.

Having lived adjacent to the fields for the past 25 years I have been privileged to witness an abundance of wildlife living and feeding from the area, including barn owls and brown owls, any development would destroy this habitat.

There are other more favourable sites within the Halesworth area that should be considered for development that are not on green belt land, however although I am in favour of seeing the town develop and progress I feel that Halesworth is desparately short of a supporting infrastructure, this includes lack of sufficient schools to support additional children, a Drs surgery that is extremely busy and getting an appointment is difficult, and I am sure that the water works and sewerage plant would be in need of expansion.

Halesworth is a countryside town so expansion should be considered with caution and include development of the town centre and shopping area, other amenities should include upgrading sports areas and leisure facilities.

#### **Martin Briggs**

This development would destroy the breeding habit of protected species; turn Hill Farm Road into a noisy and potentially dangerous rat run; interfere with drainage and water run-off in a way which, despite umpteen surveys and studies, cannot be safely predicted; erode the independence of Holton as a community; and make Halesworth itself a more anonymous and, perhaps, a slightly less desirable place to live.

Despite continual parrotings from Westminster of determination to build so many hundreds of thousands of new homes within such and such a time, I cannot be convinced that there is a demand in Halesworth for this gratuitous development. I assume the proposal is based not on social need but on developers' desire to turn every available square inch of green space into commercial profit. If Waveney District Council actually care about the quality of life of those whom they purport to serve, and about the natural environment and habitats within their jurisdiction, they will throw out this proposal for good. If they should approve it, however, I trust that they will not, in the next breath, bemoan the public's lack of engagement in politics or its lack of faith in politicians.

#### **Martin Briggs**

This land is breeding habitat for the skylark, which is endangered and fully protected under the Wildlife and Countryside Act 1981. I am therefore totally opposed to this application for environmental and moral reasons.

#### **Gary Brown**

The area at present already appears to be at full stretch with doctors appointments at an average of three weeks, schools at bursting point and sewage and traffic appearing unable to cope with present occupants. The bottom line is, the town is too small for this amount of properties.



**Campbell**

More detailed information on the proposed road infrastructure required.

**Richard chambers**

We feel that it would be a great shame to lose this large area green belt land included in this proposal, the impact on the local wildlife would be devastating. Also it would fully join Holton to Halesworth which would be detrimental to the identity of Holton as a separate village.

**James Chambers**

No1 why are you considering building on green site land.

No2 where are approximately 200 hundred cars going to gain access to this site.

No3 from my past experience two of the fields that run along side Holton Road flood.

**Paul Cope**

Other sites - 65, 161, 153 etc would build within Halesworth.

**Jose De Oliveira**

Dear Sir/Madam

We are gravely concerned about plans to build on the fields north and east of Hill Farm Road. We know of at least two natural springs in the area, and the fields serve as a natural way to soak up excess water; so any building on that land would seriously affect this functionality and would therefore potentially have a detrimental effect on homes in and around the area. We are also concerned about building on greenfield sites such as this one, which we have seen supports wildlife (deer, small mammals, barn owls, etc.), when there are other brownfield sites within the Halesworth area that would be suitable for development and should take precedence. Area 65 also forms a buffer zone between Halesworth and Holton, and should therefore be kept in its current state to maintain the integrity of each of these areas. Finally, traffic is a serious concern, should building take place, given the single access point via Hill Farm road to the proposed area. We therefore are deeply concerned and strongly oppose the development of Area 65.

Kind Regards

Dr J.A.A. De Oliveira and Ms E.T. Wise

**Martin Drew**

Objection to planning application, poor drainage and springs, local wildlife such as barn owls, deer, woodpeckers etc. Inadequate access to the site.

**Louise Goddard**



I feel that it not justified in putting houses where there is a cemetery I know that putting them thete will cause alot of upset to alot of people especially those who have loved ones at the cemetery

**Linda Gray**

This land is particularly high and if built in would overshadow all the properties surrounding it. There would also be a blot across the whole of Halesorts as any development would be visible from almost everywhere

**Susan Herrmann**

The land to the north and east of Hill Farm Road forms a break between Halesworth and Holton any development here will link them together meaning there is no demarcation line between town and village. Not sure where the access will be but Hill Farm Road is already congested with cars parked on the roadway especially where it starts to narrow and feel that it would not be able to take the volume of traffic extra housing would create, plus children walking to the play area at the top of Hill Farm Road will be at risk with increase in traffic. I therefore feel that this area is not suitable for further housing. Also where will the extra surface water go as houses in the low on Holton Road tend to flood.

**Mick Highnam**

My concerns are as follows.

150 homes would change the character of the area and neighbourhood.

Concerns regards highway safety.

Holton village and Halesworth would become one area.

Impact on the environment.

As there would be an impact on the health and education service would the developer be expected to contribute towards providing more services?

Would any of this build be on green belt land?

Noise and disturbance once the development was completed.

The roads in the area are not designed for large building construction vehicle.



**Graham Johnson**

Development of this site would be totally wrong on several counts:

- 1) This open space of grassland exists to separate Halesworth from Holton. If developed it would cause the village of Holton to effectively merge with Halesworth, thus losing their individual identity.
- 2) The existing sewage system which travels under Holton road and across the Blythe Valley to the sewage farm is already unfit for purpose. During periods of heavy rain in winter, the inspection covers in the valley are forced off allowing raw sewage to spew out onto the Millenium Green cycle/footpath on one side of the railway line and to flow into the River Blyth from another cover on the other side of the rail line. Severe winter storms seem to be becoming more frequent and the addition of 150 extra homes would simply overwhelm the system.
- 3) Hill Farm road is quite unsuitable for all the extra traffic that would result from development- It is already difficult on occasion to pull out of The Paddocks, as the view of traffic coming down Hill Farm Road is obscured by a 1.8 metre high garden wall , and speeding vehicles appear into view as you pull across.
- 4) Local Halesworth public services are already inadequate -at present it takes 3 weeks to get an appointment with your GP a totally unacceptable situation. There is a national shortage of GPs this is not a situation that any developer could satisfactorily solve.

Suggested Solution:

Pass a Bye Law forcing all second home owners in Waveney to have their properties occupied for at least 46 weeks a year. Why build on Greenfield Sites when thousands of second homes stand empty for the majority of the year. An absolute disgrace!

**Karen Johnson-Laird**

I believe that this area is not suitable for further redevelopment. The access roads are totally unsuitable for all the lorries that will need to access the site. This will cause absolute misery for all the houses surrounding the site and completely change the feel and atmosphere for those living near and next to the new housing. Not to mention all the years of noise and disruption.

I moved to this area 6 months ago and chose the Paddocks because of its quiet location and for it being on the outskirts of the town. My house would become part of a large housing estate which is what I wanted to avoid when I chose my final move for my retirement. The proposal to build 150 houses here is totally unacceptable - it will join up Halesworth up with Holton and put extreme pressure on the approach road to the Town Centre.

All this extra housing will put additional pressure on all the local services - Doctors Surgery, Schools, Car Parks etc. Our quiet market town will become another Beccles which would be a travesty.

Looking at the Growth Scenarios, Halesworth is getting a raw deal on all options which is very unfair and should be looked at again.

I cannot believe that this amount of extra housing is being considered for the town.

**John Joyce**



We moved to Halesworth because it is a beautiful peaceful town with acres of natural beauty and wonderful walks. By allowing houses to be built in this area you will be depriving future generations of beautiful countryside and adding congestion of huge proportions on Holton Road. Also the views we currently enjoy to the rear of our property will be gone forever.

### **Lesley Kingham**

#### **FLOODING**

Our major concern is one of flooding.

Area 65 is already very wet in large parts during the year. Currently rainwater drains through the fields seeping into gardens and the land just about manages to absorb it making some gardens soggy in the process. If the land is built on excess rainwater would have nowhere to go, therefore simply flowing off the roofs and roads, flowing downhill flooding the houses in Holton Road on its way to the river.

When the houses around Hill Farm Road were built this is exactly what happened and a house on Holton Road opposite the turning to Hill Farm Road needed a storm drain installed in front of it because it had been flooded due to the new building works.

Indeed, when the houses around Hill Farm Road were built the foundations needed to be very deep because the ground here is so wet.

#### **NATURE**

Area 65 is home to three protected species, namely; Sky Larks, Turtle Doves and Tortoiseshell butterflies.

#### **LACK OF FACILITIES**

We have already suffered the loss of the Middle school and Patrick Stead Hospital is soon to close. Do we have enough facilities to cope with another 150 families?

Building in this area would seriously increase noise and traffic, Holton Road has become very busy over the last three or four years and already suffers badly from speeding traffic, posing danger to both pedestrians (particularly because the paths are so narrow) and other road users. Only last year a car driving too quickly mounted the pavement and crashed into a wall, luckily no one was hurt. This would only get much worse with another 150 homes filtering onto this road.

### **Tony L**

This space provides an important strategic gap between Holton and Halesworth and as there are many better sites for development in the area, this one should not progress. Apart from the strategic gap it provides, any development would worsen flooding through run-off on both sides of Holton Road and increase the risk of sewage pollution.

### **John Lavery**

If this land is used for anything other than Agricultural Land or green space, then Holton becomes completely indistinguishable from Halesworth. This would destroy the character of the village and bring it into a bland urban sprawl. This is clearly undesirable for residents of Halesworth and Holton alike.

### **Edward Barnaby Milburn**



The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

### **Edward Barnaby Milburn**

This land is not suitable for residential development for the following reasons:-

- ▶ The land is remote from the town centre and residential development would exacerbate car journeys.
- ▶ This land forms a major part of the Strategic Gap (Policy DM 28 Adopted January 2011) and Open Breaks to prevent coalescence of Halesworth and Holton and maintain the open character of the high land and fields and ancient hedgerows that separate the two settlements.
- ▶ This land forms an important backdrop to the peaceful setting and high landscape quality of the Town Cemetery.
- ▶ There does not appear to be any feasible access to the land.
- ▶ Development on the scale suggested would impose an intolerable burden of additional traffic on the Holton Road.

### **Andrew Payne**

I am very disappointed that this site has come up for consideration. It forms, in my opinion, a sensible strategic gap between the market town of Halesworth and the village of Holton and should not be built on. The two should, in my opinion, be kept separate, not least because there are several brownfield sites available for development that MUST take precedence over greenfield site development. Backing onto the area, which when I moved here was used as farmland but has been lying fallow for many years (but very occasionally mowed) I observe other issues. First, the area has a number of natural springs (at least two to my knowledge), and the meadow acts as a sponge to stop excessive run-off of water through the houses and gardens on Holton Road. Second, if potentially 150 new homes were to be built on the area, all the traffic associated with the development (while building and when complete) would have to use the single entrance/egress of Hill Farm Road; that is far too much traffic for a small estate. Third, it is also populated and used as a hunting ground by a family of barn owls (almost every year that I have been living here, this family of owls has been evident. Moreover, muntjac and other slightly larger deer (plus regular smaller fauna such as hedgehogs and rabbits) are regularly seen in the field over my back fence (the main field has regrettably been closed to the public for more than a year), and my own pond that abuts it has newts living in it quite contentedly. In summary, I strongly oppose developing Area 65 because of its strategic greenbelt nature between two towns, access/egress problems, serious drainage concerns, and its environmental (mainly fauna) importance. Finally, I happen to know that Hopkins Homes was granted by the owner first refusal for site development many years ago (the owner of the land told me so). While that company does seem to build quality homes, their history of abiding by planning regulations (is very poor and the level of public trust associated with their developments is nil.

### **Jim Phillips**

We object strongly to the proposed building development for the following reasons.

When we purchased our property on Holton Road the views over the open land from our back garden was a



particular attraction and we would hate to lose it.

The supporting infrastructure, i.e. doctors, dentists and hospitals, barely copes with the present demand. Any additional housing in this local area will increase appointment waiting times far beyond acceptable limits. When we first moved to Halesworth we had to register at a dental practice in Southwold.

The increased traffic on Holton Road resulting from additional housing will increase vehicle numbers using the Holton Road/ Hill Farm Road junction by at least 150. Present traffic calming measures are ineffective/non-existent. We have already had our front garden wall replaced after being struck by a speeding vehicle!

Flooding has already occurred at junction on Holton Road with Hill Farm Road when Hill Farm Road development was underway. We are also concerned about flooding in our rear garden resulting from water run-off from the rising land north of Holton Road due to green fields being replaced with hard surfaces.

Halesworth will lose its identity as an individual market town due to the new housing extending from Halesworth to Holton across existing open spaces.

Also due to the rise in the land extending northwards from Holton Road would result in considerable loss of privacy at present enjoyed by properties along Holton Road.

#### **Peter Sanderson**

I object to the development of this land for the following reasons:

1. A stretch of land should be kept between the 2 separate settlements of Halesworth and Holton. Otherwise these 2 settlements would merge in to one, losing their very distinct identities.
2. The only access to the site is via a small opening from Hill farm Road.
3. It is an area rich in wildlife: deer, barn owls, newts in the pond, green woodpeckers etc. It would be scandalous to take this natural habitat.
4. The ground is often waterlogged in parts of the fields.....especially where there is a transition from sand to clay.
5. Holton Road would provide the main route to the site. This is already very busy with the majority of the cars exceeding the 30mph limit.
6. A public footpath passes through the north of the area.....this should not be lost.

Please see attached photos in support of objections to including Halesworth Area 65 in the planning strategy. These are an attachment to Comment ID 30.

This is how the fields look after prolonged heavy rain.

#### **Mrs Jane Saunders**

The proposed development will be out of scale with the existing housing. It would 'erode' the strategic gap between Holton and Halesworth and have a big impact on wildlife in the area (foxes, badgers, barn owl, heron, deer, green woodpeckers and butterflies to name some).

There would be more traffic on an inadequate road system and a loss of 'rural character' to the area. Any new



housing would overlook existing properties and the construction would cause major inconvenience. Housing would also result in the loss of cemetery land and cause disturbance to the existing burial ground. There is also a major flood risk. The fields are saturated all year round and major drainage works would need to be undertaken to address this problem on a grand scale. Housing on the other side of Holton Road leads down onto marshland which also floods regularly. Any new housing would need to be constructed with this in mind (flood protection = more cost) and may risk being unable to be insured.

### **Martin Saunders**

There are many reasons for significant concern regarding the proposed use of this land for development. The most significant issue would be the removal/erosion of the strategic gap that currently exists between Halesworth and Holton. Any "filling in" with development of this gap would eliminate any individual character these areas.

In addition to the concern cited above the following must be addressed as they are genuine reasons why this development must be rejected:

- ▶ Halesworth's infrastructure cannot support any additional housing without a significant improvement.  
One one supermarket (with the car park always full),  
No sports facilities in the town,  
One Doctor's surgery which is already at full capacity  
One Primary School  
Limited local employment opportunities
- ▶ The area discussed in this submission (No 65) is regularly subject to retaining significant levels of ground water close to the surface/minor local flooding and would require significant expensive ground works to properly address
- ▶ The area discussed in this submission (No 65) has a significant amount of wildlife – badgers, heron, deer, woodpeckers, foxes and a barn owl as well as a thriving pond in the centre of the plot. All will be adversely impacted by this proposal
- ▶ Development of this site will also result in existing dwellings being overlooked and privacy impacted

In summary, the justification for development if this site and others identified in the consultation must be very carefully considered. If, as a local planning authority you consider there is a genuine requirement for development of currently unused land in the Halesworth area, I feel strongly that area No65 has a number of significant reasons why the proposal for development **must not be supported**.

### **Sonia Southgate**

I strongly oppose the proposed development of the site detailed above. For the following reasons the development would be detrimental:

Lack of appropriate/safe access to the proposed site

Poor existing drainage that would not cope with additional use

Regular sightings of wildlife in this habitat that is potentially to be developed including Barn Owl and Muntjacks. These species are already endangered in our area.

This site is the only green belt between Halesworth and Holton.

I am sure that this site could be put to better use, a solar farm for example or used for arable farming. There



are other more appropriate sites in the Halesworth area that will not be of detriment to others if developed.

### **G H Thomas**

I hear so often the need for more building of houses to allow people to afford to live in a particular area. Halesworth and Holton could do with more but it must be very carefully considered so as not to create a huge problem of literal flooding and the social and economic fallout without considerable expansion of doctors/health facilities, road networks, bus services, train services. We live in an age whereby we are all told to walk or cycle more but the facilities for these are very poor if there is to be an increase in road traffic on existing highways.

The proposed land for development on site 65 has the potential to undermine any property along the boundary due to the potential for flooding. The land so far this year April 2016 has not dried out. It has been wet for at least 5 months now and has standing water in many places despite there being more than adequate drainage and ditches being re-instated. If site 65 is developed it will flood, no matter what is carried out by the developers to alleviate the problem. The land has not been designed by nature to take such vast amounts of concrete. The land acts as a sponge which can not work with an increase in hard surfaces. The run off from road and pavement areas as well as the properties themselves has to go somewhere which will be to the neighbouring properties further down hill along Holton Road. The land adjacent to the site which is not built on will become a continuous shallow lake due to the water trying to find an area to settle.

This I am sure is of no consequence to those wanting the land developed so long as they can give the appearance of flood management as laid down by local government. This is not enough and has the potential to create future problems for the properties being able to get insurance and safeguard homes. Will WDC and Suffolk county council give an assurance of paying out substantial compensation if they give the go ahead for any substantial development.

### **marcia walker**

The views, natural habitat and space behind our house was one of the main reasons my husband and two young children moved in to this house seven years ago. We feel strongly that building such a large quantity of houses in this area would have a negative effect on our personal lives and on the environment. Our youngest child is already worried that if they build houses we might have to move.

In terms of the natural environment, we have some serious concerns should this ambitious building project go ahead:

- We feel that the following animals, seen regularly in this area, would be under threat should their natural habitat be taken away: Hedgehogs, Skylarks, Barn owls, Deer, Foxes, Turtle doves, Tortoiseshell butterflies, Sparrow hawk, Woodpeckers and Bats.

- The land is used daily for dog walking and walking and is an opportunity for people, especially children to engage with nature.

- During winter the ground holds a good amount of water that is able to soak away, we are concerned that if this land is built on we may have excessive water entering our property and flooding could carry on beyond to the houses on the other side of Holton Road.

- 150 houses seems to be an excessive number that may be too high for local services and infrastructure to support.

- This site is surrounded by many houses on two sides that will all be affected negatively by noise and traffic pollution, flooding, property value.



### **M Whiting**

Run off water would go immediately to the rear of Holton Road creating more flooding which would ultimately affect the 'Millennium Green'. This area is supposedly for the enjoyment of Halesworth residents but would be seriously compromised. There are now no secondary school facilities here which presents costly transportation of all pupils over eleven years of age some nine plus miles to Bungay.

I have had to wait up to four weeks to see my doctor – how long will I wait with up to another six hundred people on the surgery list.

What happens to the wildlife which this area supports such as barn owls, green woodpeckers muntjack deer and I am given to understand there are great crested newts in the pond at the top of the field.

### **DC Patrick Newsagents (DC Patrick)**

When are they going to build there.

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### **Halesworth Town Council (N Rees)**

Site 65 is in the strategic gap between Holton and Halesworth. This gap is important to both settlements. It is necessary to preserve the character of each. There are two natural springs that drain into the main filed. As with other proposed sites, there is only one road serving the residents. The proposal for the addition of 150 houses requires considerable improvements to the infrastructure of the area and the town. School places, medical facilities and drainage and sewage problems. The location of this site, with so much open land behind, has allowed owls and deer to use this area. Development would damage greatly damage this.

### **Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to north and Hill Farmhouse grade II listed to south. Potential impact upon setting of Listed Buildings.

### **Hopkins Homes**



Following the previous Representations made to the 'Call for Sites' Consultation in January 2016, Hopkins Homes would re-affirm the suitability of Site 65 to provide for sustainable housing development, incorporating significant new areas of strategic public open space, together with a potential extension to the existing Cemetery, as detailed upon the previously submitted Feasibility Layout Plan.

The site lies in a highly sustainable location, adjacent to areas of existing modern housing and within walking distance to the town centre and railway station.

As detailed upon the previous Layout Plan, the site has the potential to accommodate up to 150 dwellings within the south-western parcels, together with significant areas of new dedicated strategic open space to the north and east, thereby ensuring that the desired physical separation between Halesworth and Holton is maintained.

Feasibility sketch and site boundary map attached.

#### **N/A (Lorraine Thomas)**

When there was a consultation about possible development of this site many issues were raised against such a development. The land around this site floods and there is standing water for most of the Winter and for many Summer months when we have a period of consistent rain. This has since worsened because our climate is changing. Our Winter and our Summers are wetter and the forecast is that this will be a feature rather than an anomaly. I was under the impression that the Council was going to use the land (if suitable) for the necessary expansion of the cemetery? Hill Farm Toad is not suitable for more traffic and the entry and exit to the road from Holton Road would be dangerous. Road not Toad sorry. I am partially sighted! There should be a strategic gap between Halesworth and Holton. Tourists are so important to our area. The fact we are not over developed is a large appeal. The schools and the Cutlers Hill Surgery are over stretched now. There are many elderly who need resources and there is a large pre-school population in the area. Holton Rd is often difficult to travel on. Parking by the bridge etc. There is a need for sustainable, affordable housing but the land itself is unsuitable and its position is also unsuitable. Please keep me informed of any "developments" please. I only contacted you because I received an anonymous letter outlining this issue again. If anyone would like to come out and survey the land from my property they are welcome. It is dry at the moment but if it rains for a sustained period it will flood and/or have standing water. I have to deal with this. I accept this is my personal responsibility but I would not be able to manage a worse situation because of building. Thank you for reading this. Please contact me if I am able to provide you with more information. Yours faithfully Mrs LS Thomas

#### **Retired (Sylvia Briggs)**

I live in Hill Farm Road and am extremely concerned about the proposal to build 150 houses on adjoining fields (Area 65).

#### **Inadequate road access**

The site is only accessible via Hill Farm Road which is inadequate for the increase in traffic that would result from the building of 150 new houses. This development would put a huge strain on Hill Farm Road as well as Holton Road and the local infrastructure. Many of the new homes would have more than one car which would further exacerbate the traffic problem.

#### **Green Field Land**

The site is green field land outside the built up area; construction of 150 houses would not be consistent with the Core Strategy which recommends development only on brown field sites.

#### **Wildlife Habitat**



Skylarks, a “Red List” bird of high conservation concern and fully protected under the Wildlife and Countryside Act 1981, nest in these fields, which the land owner seems fortunately to have left alone for some years. Naturalists place high value on such habitats where rough grassland and bramble blend into mature gardens of existing houses. Such places are rich in insects, birds and reptiles. We should be encouraging these sites, not destroying them.

Open space landscaping among residential housing, which would no doubt be promised by developers, would only be of interest to residents’ domestic cats and those needing to walk their dogs. All very pleasant but of no use to wildlife which would inevitably be driven away for good.

### **Water Run Off**

The fields are often wet and boggy and run off has been known to cause problems to the gardens along Holton Road. Climate change experts predict wetter winters and more extreme rainfall. Development of roads and buildings on these fields would increase the risk of flooding, and there is no reason to take such a risk.

### **Holton**

Holton is a village separate from Halesworth. If this proposed development went ahead, it would lose its identity and simply become part of Halesworth town.

The rural landscape between Halesworth and Holton is worth preserving.

For the above reasons I **object** to this proposed development on Site No. 65.

### **Retired (Sarah Tallis)**

Living in Holton Road, below the site apparently being considered for the development of 150 houses, I find it difficult to believe that there would be adequate access to this land via Hill Farm Road. Also there is enough water being drained off the field behind Holton Road, without a further development. Furthermore, there is a barn owl regularly patrolling these fields and also skylarks nesting here each spring. Halesworth is always being admired as a town with green, enviable green spaces why spoil it. I can appreciate that in years to come the land might be used as an extension to the cemetery. My neighbour, Mr Les Tennet, who lives at No.19 but is not on line, wants to join me in registering his opposition to this proposed development.

### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 65 as stated in the WDC Green Strategy, the strategic gap between Halesworth and Holton is important for the character of both communities and should be protected. However the north western section of this site could have limited development.

### **Thimble lily design (Hannah Sheffield)**

My partner and I would like to object to any future development on site 65 inclusive of the latest proposal for the construction of 150 new dwellings. We reside at number 25 Holton road and back onto the said fields. We live approx 100 yards from the village of Holton and find the idea of filling the strategic gap separating Halesworth and Holton to be a great concern. Holton will lose its identity as a separate settlement and just become a borough of Halesworth which we believe to be fundamentally wrong. Further to this the main



highway of Holton road would not comfortably support the potential increase of traffic. Also with us backing onto the fields we are aware of the abundance of wildlife that would be undoubtedly compromised by such a development, barn and tawny owls nest on the site yearly, with foxes visiting our garden on a regular basis, wild orchids can also be found growing. We first chose to live in the community of Halesworth because of its rural location, we believe this will be compromised with the plans set out. Our last concern regards the lack of infrastructure in the town. Halesworth has no sports facilities, no hospital, no secondary/high school and has just lost the Norfolk and Suffolk skill centre. We believe the council should invest their time and energy in resolving these issues before trying to increase the population of Halesworth. I hope you take on board our points of view and not just conform to government building quotas.

## 66 - Land north of 1-4 East View, St James Road, All Saints and St Nicholas South Elmham

### Historic England (Debbie Mack)

Whaleys grade II\* listed building to west, The Elms, also grade II\* west and a number of grade II listed buildings including The Willows and Barn to the north, and All Saints cottage to the south and Moat Farmhouse to the east. Potential impact upon high grade and other listed buildings.

## 67 - Land north of Chapel Road, Wrentham

### Kevin Cross

25 Homes on land north of Chapel Road seems like a good idea to me. I live in the village and would be in favour of such a proposal.

### Benacre Estates Company (Edward Vere Nicoll)

Land north of Chapel Road was submitted to the Council's Call for Sites in October 2015.

The site extends to approximately 1.02 hectares and could accommodate in the region of 30 dwellings (based on 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

Development of the site would represent a logical extension to the village along Chapel Road. It is enclosed by residential development to the south and east, and the western boundary is formed by a dense tree belt. The land to the north of the site is also within our client's ownership and available for the development, should the Council consider this appropriate.

The site is not subject to any landscape constraints (as identified on the adopted Proposals Map, 2012) nor is it in an area of flood risk (as identified on the Environment Agency Flood Maps). It is anticipated access will be taken from Chapel Road.

### Historic England (Debbie Mack)



Proximity to United Reform Church grade II\*. Potential impact upon high grade Listed Building.

**Wrentham Parish Council (Frances Bullard)**

As a Parish Council we would ask that previous concerns raised regarding density, infrastructure, recreational space, increased traffic and parking are taken into consideration should a planning application be considered.

**68 - Land North of Charters Piece, Willingham**

**Caroline Ellis**

I strongly oppose the development of this site for housing. Aside from the fact that it will destroy the enjoyment of my house and garden, there is no direct access road to this site so any construction traffic will pass very close to my property. It is my opinion that this, along with ongoing building works so close to my home would likely result in structural damage to my Grade II listed property.

Also, this land is used as a hunting ground by a pair or barn owls; it is likely that the destruction or development of this habitat would have a detrimental effect on the chances of their successful raising of young and, ultimately, their survival.

Development of this, and indeed the other green field sites in the village, would have an adverse effect on the overall character and feel of the village. There are no amenities here in the village (unless you count the pub, fabulous though it is) and transport links are poor. I would also raise the issue of the nearby sewage treatment plant and the suitability of placing residential properties so close to an odorous and potentially dangerous installation. It is not clear if this plant has the capacity to manage the output of a large number of new residences in the village.

There is a site, previously housing some static caravans, to the rear of the Shadingfield Fox public house, that could, however, be a suitable site for a small number of new residential houses or flats.

**Historic England (Debbie Mack)**

Proximity to Fox Farmhouse grade II listed building to north. Potential impact upon setting of listed building.

**Not applicable (John B Pettifer)**

My comments relate to both Site 68 and 134 of the Planning Proposals.

Site 68

Item 1: This is a land locked site.

Item 2: This piece of land is heavily water logged during the winter period, or following heavy rain.

Item 3: It will have negative effect on the rural character of the village.



Item 4: There is very limited public transport from this area.

Item 5: There are little or no amenities within the Village of Willingham St Mary.

Item 6: Any proposed construction is likely to effect the habitat of existing Barn Owls within the area.

Item 7: The nearest hospital and school are in Beccles some 3/4 miles away from the proposed site.

#### Site 123

Item 1: If housing development is required, this may prove to be a better site in respect of road access and general accessibility.

Item 2: A better proposal may well be residential development north side of London Road to the rear of the Fox Public House, which is currently has permission for static mobile homes.

#### Sotterley Estate (-)

##### Site Description and Development Potential

5.1 Site Option 68 is located north of Charters Piece and northeast of the playing field and is currently agricultural land (Grade 3). A plan of the site is included in Appendix 5. As an alternative to the representations for Site Option 134 above, Site Option 68 could be allocated for housing. Access could be provided via land in the north of the playing field. This could include an area for dedicated parking for the playing field reducing the need for parking on the A145 for village events.

5.2 The site is 0.64ha in size and is well related to the built form of the village. It is a square shape and has a flat topography. According to Policy DM16 a density of 30dph would indicate a minimum of 19 dwellings on this part of the site.

**5.3 More appropriately and reflecting the density of surrounding development this site could provide for around 10 to 15 dwellings (including 3 to 5 affordable homes) arranged in a manner sympathetic to the site and its location.**

5.4 This could also include a vehicular access route through the north of the playing field site (as identified on the map in Appendix 5) with new parking provision for the playing field.

The site is bounded to the northwest and southeast by residential development, the playing field to the southwest and agricultural land to the northeast.

5.5 The location of the potential vehicular access has good visibility onto London Road. This would require relocating the existing play equipment elsewhere within the playing field but this would not be a significant exercise and would also lead to improvements and an increased level of safety and security on London Rd.

##### Response to Issues and Options Consultation and Site Sustainability Appraisal

5.6 Consideration of Site Option 68 alongside Site Option 134 means it scores better in the Site Sustainability Assessment (SSA) than on its own.

5.7 Development of the playing field would necessitate moving it to Site Option 68 on a like for like basis. A



village focal point would be retained on Site Option 134.

6.0 Providing the village recreation facilities on Site Option 68 could include an area for dedicated parking for the playing field reducing the need for parking on the A145 for village events.

## 69 - Land north of Church Lane, Ellough

### Rachael Staniul

Insufficient road access – narrow road with passing places.

Loss of a rich wildlife habitat, including buzzards, owls and bullfinches.

Bullfinches are already in decline due to loss of nesting habitat. They are classified as an amber list species in the UK, under the Birds of Conservation Concern Review, and are a priority bird species on the UK Biodiversity Action Plan.

A full survey would have to take place to access the full range of wildlife here, and what impact such disturbance would have.

If “Waveney has no significant areas of sensitive wildlife habitats,” as stated on page 39, then why are sites rich in wildlife being chosen for possible building.

## 70 - Land north of Hall Lane, Oulton

### Badger Building (Edward Gilder)

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

We note particularly that adjacent to site 70, additional land to the north has been promoted but is constrained by access from Union Lane. We think that there is merit in looking at a comprehensive proposal for development in this area which can embrace the re-use of the Lothingland hospital site with a comprehensive scheme for access and new housing, served off Somerleyton Road and we would be pleased to discuss this proposition with you.

### Environment Agency (-)

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### Historic England (Debbie Mack)

Proximity to Blue Boar Inn, grade II to the north east and the Manor House grade II \* listed to the east.



Potential impact upon the setting of high grade and other listed buildings.

**Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

70 Land North of Hall Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

**71 - Land north of Hulver Street, Henstead With Hulver Street**

**Nick Carter**

I strongly object to the development of this rural site. The site, a grass field managed for hay and with low density grazing, lies within the AONB and is currently an established site for several breeding pairs of turtle dove, the UK's fastest declining farmland bird species, and has been since at least 2014. It is also used regularly by other bird species of conservation interest such as barn owl, buzzard and red kite and species such as swift, which nest in the village, feed over it regularly. A housing development on the site would destroy this critical breeding site for turtle doves and affect other species adversely and therefore represents a serious loss of biodiversity. The scale of the development is also out of all proportion to the size of the village and would change its character. The B1127 is an increasingly busy road with the opening of the anaerobic digester, parachuting organisation, crematorium and industrial site expansion and a large housing estate would add considerably to this and make the road even more dangerous. There is no mains drainage in the village and a development of similar size to the village or larger would add to drainage and possibly pollution issues. Flooding of the Hundred River, especially in the lower sections of the grass field, is also an issue.

**Mrs Moore**

We consider this site is totally unsuitable for a housing development of 60 homes as it would put a mini Housing Estate in a totally unsuitable area with no facilities or services.

There is no public transport through the village so all journeys would have to be taken by car to beccles, Lowestoft or Norwich for shopping, medical facilities, leisure/entertainment. 60 houses could easily include well over a hundred vehicles and access onto the B1127 could cause a lot of problems.

The area has no schools, doctors, or even village shop. There is nothing (not even a safe play area) for young children, no recreation for teenagers, no meeting place for the elderly and we therefore oppose this site for housing development.

The area could possibly be utilised for an alternative purpose to add benefit to the existing residents in the area. a dedicated open space could be an ideal place for dog-walking, sports facilities and/or a children's play area. It might also be suitable for a Medical Health Centre, Day Care centre or Recreation Centre to give people somewhere to meet in the day or evenings.

**Henstead with Hulver Street Parish Council (John Armstrong)**

The Parish Council considered the questions you asked it to provide information about. They agreed that the proposed sites for possible development were unsuitable in terms of the number of houses projected for the sites. As I explained in my previous response the Councillors did not feel that they could respond to the other questions about jobs and facilities until after the consultations with residents in the development of the



neighbourhood plan.

#### **Suffolk County Council (James Cutting)**

The county council welcomes the reference to the Beccles South Relief Road and encourages the district authority to mark the route on the Beccles site map. Subject to any further assessments, the proposed level of growth around Beccles is generally acceptable with the exception of the following sites 124, 50, 71, and 77 since these are all further out from the town centre and less likely to encourage sustainable travel choices.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 71 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

### **72 - Land north of Lowestoft Road, Beccles RUFC Common Lane (land north west and south east of Common Lane), Beccles**

#### **Anonymous**

Site 72 unsuitable for development.

#### **lesley beevor**

This site is part of the Waveney Valley Landscape and forms the natural break between Worlingham and Beccles. It forms the natural habitat for kestrels and barn owls. The majority of the site is floodplain/marshland. The impact of local flooding around the area would increase should there be any development. The site has a designation whereby development should be a last resort - as there are many other less environmentally sensitive sites being offered around Waveney this site is not critical for Waveney's development plans. In the Worlingham Parish Plan - 74% of respondents advised that the environment around Worlingham is 'very important' and a further 21% said it was 'important.' In accordance with the Green Infrastructure Strategy this site should not be considered as a prime development site.

#### **Graham and Sue Bergin**

This site should never be developed for the following reasons:-

##### **1) Land status**

The land carries a status whereby no development will be considered unless there are absolutely no alternative sites. There are plenty of alternatives – the logical place for any large scale development round Beccles is Ellough and land to the South of the town, i.e. land which will be encompassed by or adjacent to the new Southern Relief road.



We own Pinetrees, the site adjacent to the East of Site 72. When we bought the land in 2001 it came with planning permission for a block and render bungalow. When we sought to vary the consent, so that we could erect an environmentally friendly dwelling, we were told by Waveney DC that our site formed part of the Waveney Valley landscape and no additional development would be entertained. This must apply even more strongly to Site 72 as it is much more visible than Pinetrees, both from Lowestoft Road and the common.

In July 2015 a 'Green Infrastructure Strategy' was adopted by Waveney District Council and 'open breaks' are mentioned in this document. On page 27 it states that 'the open countryside located to the North side of Lowestoft Road between Marsh View and Park Drive (i.e. Site 72) should be considered for protection as an open break as part of a future review of the local plan'.

The summary table on pages 36 and 37 states that Site 72 provides visual amenity and physical separation between the built up areas of Beccles and Worlingham. The recommendation was to seek to protect the open character and setting of the area and to consider designating the site as an 'open break' as part of a review of the local plan. Benefits were stated to be protecting the setting and character of the two settlements.

## **2) Overcrowding of already congested roads.**

The development of Site 72 will put unwelcome additional traffic onto the already inadequate local roads. Every day we see queues of traffic formed along Ingate since Grove Road was made one way – indeed, it is not uncommon for traffic to queue from the Peddars Lane traffic lights, up Ingate and past the Ellough Road traffic lights along Lowestoft Road.

The Common Lane/Grove Road area cannot cope with any more traffic as it is already busy due to the high number of car trips made by dog walkers heading to the common and also the large volume of cars at the weekends when there are field games.

## **3) Strain on already struggling sewage systems.**

We believe that previous development applications have been refused on these grounds – what has changed? We understand Worlingham Marsh Lane sewage treatment works to be at the limit of capacity. Worlingham Ash Tree sewage treatment works is being pushed ever closer to capacity as a result of piecemeal development in the area. If this development went ahead, new and existing households in the area are likely to suffer from sewage removal problems unless the sewage infrastructure is radically updated to cope with the extra households.



#### **4) Strain on water supplies.**

Some homes in Worlingham are already suffering from low water pressure at peak usage times.

#### **5) Environmental risk.**

At least 70% of this site is tidal flood plain or marshland. We understand that current environmental policy is not to permit building on flood plains. With global warming and rising sea levels the situation will become ever less favourable for development. Any houses built in known flood plains will find it difficult or expensive to obtain insurance against flooding.

Development on the proposed scale within the flood plain will reduce the area available to cope with flood water. This will render our and other low lying property in the area more vulnerable to flooding. We, and we expect, other residents, will look to take legal action, via our household insurers, against Waveney DC if this situation arises. Please note that the houses recently built in this area have already experienced problems with drainage – the ditch which runs towards the corner of our land had to be dredged and the outflow remains weak.

#### **6) Habitat.**

The land is extremely important hunting ground and habitat for barn owls and kestrels which reside on and around the land.

**stephanie clarke**

I cannot believe this land has been submitted. It is marsh land & many times it is water logged. It's dykes used to be used to take the access water away from the river to avoid flooding the quay & low lying areas of the town. The land provides homes for a large variety of wildlife including Barn Owls, Buzzards & a large population of water vole. The sports facilities are heavily used (these pitches, esp during winter suffer from waterlog) and it is wrong to take these from its users.

**Teresa Cooper**



In line with the Green Infrastructure Strategy we believe that the 'Open break' between Beccles & Worlingham (designated site 72 on Consultation document) should be preserved.

This open break provides vital breeding and habitat grounds for barn owls and kestrels. On this site we have also seen, foxes and cubs, herons and many other varieties of birds. This wildlife would be lost if this Open break was lost.

This open break also provides much needed marshland for surface water to drain to. As residents of Lowestoft road we regularly see (during a downpour) the Lowestoft road looking like a river. Currently water can drain quite naturally down to the marshes. If this land is built on, the water would quite naturally drain into peoples houses! With our property on the Lowestoft road it is clear that water from behind our house (Ellough Road upwards) drains through our land down to this marshland. The Quay already floods, by building housing on other flood plains it will just raise the water levels in these risk areas even more. There are higher areas in Beccles that could be built on. For example extending the housing at Ellough.

Beccles has very few green areas for the public to enjoy. There are no communal gardens. The only areas are the quay (swamped by holiday makers in the summer) the Puddingmoor play area (swamped by mud and water in the winter) and the common. The area proposed to be built on can very clearly be seen from Beccles common. It will hardly be a relaxing area to enjoy if within a few hundred yards there is mass housing stretching right up to the Lowestoft road.

There are better alternative sites for development than this. The surrounding roads will not handle the increased traffic of this development. Sewage and water services are at or near capacity and will not support 130 additional homes.

#### **Susan Doherty**

Most of this land belongs to the people of Beccles, bequeathed to us in 1584 by Elizabeth I in a legal document named 'Beccles Charter', and is named Goose Green. Why is this area on Waveney's potential development land? Who put it into this plan? Who is the developer named as 'origin'? This land is charity land, has the charity commission been informed, have the owners been consulted, namely us the inhabitants? Has our land been sold behind our backs?

#### **Susan Doherty**

I am writing with concerns over site No 72 on your map – Beccles RUFU Common Lane, land N.W. and S.E. Common Lane, housing and open space, number of homes 130.

This land belongs to the inhabitants of Beccles town, bequeathed to them in a Charter dated 1584 by Elizabeth I, and ratified in 1605 by James I. Beccles town council manage this land on behalf of us the rightful owners as part of our ancient fenland.

Why have we the owners not been consulted on this matter as by law we should have been?

Why is "Developer" listed as origin and who is this developer?

When was this land taken from its rightful owners and where is the proof?

This is an extremely serious matter to which I should like some answers.

#### **John Eade**



I live close to this site and consider that it is not suitable for significant development. It forms an important green corridor between Beccles and Worlingham and is important to the nature of the Waveney Valley. The site has reed-beds on it and development will cause additional problems with flooding in other areas of Beccles. The site is important for wildlife with deer, owls, marsh harriers and many other species regularly being seen on it. Access to the site is also difficult and will cause significant traffic problems.

**Nicky Elliott**

I believe none of this land should be developed. The land has two different owners - a Mr. Smith (land immediately north of Lowestoft Road), and Beccles Fenland Charity (The north west section behind the railway station). Mr. Smith's land has been designated an 'Open Break' between Beccles and Worlingham as it has high value for residents as a green open space between the two parishes. The Fen Charity land is administered on behalf of the people of Beccles by the Trustee, Beccles Town Council, of which I am a councillor, and the Trustee does not want to see development of any kind on that land.

**J Featherstone**

Part of this site belongs to the inhabitants of Beccles which needs to be separated off. Apart from this the other issue is the lack of an open break between Beccles and Worlingham, we need to have a corridor of open space which will be lost should any building be allowed to go ahead on this site.

My other concern is of flooding in this area, this is already listed on the environment's plan as a great flood risk area.

I consider these two above mentioned concerns to be extremely important when looking at site 72, may I suggest it be removed from the plan.

**Charles Fortt**

Open land, especially allotments and proposed sites near common land, should not be developed intensively so as to eliminate all open space near Beccles town centre.

**Paul Gurbutt**

Is this not an area of Beccles Fen which is charity land and does not belong to WDC but the Trustees.

**Mr Haycock**

Site 72 seems singularly inappropriate for significant development, given its fenland character. Also, it represents a long-standing northern 'break' between Beccles and Worlingham.

Repeating my earlier request that Worlingham be separated from 'Beccles with Worlingham' in this planning exercise, I would not like to see massive dormitory developments built on sites such as site 82. Development should be 'pocket like' and proportionate to the size of the village community.

**Rosemary Hewlett**



I attended the consultation on 4th May at Beccles and am very concerned about one of the areas on the map shown in blue number 72. Part of this land either side of Common Lane, now a cricket pitch and a rugby field, are part of the Charter Lands and belong to the people of Beccles. This land, containing a sports complex, is at the moment part of an investigation by the Charity Commission and Waveney District Council. The land should be registered as charitable even if it stays with WDC as trustees and therefore until this matter is resolved I do not see how it can be put forward for development.

I have already responded to the Larkfleet consultation which is number 82 but will reiterate again here. This is too big a development for a small town like Beccles which is suffering already because of traffic/parking issues and lack of doctors' surgeries.

We are also very short of open spaces suitable for children to play and feel this needs addressing before any more houses are b

### **Chris HOLMES**

I object to proposed development on this site on following grounds:

(1) Most of the proposed development is on a floodplain/marshland and would significantly reduce capacity for water to be absorbed naturally. This is a particularly important concern of mine as I reside in Old Farm Road, Beccles, a low lying area. I have already had to raise the level of my rear garden by some 9inch to alleviate flooding problems in inclement weather (one third of garden area under 6inch of water). Having watched the development of the four bungalows & two houses on the Brick Kiln Farm site, I noted that during the footings/foundations stage of building, the site had to have water continually pumped away. The dwelling constructions have now been completed and I note that work is already being undertaken to alleviate surface water dispersal problems.

(2) Sewage and water services in the area are at or near capacity already.

(3) The roads in the area are not wide enough to handle the inevitable increase in traffic volume that would be generated by additional housing.

(4) The land in question is part of the Waverney valley landscape and is home to a host of wildlife. Prior to the relatively small development of the Brick Kiln Farm estate, it was a regular occurrence to see pheasants, partridges, monk jack deer and the occasional fox wandering on the street outside my house. Not anymore.

(5) There are better alternative sites for development.

### **andy house**

although this might be a natural fill in area I think that the access routes would be problematic. There could be no link onto the A146 and linking to the centre of Beccles would add to congestion with the railway line getting in the way. linking to the lowestoft road would need lights or roundabout and would add traffic back on to the congestion at ingate

### **Stephen Malster**

The land sectioned on the attached map as No – 72 includes the land that I rent from Beccles Fenland Charity Trust, that has been leased for use as a wholesale nursery (horticultural) since 1969\* and town records denote



this area for agricultural/horticultural use since at least 1850.

My understanding is that the land legally belongs to the people of Beccles as common land and was in the process of being registered under the new Beccles Fenland Charity Trust.

I would therefore contest that this land could not be sold neither be considered for potential development even at only preliminary stage.

It is also low lying land that I have personally experienced flooding to an approx. depth of 18 inches, twice during the last 30 years.

The land available also via Common Lane causes significant traffic flow problems when existing facilities are in use.

Please inform me of any issues in relation to the land.

\*Beccles Museum.

### **Mr Manders**

This land is of huge value and interest to the people of Beccles not only does it contain the sports pavilion, scout and guide hall but also the youth football and rugby clubs pitches, this is used by hundreds of Beccles people both young and old. The land adjacent to the Lowestoft road allows a special view over the marshes and on to the common which has a lot of history for the town. I have personally seen barn owls, bats, deer, hedgehogs and foxes and a huge verity of birds. I'm sure building on this land would have an iriversable and detrimental affect on the wildlife.

### **Andrew Nainby**

Development here would be a disaster.

First and foremost the road infrastructure is totally inadequate. There would be no exit to the north because of the common, or to the east because of existing dwellings. Traffic (potentially 200 extra vehicles) would have to use the narrow roads and one way system to the west or add to the traffic on Lowestoft Road. This frequently backs up at weekends and dramatically so if there is an accident on the northern bypass (A146).

A large part of the site is on the flood plain / marshes. New dwellings would be vulnerable to flooding and the natural drainage capacity would be reduced.

It would destroy the Open Break between Beccles and Worlingham, comprise the tranquility of the Common, and threaten wildlife - particularly barn owls and kestrels that use the area as a hunting grown (although that would probably be good news for the rats!).

I understand that the area has a designation whereby development will only be permitted if there are no alternatives. There are alternative sites to the south of Beccles and the East of Worlingham where the transport infrastructure is more resilient and the drainage issues less severe.

### **Marya Parker**

This development would remove the last remaining space between Beccles & Worlingham making them contiguous. Some separation between the two settlements is desirable.

### **Ronald Pigney**



I would like to strongly oppose the development of this land on the following grounds:

This area is regarded as part of the Waveney Valley landscape with a natural break between Worlingham and Beccles.

There could be adverse consequences of developing on this marshland/floodplain - reducing the absorbency of water and therefore increasing risk to low lying properties.

From our garden we have seen muntjac deer, foxes, snakes, numerous birds including buzzards, barn owls, tawny owls, black caps, woodpeckers, doves, tits, finches etc. This would seriously threaten their existence.

These roads were never intended for this level of extra development, particularly Grove Road in terms of access and parking.

I would like to strongly recommend that should there be a requirement for development, that the Ellough Road site proposed would be a far better proposition due to the new access road linking London road and Lowestoft Road.

#### **Sue Rhodes**

Please do not develop this land as we have so little green space in Beccles and it is widely used for sports activities. Besides which the roads would not be able to cope with even more traffic.

#### **nicholas roe**

In answer to the question ninety five and ninety six in the consultation document. The land has always been a natural break and is regarded as part of the Waveney valley landscape most of the proposed development is on floodplan/marshland and would reduce the capability of the land to absorb water with potentially adverse consequences for residents for low lying properties. The site currently has a designated wherby development will only be permitted if there are no alternative. In answer to question seven Beccles doesn't need allocated any more than 10-15% housing as part of the local offer. The consultation document shows clearly that there are many better alternative sites for development. Sewage and water services in the area are at or near capacity. One hundred and thirty additional homes will not help the situation. The roads in the area were intended to handle the additional traffic this development will cause. The Green Infrastructure Strategy supports the need for green spaces which supports the network of wildlife. The land is prime hunting ground for kestrels and barn owls.

#### **Sharon Shersby**

This site covers the children's football pitches, the Wasps have put in such a lot of effort to clear and make this safe for the children to play on, it also includes the cricket field where Beccles Cricket Club plays, were the Tennis courts are, the Brownie /Scout hall, indoor bowling centre and the May Centre are located. It was rejected in the last round of your "future plans because part of it is in a flood plain, its a natural break between Beccles and Worlingham and it was outside the current town boundary. It was indicated in the last plan you had Beccles would get more sports facilities but all that has happened was you took away funding for the pool. There are so many reasons this site is not appropriate.

#### **Barry Spall**

The break between Beccles and Worlingham needs to be retained. This land constitutes the only open view



eastwards remaining in the Waveney Valley. It is a rich natural source for flora, fauna and supports barn owls, kingfishers, kestrels, sticklebacks and much more. The land is situated on flood plain and adjacent to marshes. The recent development at Brick Kiln Farm has encountered major water problems from springs requiring continuous pumping and piping water to adjacent marshes. More building would lead to more water absorption to go where? The current sewage and water services are at full stretch. Health services, schools cannot take additional population and the roads not suitable in the area for further development. I have with permission of the deceased former owner walked this area for over thirty years, it is not suitable for building and will lead to enormous problems if developed. This land requires protection to avert potentially drastic environmental disaster.

### **Judy Taylor**

Our view is that existing infrastructure, ie Medical and Dental services, roads, schools, water and sewerage services simply do not have the capacity for such a development. If this number of homes were to be built on the outskirts of Beccles it would result in an influx of around 7,500 people - imagine the adverse impact on the existing residents.

### **Pat Took**

I was horrified to see that Site 72 appears to include all the land which is currently used as sports facilities - rugby, football, tennis, etc. - and allotments. I agree that as the population increases there will be a need for more housing, but I also hold the view that the more "built up" an area becomes, open areas for sports and outdoor activities become even more important, for the health and well-being of the local residents. It seems a very retrograde step to even consider using this land for building.

Quite a large proportion of the land within Site 72 is prone to flooding; whilst this is an occasional nuisance to sports organisations, it would be catastrophic if it were to be used for housing. Additionally, the construction of buildings on flood-prone land would exacerbate flooding issues because water would not be able to drain away.

The existing roads in this area - Common Lane, Old Farm Road, Grove Road etc - are relatively narrow, and would struggle to accommodate the inevitable increase in traffic if more houses were built, and there appears no option to construct wider access roads.

The marshland which lies between Old Farm Road and Worlingham Park Drive is an unspoilt habitat for a varied assortment of wildlife (including Barn Owls), and the open view over this marshland from Lowestoft Road towards Beccles Common is one of the jewels of Beccles. Destroy this, and you take away one of the things which make Beccles a special place for residents and tourists alike.

To sum up, I strongly object to any further development of land within Site 72, at any time in the future.

### **Councillor Caroline Topping**

Regarding where the new homes/businesses should be built. Plot 72 in Beccles is currently a mix of farming land, plus all the rugby, football, cricket, tennis provision in Beccles. If I can refer you to the WDC 'Playing Pitch and Outdoors Sports Facilities Overview Consultation' carried out a few years ago, findings as follows. 'Beccles has an existing football deficit of .5 mini-football pitch. Cricket existing deficit of 7 wickets. Rugby, existing deficit of .5 pitches and quality improvements required at College Meadow, particularly to resolve drainage issues which reduce capacity for games and practice (drainage issues which will not be resolved by building on). Hockey, existing deficit of 1 sand filled pitch resulting in hockey club travelling out of district to



use facilities. Tennis, improve access at Beccles Tennis Club'. All these being within your designated 'plot 72' and being owned by Beccles Town Council and under dispute with the Charity commission as being part of the Beccles Fenland Charity.

Furthermore with regards to the WDC 'Open Space Needs Assessment' carried out by Jack Green. Open space provision in the District. 'The poorest provision is in Kessingland with Beccles, Bungay, etc having less provision per person than the District average'. The Biodiversity sites in the Market Towns, shows 'Beccles to have sites of biodiversity value', one such site being that which The Waveney Local Plan is showing as 'plot 72'.

### **Terence White**

Whilst I can appreciate the use of the north section of this site to add recreational and sports facilities adjacent to those existing, even though access roads are already a problem, I feel to develop the balance of the site with housing would be detrimental to the well being of Beccles. The parcel of land along Lowestoft Road and leading over the marsh down to the common forms a natural break from the town and the urban area of Worlingham. It forms a natural 'lung' to the old town.

When viewed from the Lowestoft Road public footpath it can clearly be seen how wonderful this area is with views across the marsh, common, woodlands and on a clear day over as far as Aldeby. It is just as impressive as any other view from the towns boundaries such as from Ballygate over the countryside. This natural area is home to numerous breeds of wildlife and birds and in particular the barn owls. It is an area well worth preserving as part of the Waveney Valley Landscape.

Logistically there seems little scope for accommodating additional traffic that 130 houses would bring. The Common Lane, Grove Road, Marsh View areas are already over used and the access through Grove Road is a nightmare. Any access onto Lowestoft Road would cause even more congestion leading into the town. On Saturdays in particular cars back up from Ingate along Lowestoft Road waiting to get into town. This is multiplied 10 fold when the bypass is closed for works or accidents.

It seems to me there are much better areas to accommodate new housing around the town in particular to the south between London Road and the Ellough area where the new link road could be designed as an artery to take the additional traffic. The south and east areas have already had new developments tagged on to this part of Beccles so surely there must be more modern services and drainage facilities to these already that could be tapped into. No such services or drains exist at site 72.

Another area worth considering would be to the west side of London Road when heading out of town between the Cemetary and the Ringsfield turning ?

In summary, as a Beccles resident for over 60 years I feel turning site 72 from a natural area into urban sprawl would be detrimental to my home town.

Mr. T J White.

### **Philip Whyte**

I am against this proposal go the following reasons:

The roads to this area are not constructed for the extra traffic

The majority of this area is on floodplain & marshland which floods regularly and the extra infrastructure



would only magnify this and my property would undoubtedly suffer

The infrastructure predominantly sewage is not capable of taking the extra quantities

The area is a prime piece of the Waveney valley rich in wildlife, specifically owls.

I feel there are better alternative sites available

### **Beccles Society (Paul Fletcher)**

The following comments relate specifically to Plot 72 The Beccles Society notes that although Plot 72 has been entered into the document "Option for the new Local Plan" as a single parcel by a developer, the parcel actually comprises a combination of land areas having different owners.

The WDC document describes the plot as 'Land north of Lowestoft Road' and Beccles RUFC Common Lane (land north west and south east of Common Lane). The description is somewhat vague but for ease the society has looked at each as follows: -

#### 1. Land north of Lowestoft Road.

This land appears to be privately owned and currently forms a 'green barrier' between Beccles and Worlingham.

Following public consultation Waveney District Council published their 'Green Infrastructure Strategy' in 2015. This document described the land north of Lowestoft Road (between Marsh View and Park Drive) as follows: - Provides visual amenity and physical separation between the built up areas of Beccles and Worlingham. Vegetation in the south western part of the site screens existing development and helps integrate the area into the wider surroundings. Seek to protect the open character and setting of the area. Consider identifying the site as an 'open break' as part of a review of the Local Plan.

Permitting development on this site would therefore breach Waveney District Council's own strategy.

Furthermore, our understanding is that this land carries a status whereby it would only be developed if no other land is available. Upon completion, the Southern Relief Road will create a natural southern boundary to Beccles/Worlingham containing considerable land suitable for development as indicated by plots 8/9/81/82 on page 48 of the 'Options for the new Waveney Local Plan'.

The greater percentage of the land north of Lowestoft Road area is steeply sloped towards the river Waveney, as such it has a considerable effect on drainage/absorption of surface water run off from the built up areas of Worlingham, thus assisting in flood mitigation.

The developer (LandPro Ltd) has stated to Waveney District Council that a contract exists for the purchase of this land between themselves and the owner (i.e. plot 72). Consultation with Councillor Graham Elliott suggests that following his own investigation any such contract covers only that land described as 'north of Lowestoft Road', i.e. the land matching that included within the Green Infrastructure Strategy protection. The contract does not therefore apply to the entire area of plot 72.

Beccles RUFC Common Lane (land north west and south east of Common Lane).

This land lies within the boundaries of the Beccles Town Council Estate as surveyed and mapped in 1980 (revised 1983) by S C Bromley C.Eng,C.I.M.E (then Beccles Borough Engineer). Subsequent to that date legal advice accepted by Beccles Town Council has confirmed that this is the original Elizabeth I Beccles Charter land. As such it is held by Beccles Fenland Charity Trust on behalf of the inhabitants of Beccles with Beccles Town Council as sole trustee. Beccles Town Council has advised that they have no knowledge of, nor have they



authorised the inclusion of this land within the new Waveney Local Plan.

The Beccles Society strongly opposes the inclusion of plot 72 within any future local plans for the purposes of development. We believe that to lose this site to development will denigrate the area out of all proportion to the size of the plot. We also do not recognise that the area in question is required in order to meet expansion.

#### **Beccles Town Council (C Boyne)**

The area marked 72 should be kept as an open area between Beccles and Worlingham and a park should be created, as recommended in Waveney District Council's Green Infrastructure Strategy, Page 27, Recommendations 'The open countryside located adjacent to the north side of Lowestoft Road between Marsh View and Park Drive should be considered for protection as an open break as part of a future review of the Local Plan'.

#### **Historic England (Debbie Mack)**

Close to Beccles Conservation Area - potential impact upon Conservation Area and its setting

#### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
- ▶ 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane
- ▶ 102 - Land south of Sparrowhawk Road
- ▶ 13 - Fairview Farm, Norwich Road
- ▶ 30 - Land adjacent to Elms Lane

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging



works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

#### **Appendices - National Grid Assets**

Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)

#### **Personal (Jonathan Blankley)**

There is already a lack of sufficient space for all the existing sports clubs. Urgent consideration must be given to increasing the available space to allow the clubs to continue to grow just as the town is doing. Both local football clubs and the rugby club struggle to operate in their current confines, and a permanent solution needs to be found. There can be no consideration given to the loss of any of these existing facilities, and all future developments in the town should contribute to providing suitable additional facilities to enable them to provide a full range of activities to all those that wish to participate.

#### **Personal (Hilda Jackson)**

I think it would be a shame to infill this natural break between developed areas of Beccles and Worlingham.

On a practical issue, it would appear that much of the land toward the north is potentially wet and marshy.

The area is close to the Broads and development would have an unfavourable impact on the flora and fauna of the area.

#### **Private Resident (Roger Moore)**

- This land is a natural break between Beccles and Worlingham
- This land is floodplain
- Beccles is already service limited and cannot handle without significant investment in infrastructure any additional large number of people
- This is prime farm land and hunting grounds for birds (Owls and Kestrels)
- There are many more suitable locations for such a development
- Roads around this area are already full and the addition traffic will cause significant on going delays



### **SJLHS (david hall)**

1. access to the area is poor which will be made worse by more housing
- 2.The area floods annually especially at the avenue end of beef meadow .
- 3.what improvements are likely to be made to existing sports provision - none mentioned or highlighted.
- 4 parking at weekends especially sept - april is at times very difficult with footballers/rugby/golfers and dog walkers .

### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 72 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **Woodview Farm (Melvyn Searby)**

We have lived at Woodview Farm for the last 35 years and the proposed development would be adjacent to the southern boundary of our land. We are against the development for several reasons. We are concerned about the increased risk of flooding to our land and property as we are in a very low lying area and the run off from the concrete will flow straight downhill towards the Common where we live ..We have experienced severe flooding on the marshes at the rear of our home on several occasions in the past and witnessed children and their teachers being trapped inside the building known as the Guide Hut on Common Lane with deep water swirling around the building and preventing their escape. This shows there is already a problem, any new houses will just increase the flood risk. We are extremely concerned that yet another area of habitat, for wildlife will be lost as well as the lovely view across the fields, looking up towards Worlingham from Beccles Common.We have run a dog boarding kennels at our property since 1983 and have a license for 24 dogs.Our planning permission must have been granted in the knowledge that we are isolated and *have no neighbouring houses. Any new houses built on this site will hear dogs barking throughout the day.*Another reason for our objection is that the roads in this area are already congested with traffic and the one way system makes it very difficult to get out of Common Lane onto Grove Road and up the hill , then onto Lowestoft Road towards Beccles where the traffic is frequently gridlocked. With the new houses and increased number of vehicles this will be very difficult.

## **73 - Land north of Moores Cottages, Holton**

### **Halesworth Town Council (N Rees)**

Similarly, Sites 73 and 121,103, 148 are classified as Holton and HTC and Holton would need to look at this



together.

**Historic England (Debbie Mack)**

Proximity to Moat Farm house, grade II. Potential impact on setting of listed building.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 73; 121 Both these sites look to be outside the village envelope but there is already a 'local community' in this area and an innovative, environmentally designed scheme for local need could be considered.

**74 - Land north of Morton Peto Close, Somerleyton**

**Paul Douch**

Totally inappropriate & undesirable

**Julie Reynolds**

Totally inappropriate and unnecessary to crowd this site, density unacceptable.

**Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for housing development as it is a priceless piece of open land, development here would result in the whole Morton Peto Close area being very heavily developed and out of keeping with the rural nature of the village, the land is landscaped with trees and is within the conservation area.

**Historic England (Debbie Mack)**

Located within the Conservation Area and opposite Widows Cottage, grade II listed. Potential impact upon Conservation Area and setting of Listed Building.

**Somerleyton Estate (Lord Somerleyton)**

**Site Description and Development Potential**

11.1 Site Option 74 is located off The Street and is north of Morton Peto Close. The site is currently informal open space and a pedestrian footpath joins The Street with Station Road on its eastern boundary. A plan of the site is included in Appendix 9. The site is 0.28ha in size. According to Policy DM16 a density of 30dph would indicate a minimum of 8 (including an allowance for 2 affordable homes) dwellings on this part of the site. The site is referred to in the Issues and Options consultation document as being 0.24ha and this is incorrect.

11.2 Based on nearby residential density we consider the site is capable of accommodating at least 5 dwellings. The site is an irregular shape but this provides opportunities to orientate development to minimise amenity impacts on neighbouring properties and complement the urban form in this part of the village. This



site is submitted for housing. It can have direct access onto The Street as shown on the site plan. Development of this land could go hand in hand with other nearby potential submission sites. The loss of this informal amenity space could be more than compensated for with the provision of greater alternatives nearby – this is indicated on the site plan.

### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

11.3 The site sustainability appraisal (SSA) at Point 1 states “proposed loss of open space”. This is incorrect. Our submission to the Call for Sites consultation stated “Development of this land could go hand in hand with other nearby potential submission sites. The loss of this informal amenity space could be more than compensated for with the provision of greater alternatives nearby – this is indicated on the site plan”. The SSA at Point 1 also refers to “limited community facilities in the village”. This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised.

## **75 - Land north of Snakes Lane, The Street, Lound**

### **Mr A W Baker**

Lound is a quiet country village spoilt by cars exceeding the 30mph speed limit and with cars parked each side of the road it causes a bottleneck and as there is talk of building 12 houses opposite The Mardle (pond) where there is quite a lot of wildlife, often crossing the road, many getting run over by vehicles, this could destroy them with the extra traffic from the new build. The environment would be changed and the area will deteriorate making it completely different to as we know it.

### **Hilary Baker**

I don't think houses should be built on this site. This is outside the existing area of the village, and would be an extension of the village. The site is next to Snakes Lane, which is a well used bridleway and part of the Waveney Way. Houses in this location would be obtrusive and spoil the views you get of Lound as you approach the village along Snakes Lane.

### **Ms Francis Harvey and Mr Paul Church**

I feel that the two proposed building sites are unsuitable for housing development. Site 75 is only a small paddock used for years for grazing horses. Twelve houses would be rather a lot for such a small area of land. It is also prone to flooding badly in the winter and leads straight out onto the busy through road. It is also alongside the start of a bridleway for horses, which would then be spoilt with too many people using it from the newly built houses for walks etc. There are hardly any bridleways for horses around this area anyway, so to spoil one of the only ones round here would be such a shame.

### **Mr R Lubbock & Mrs J Cockram**

We like the village as it is. It is quiet and friendly and a great place to live. We have enough idiots who drive through at well above 30 and we also have enough residents that need to park on the road making speeding cars cause a problem for people.

To build the proposed amount on both sites will only increase this problem as the infrastructure will not be able to support another 200 plus regular vehicles. We will lose the fragile tranquillity we have at present. We



agree housing is needed, but this amount will cause problems on our very country roads.

### **Rita Flatt**

The smaller area i.e. the parcel of land twixt pub and Mardle House, owned by the Somerleyton Estate. This I believe is the only site highlighted by the Estate in the parish, but there are other sites i.e. the cowsheds running alongside the road further north which are in serious need of attention. Do these come under a different category?

This is a boggy site, subject to flooding at the corner nearest the lane, but has been a pasture for grazing horses certainly since the 1940s, when I have a photo of the late Captain Flatt's horse grazing thereon.

The Parish Council have obtained three preservation orders on the three oaks situate on the roadside fence.

The road is pretty narrow, with a sharp bend, subject to a 'slow' notice written on the road, to the north. Visibility and access difficult.

### **Audrey Grapes**

I first moved to Lound in 1988, attracted by its idyllic appearance – country pub, post office, village shop. Over time the street in Lound has become a short-cut for traffic from A143 – Bradwell / Gorleston to Oulton Broad / Lowestoft, and because of the winding nature of the road, difficult to negotiate. In spite of 30 mph limit drivers constantly exceed this – often on mobile phones!

Lots of the existing properties are terraced and obviously do not have car spaces. Both the shop and Post Office are gone. The re-opened public house has generated more traffic, weekends as many as 12 cars parked alongside the pond, nose-to-tail, and in front of my property.

To introduce more houses, more cars with no amenities, bad drainage, access – particularly from proposed site 75 – seem most inappropriate. Changes in climate has seen Jay Lane / Church Lane, Lound Main Street and Blacksmith's Loke regularly turned into virtual rivers in the last two weeks alone. Drains have been overwhelmed.

I hope that instead of just looking at plans on paper in offices, your committee will hold more site meetings to fully investigate the for and against such plans that you have before you, not just 'rubber stamp' them through.

Bear in mind: lack of schools / no doctors surgery, no amenities, minimal public transport, lack of adequate drainage.

### **Jane Harrison**

I do not think this site is suitable as a housing development area. The Street is already a very busy road through the village, there is already housing on both sides of the Street, and parked cars on both sides.

Cars speed through the village already, and at peak times it can be quite dangerous, with cars, buses and lorries trying to pass through. we also have a popular pub and cafe, with limited parking available at the pub, this often enhances the problem. The addition of extra houses, and therefore vehicles would add to the problem, and also create a potentially dangerous junction onto the Street from the housing area.

### **MR and Mrs RA and BC James**



This area is owned by Somerleyton Estates – so why should they plan to build in Lound.

**Bruce James**

I have enjoyed life at Lound for many years. I consider this area as my heritage and find worrying the proposals here by the New Waveney Local Plan.

At present the village area has about 70-80 dwellings on 9 acres of land. The proposed site 167 would use a further 17 acres of “prime agricultural” land to provide a further 138 dwellings.

Such a large development would effectively triple the amount we have now and I fear would prove the present infrastructure unable to cope.

Jay Lane and Church Lane, the main route into our village, are in a disgusting state of repair with pothole and flooding problems and should not be subjected to further traffic without substantial repairs.

Lound sewage struggles to pump 1 1/4 miles from Back Lane to Hopton on Sea thus burdening their capacity in Norfolk.

Until now Lound has managed to remain a neatly compact village but if such a large development is allowed, sprawling eastward into open countryside the village’s present charm and character would be lost forever.

The large site 167 extends onto low damp ground and thus is not ideal for building. There are drainage ditches along its northern and western sides which are essentially maintained to prevent the even lower Blacksmith’s Loke area from storm flood.

The smaller proposed site 75 is also low wet ground. I can remember a pond there next to the road, development here would likely create further drainage problems.

My steadfast belief is that prime agricultural land should be preserved to feed an ever increasing population whilst the poorer and brownfield used for housing.

I say both proposed sites 75 and 167 are therefore unsuitable for housing development.

**Harry Jarvis**

The two areas proposed for housing sites 75 and 167 are prone to flooding especially the areas around Blacksmiths Loke as these are the lowest points in the village. The land in this area is very close to the water table hence the pond (‘mardle’) which is fed from an underground spring.

**Jacob Kent**

This site seems a more appropriate for the expansion of the village.

**Jon Lovelock**

With the pub reopening the amount of traffic coming onto the main street has increased and with the addition of 12 houses this will only make it worse. The land is already very boggy around there and if it were to be concreted then it would cause even more problems to the drainage of the village. The village pond with the pub opposite is a perfect example of village life, it is not needed to put new houses opposite that, it will take



the view away. The extra noise created by the works and then the houses could also deter wildlife from settling there.

### **Brian and Patricia Mitchell**

Same answers as for 167 (The good things about living in Lound is the peace and tranquillity of an unspoilt Suffolk village, there are very few of these quaint little villages left, this is the reason we choose to retire here 16 years ago its outrageous to even think our little village could take 213 houses with the sewerage system and extra traffic, we have no facilities the school has been shut and also our post office / shop.)

If this project goes ahead it will set a precedence throughout the village and there will be many more applications including individual applications.

### **Kevin Morgan**

As already mentioned Lound is a small village which is part of the attraction for most who live here. I also suspect this is not the first time that property developers have tried to build in or around the village.

I would say the infrastructure of the village would not withstand the development of this kind, we have major flooding on certain roads / land around the village every year without fail.

The sewage system seems to also flood at times in Back Lane possibly overloaded? So I suspect this would not be able to sustain further development.

The village is surrounded by open countryside and employment mainly comes from agricultural or horticultural sector, so employment I would say will be very limited in this area.

So with next to nil opportunities for employment / no schools & facilities, any occupiers of any new homes would need to commute in order to find work etc. This would therefore increase the traffic flow on rural roads and lanes that surround the village by a considerable amount, they are barely adequate at peak times at present.

Further to the traffic issues I suspect any development on both sites will cause traffic problems for residents both entering and exiting the village during building so again increased traffic and disruption will be caused which is unacceptable to residents of the village.

It's difficult to see what positive effect such development proposals will have on the village. The feeling is that it will destroy rural nature of the village and the surrounding countryside and increased noise pollution and turn the village into an estate.

This development will not enhance the village in anyway the only enhancement will be to the developers bank account as they try to squeeze another few rabbit hutches on a plot of land while destroying another English village in the process.

### **Jennifer Ozinel**

This site is in a beautiful part of the village. Many visitors come to the duck pond and to walk up Snakes Lane. They all say how peaceful it is and how pleasant it is to be able to walk in the countryside with no cars. I would prefer Lound to stay as it is now, with just a few additional houses but not large new housing estates. Even a development of 12 houses as proposed for this site would alter the character of the village. A recent visitor from London commented on how clean the air is and how quiet it is with the loudest noise being



the sound of birdsong. We want to keep it that way.

#### **moiraselvage**

This unique and picturesque village of Lound with a round tower church and mardle, would not be suitable for a site building 148 houses, or indeed for the plot for 14 houses.

The site by the Village Maid would not only destroy the tranquil beauty of the village, but be a most inappropriate site along the main street with its traffic possibly causing congestion and danger.

The aesthetic value of Lound's pastoral views and the enjoyment it affords villagers and the many visitors will be an enormous loss. The country walks, appreciation of flora and fauna, doggie walking, horse riding, bird watching will indeed affect the uniqueness of this historic village if building on such a gigantic scale is allowed.

Lound could possibly sustain the building of a house here or there, but THINK AGAIN in 20/30 years time what it might be like with concrete jungle tearing apart a jewel of a village.

Preservation not destruction should be the right route to contemplate.

#### **Louis Smith**

This site is not suitable for development as it is in a very prominent position in the heart of a small rural village. New houses, particularly the number suggested, would be obtrusive and would not fit into the existing character of the village. The site is next to the village pond (The Mardle) where many people come to feed the ducks and enjoy the tranquil countryside. Snakes Lane is currently a peaceful bridleway (part of the Waveney Way), and building on this site would spoil the view as you approach Lound along this path.

Lound is a very small village and even a modest scheme as suggested would increase the number of dwellings by around 8% - this is likely to change the character of the village.

This site has a surface water drainage problem - heavy rainfall causes water to run off the fields from West to East and collect along the eastern boundary of this site. Because of this the site is no longer used to grow crops, but is used as a horse paddock. I know this will not prevent building, but it will add to costs.

There are no shops, schools, or jobs in Lound, and only a limited bus service. Everything is a car journey away, so building new houses in Lound is not sustainable development.

Lound is suitable for limited infill development that fits into the existing style of the village. This suggested development goes beyond that.

There must surely be more appropriate sites for development in Waveney that would not spoil open country views and alter the character of the existing settlement.

#### **Mr & Mrs Tooke**

The village should remain a village and not double or more in size. The green field sites should remain green field and provide soak aware areas not used for housing.

Housing will cause light pollution with street lighting. The amount of traffic during and after building will increase considerably causing an increase in air pollution, there is plenty of traffic already. Wildlife will suffer which includes bats as well as owls, ducks and cuckoos and many other species of birds. The only work in the area is agriculture and existing public house and café. Empty shops and brown field sites should be used for new housing.

#### **Mr A Woods**



It's a pity because I love living in Lound and we know there is need for more houses. But 600 more people to come here no more village. Is this also to do with work in north sea. I hope there are less houses built. But I think it is to do with money like always.

#### **Historic England (Debbie Mack)**

Mardle House grade II listed building immediately to the north. Potential impact upon setting of Listed Building.

#### **Lound Parish Council (John Burford)**

Lound Parish Council had an extraordinary Parish Council meeting on 3rd May to discuss our reaction to the Waveney Local Plan consultation. This was attended by Parish Councillors and 30 members of the public, a very large turnout for our small village.

Everyone at the meeting was horrified by the two potential development sites which were put forward (site numbers 75 and 167), and the number of houses being suggested which would double the size of the village.

A lengthy and fruitful discussion took place where the members of the public freely shared their views. There was wholesale opposition to any large housing development in the village. Everyone agreed that any development in the village should be small in scale and within the existing character and built area of the village. The pertinent points of opposition in relation to the suggested development sites were :

- Inappropriate size
- Change the nature of the village
- The need to preserve nature and the environment
- Take away the possibility of church yard extension
- Owl and Bat habitat, both of which are protected species
- Flooding will occur to existing properties if building takes place on what is 'a flood plain.'

#### **n/a (Judith Hobbs)**

It might be reasonable to 'infill' on this plot, preferably affordable/shared ownership. It would be acceptable to allow some small development and the village is very short of this type of property, a situation made worse by several cottages becoming holiday lets.

However, this field is within the catchment of The Mardle (the village pond), and is very boggy at the eastern end, and frequently under water for weeks at a time when the water table is high.

I think that no more than say, six houses on this site, leaving the eastern end still as open space/screening from the road. Six new houses, rather than the twelve projected, is really enough for a village of this size, in any context. (see also my comments on Plot No. 167)

There is also an issue of safety; even with only six houses, there are likely to be a dozen or so additional vehicles turning in and out of what is a tricky access, with poor sight lines, adjacent to the pub and its carpark, and to The Mardle, where there are often parked cars and visitors wandering about.

#### **Somerleyton Estate (Lord Somerleyton)**

##### **1.0 Introduction**



1.1 Waveney District Council is responsible for setting the amount of housing and employment land is required in Waveney in the future. They are in the early stages of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the period up to 2036.

1.2 Evolution Town Planning have been instructed by the Somerleyton Estate to make representations to this public consultation. This is an early stage in the process whereby the Council allocates sites for housing and employment development.

1.3 This report includes commentary on the Site Option 75 in Lound. Our responses to the consultation Questions have been submitted under separate cover on the District Council's proforma and a copy is provided here in Appendix 1.

1.4 Evolution Town Planning (ETP) are experienced in promoting small rural sites either through development plan representations or planning applications. We also have site assessment experience from working in Council planning departments. As a practice we have 30 years of combined professional experience in this type of work.

1.5 These representations include a potential housing site in Lound. The site is north of Snakes Lane and adjacent to the Village Maid Public House and opposite the village pond. These representations build on the information submitted to the Call for Sites consultation.

1.6 This site has been assessed and we consider it to remain suitable, available, achievable and viable taking into account relevant policy requirements and obligations.

1.7 The identification of this site results from a village-wide walk over and assessment of the development potential. The plan in Appendix 2 identifies the site, its location in the village and its surroundings.

1.8 According to evidence in the Waveney Village Profiles and from our tour of the village Lound benefits from a number of local facilities and services which contribute to its sustainability.

1.9 The Estate is open to the tenure and mix of housing which could be delivered in the village. Much depends on the final site selection and local needs but could include bungalows, affordable housing and smaller homes for first time buyers.

1.10 It remains unclear how the District Council will be responding to recent Government guidance on boosting housing supply and recognising the benefits of rural housing. Therefore the recognition of the village's sustainability credentials is something we will be pursuing through the local plan review.

1.11 In the meantime we invite the District Council to consider the information in this report, the merits of the site to enable the village of Lound it to 'play its role in delivering sustainable development' 1 in Waveney.

## **2.0 Planning Policy**

2.1 The Waveney Core Strategy dated 2009 was an early respondent to the 2004 Planning Act in respect of the adoption of the Local Development Framework in comparison to other Council's in Suffolk.

2.2 While direct comparisons are difficult it is apparent that other District Council's direct development to smaller settlements than do Waveney. For example Suffolk Coastal (2013) identify local service centres and 'other' villages, St Edmundsbury (2014) identify local service centres and infill villages and Babergh (2014) identify hinterland villages.

2.3 The Waveney Core Strategy predates the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG) and is becoming increasingly out of step with national planning policy imperatives and recent Government requirements for local plans to be in place by early 2017.

2.4 For example the Framework requires local planning authorities "to boost significantly the supply of



housing”.

2.5 Also in comparison to other Core Strategies in Suffolk the Waveney LDF gives relatively little attention to the contribution that villages can play in contributing to rural housing supply. A large number of villages, often with access to local services, are relegated to being classified as being in the open countryside where a general safeguarding approach is advocated in the Waveney Core Strategy.

2.6 The PPG provides guidance on rural housing and states (our emphasis in bold):

Rural Housing How should local authorities support sustainable rural communities? Paragraph: 001 Reference ID: 50-001-20140306

It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and **the role of housing in supporting the broader sustainability of villages and smaller settlements**. This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities.**

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, **all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided** unless their use can be supported by robust evidence.

The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

2.7 The Waveney New Local Plan is at an early stage and it is not yet clear how Waveney District Council will be responding to these national policy imperatives and how this will be reflected in revisions to the settlement hierarchy in the spatial strategy.

2.8 It is not known whether the District Council will refresh their settlement hierarchy and direct a proportionate amount of housing to all sustainable settlements including villages previously overlooked or whether they will abandon the ‘blanket approach’ of settlement boundaries and allow development where it can be shown to be sustainable and well related to the built form. Much will depend on the responses the Council receives to the Issues and Options consultation.

2.9 In terms of policy guidance on the site assessments below we have had regard to policies of the adopted Core Strategy (2009) , the CIL Charging Schedule and the Development Management document (2011) ; specifically policies DM16 Housing Density, DM17 Housing Type and Mix and DM18

Affordable Housing.

2.10 The Council acknowledges the need to review these policies as part of the new Local Plan as they were based on former national planning policy priorities and predate the Framework and Planning Practice Guidance.

2.11 These local policy documents are adopted and, as the Council acknowledges, form a useful baseline now and we have had regard to them in the same manner.

2.12 The National Planning Policy Framework (The Framework) seeks to deliver sustainable development. We consider that the assessment below shows that the residential development of the site we have submitted will



meet the social, environmental and economic tests for sustainable development.

### 3.0 The Village of Lound

#### Geography

3.1 Lound is located in the north of Waveney District and is 6 miles from the large town of Lowestoft, 8 miles from Great Yarmouth and 2 miles from the large village of Blundeston.

3.2 Lound has a population of 359 people and 154 dwellings<sup>2</sup>. The demographic displays a near even gender distribution and an average age slightly higher than the average for Suffolk and the East of England<sup>3</sup>.

#### Key Facilities

3.3 The Waveney District Council Village Profile (Appendix 3) for Lound lists the key facilities which contribute to the sustainability of the village.

3.4 The nearby villages of Blundeston and Somerleyton have additional key facilities accessible to Lound including a rail station, post office, food shop and primary schools.

3.5 The key facilities in Lound include a public house and meeting place. There is also a café and bakery in the former Post Office as shown on the plan in Appendix 2.

### 4.0 Site Option 75 Land North of the Snakes Lane, Lound

#### Site Description and Development Potential

4.1 The site is located in the north of the village and adjacent to the village pub and opposite the duck pond. A plan of the site is included in Appendix 2.

4.2 The site is 0.41ha in size and is well related to the built form of the village. According to Policy DM16 a density of 30dph would indicate a minimum of 12 dwellings on this site. **The density of nearby development suggests this would be a maximum figure including up to 4 affordable homes arranged in a manner sympathetic to the form and position of the site within the village.**

4.3 The site is a regular square shape and is generally flat and level and access would either be via Snake's Lane or off The Street.

4.4 To the north of the site is Mardle House and Mardle Farm. Mardle House is 50m north and is a Grade 2 listed building visually separated from the site by substantial boundary vegetation

To the west and southwest is agricultural land. To the east is the village duck pond and residential land beyond. To the south is the village pub and dwellings on The Street.

4.5 The site has a significant frontage onto The Street and an existing access with good visibility in each direction from Snake's Lane.

#### Response to Issues and Options Consultation and Site Sustainability Appraisal

4.6 The site sustainability appraisal (SSA) at Point 11 states that "use of grade 1 greenfield site" and it is scored --. We disagree with this assessment. The site is small and as can be seen from historic aerial photographs has not been actively farmed since at least 1999:

4.7 We suggest the effect here should be raised to 0 (neutral) effect to reflect circumstances on the ground.



## 5.0 Conclusion

5.1 This report promotes a site in Lound in response to the new Local Plan Issues and Options consultation.

5.2 Lound is a part of a group of villages that benefit from a range of facilities where development in one can support services and facilities in another.

5.3 There is a pressing need to deliver a significant boost in housing supply nationally and Planning Practice Guidance makes it clear that rural areas can play their part.

5.4 We have reviewed national and local planning policy and guidance and have visited the site and toured the area. We have submitted this site because it meets the consultation threshold and the criteria set out in the Strategic Housing and Economic Land Availability Assessment consultation methodology (Oct 2015).

5.5 Our site assessment shows that the site is currently suitable, available and achievable and that an allocation for development would meet the economic, social and environmental principle of sustainable development in Waveney.

5.6 The site has the ability to provide for a mix of housing types to meet the needs set out in the Waveney Housing Market Assessment and evidenced local need.

Site map and Lound village profile attached.

## 76 - Land north of Sparrowhawk Road, Holton

### Tony L

Ideal site for offices or industry - something we need in Halesworth

### Environment Agency (-)

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 1

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### Halesworth Town Council (N Rees)

Sites 102 of (3.04) hectares is potentially a good site for industrial use and has good access. Both site 102 and site 76, (27.72 hectares,) are on the borders of Halesworth / Holton and both Councils would need to look jointly at any development and the implications for services and infrastructure.

### Suffolk Wildlife Trust (James Meyer)

Based on aerial photographs, sites 14; 76; 86; and 160 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated



that this would not result in an adverse impact on any existing ecological value that they have.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This seems to be a good site for industrial use with good road access onto Sparrowhawk Road. It would be a natural contender for a household recycling centre, close to the proposed industrial site<sup>102</sup>.

### **77 - Land off Benacre Road (Site 1), Ellough**

#### **Beccles Town Council (C Boyne)**

Beccles Town Council would back sites 61, 77 and 78 for future employment bearing in mind the access provision mentioned above and suitable power supplies which are not available at the moment.

[The road infrastructure in the area is very poor and not fit for purpose, the B1127 being a prime example as it is little more than a country lane, as is Ellough Road and most of the others. There is inadequate pedestrian and cycle access to the existing and proposed employment areas at Ellough and no bus service at all.]

#### **Suffolk County Council (James Cutting)**

The county council welcomes the reference to the Beccles South Relief Road and encourages the district authority to mark the route on the Beccles site map. Subject to any further assessments, the proposed level of growth around Beccles is generally acceptable with the exception of the following sites 124, 50, 71, and 77 since these are all further out from the town centre and less likely to encourage sustainable travel choices.

### **78 - Land off Benacre Road (Site 2), Ellough**

#### **Beccles Town Council (C Boyne)**

Beccles Town Council would back sites 61, 77 and 78 for future employment bearing in mind the access provision mentioned above and suitable power supplies which are not available at the moment.

[The road infrastructure in the area is very poor and not fit for purpose, the B1127 being a prime example as it is little more than a country lane, as is Ellough Road and most of the others. There is inadequate pedestrian and cycle access to the existing and proposed employment areas at Ellough and no bus service at all.]

### **79 - Land off Blocka Road, Ashby Dell, Ashby**

#### **Paul Douch**

Anything more than a very small development of 2-4 houses does not seem desirable in this wooded location with poor access & infrastructure



### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for housing development because it would be unsustainable as there are no facilities or supporting infrastructure and it would overwhelm the existing widely-spaced housing in Ashby Dell.

### **Historic England (Debbie Mack)**

6, 7, 8 and 9 The Dell to south west - all grade II Listed Buildings. Potential impact upon setting of listed buildings.

### **Somerleyton Estate (Lord Somerleyton)**

#### **1.0 Introduction**

1.1 Waveney District Council is responsible for setting the amount of housing and employment land is required in Waveney in the future. They are in the early stages of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the period up to 2036.

1.2 Evolution Town Planning have been instructed by the Somerleyton Estate to make representations to this public consultation. This is an early stage in the process whereby the Council allocates sites for housing and employment development.

1.3 This report includes commentary on the Site Option 79 in Ashby Dell. Our responses to the consultation Questions have been submitted under separate cover on the District Council's proforma and a copy is provided here in Appendix 1.

1.4 Evolution Town Planning (ETP) are experienced in promoting rural sites either through development plan representations or planning applications. We also have site assessment experience from working in Council planning departments. As a practice we have 30 years of combined professional experience in this type of work.

1.5 These representations include a potential housing site in Ashby Dell. The site is north of Blocka Road and adjacent to Ashby Hall Farm. These representations build on the information submitted to the Call for Sites consultation.

1.6 This site has been assessed and we consider it remains suitable, available, achievable and viable taking into account relevant policy requirements and obligations.

1.7 The plan in Appendix 2 identifies the site, its location and its surroundings.

1.8 According to evidence in the Waveney Village Profiles and from our tour of the area Ashby Dell benefits from being within short travel time of a number of local facilities and services in nearby villages which contribute to its sustainability.

1.9 The Estate is open to the tenure and mix of housing which could be delivered at this site. Much depends on the final site selection and local needs but could include bungalows, affordable housing and smaller homes for first time buyers.

1.10 It remains unclear how the District Council will be responding to recent Government guidance on boosting housing supply and recognising the benefits of rural housing. Therefore the recognition of the village's sustainability credentials is something we will be pursuing through the local plan review.

1.11 In the meantime we invite the District Council to consider the information in this report, the merits of the



site to enable Ashby Dell it to 'play its role in delivering sustainable development' 1 in Waveney.

## 2.0 Planning Policy

2.1 The Waveney Core Strategy dated 2009 was an early respondent to the 2004 Planning Act in respect of the adoption of the Local Development Framework in comparison to other Council's in Suffolk.

2.2 While direct comparisons are difficult it is apparent that other District Council's direct development to smaller settlements than do Waveney. For example Suffolk Coastal (2013) identify local service centres and 'other' villages, St Edmundsbury (2014) identify local service centres and infill villages and Babergh (2014) identify hinterland villages .

2.3 The Waveney Core Strategy predates the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG) and is becoming increasingly out of step with national planning policy imperatives and recent Government requirements for local plans to be in place by early 2017.

2.4 For example the Framework requires local planning authorities "to boost significantly the supply of housing".

2.5 Also in comparison to other Core Strategies in Suffolk the Waveney LDF gives relatively little attention to the contribution that villages can play in contributing to rural housing supply. A large number of villages, often with access to local services, are relegated to being classified as being in the open countryside where a general safeguarding approach is advocated in the Waveney Core Strategy.

2.6 The PPG provides guidance on rural housing and states (our emphasis in bold):

*Rural Housing How should local authorities support sustainable rural communities?*

*Paragraph: 001 Reference ID: 50-001-20140306*

*It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements . This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.*

*A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities.***

*Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, **all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.***

*The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.*

2.7 The Waveney New Local Plan is at an early stage and it is not yet clear how Waveney District Council will be responding to these national policy imperatives and how this will be reflected in revisions to the settlement hierarchy in the spatial strategy.

2.8 It is not known whether the District Council will refresh their settlement hierarchy and direct a proportionate amount of housing to all settlements including villages previously overlooked or whether they



will abandon the 'blanket approach' of settlement boundaries and allow development where it can be shown to be sustainable and well related to the built form. Much will depend on the responses the Council receives to the Issues and Options consultation.

2.9 In terms of policy guidance on the site assessments below we have had regard to policies of the adopted Core Strategy (2009), the CIL Charging Schedule and the Development Management document (2011); specifically policies DM16 Housing Density, DM17 Housing Type and Mix and DM18 Affordable Housing.

2.10 The Council acknowledges the need to review these policies as part of the new Local Plan as they were based on former national planning policy priorities and predate the Framework and Planning Practice Guidance.

2.11 These local policy documents are adopted and, as the Council acknowledges, form a useful baseline now and we have had regard to them in the same manner.

2.12 The National Planning Policy Framework (The Framework) seeks to deliver sustainable development. We consider that the assessment below shows that the residential development of the site we have submitted will meet the social, environmental and economic tests for sustainable development.

### 3.0 Ashby Dell

#### Geography

3.1 Ashby Dell is located in the north of Waveney District and is 7.4 miles from the large town of Lowestoft, 7.5 miles from Great Yarmouth, 2 miles from Somerleyton, 1.9 miles to Lound and 3.2 miles from the large village of Blundeston.

3.2 Ashby Dell, along with Somerleyton and Herringfleet, is part of the parish of Somerleyton which has a population of 427 people and 154 dwellings<sup>2</sup>. The demographic displays a near even gender distribution and an average age slightly higher than the average for Suffolk and the East of England<sup>3</sup>.

#### Key Facilities

3.3 The Waveney District Council Village Profile (Appendix 3) for Ashby (with Somerleyton and Herringfleet) lists the key facilities which contribute to the sustainability of the area.

3.4 The nearby villages of Somerleyton, Blundeston and Lound have additional key facilities accessible to Ashby Dell including a rail station, post office, food shop and primary schools.

### 4.0 Site Option 79 Land North of the Blocka Road, Ashby Dell

#### Site Description and Development Potential

4.1 The site is located north of Blocka Road in Ashby Dell. It is adjacent to dwellings associated with the Somerleyton Estate, Ashby Rectory, The Lodge and Ashby Hall Farm. A plan of the site is included in Appendix 2.

4.2 The site is 0.5ha in size and is well related to existing dwellings within the hamlet. According to Policy DM16 a density of 30dph would indicate a minimum of 15 dwellings on this site. **The density of nearby development suggests a figure of 5 or 6 dwellings would be appropriate including up to 2 affordable homes arranged in a manner sympathetic to the form and position of the site.**

4.3 To the south of the site are 7 Estate dwellings all accessed off the same driveway. No.s 6, 7, 8 and 9 The Dell are Grade 2 listed buildings. To the west and north is agricultural land.



## 5.0 Conclusion

5.1 This report promotes a site in Ashby Dell in response to the new Local Plan Issues and Options consultation.

5.2 Ashby Dell is part of a group of villages that benefit from a range of facilities where development in one can support services and facilities in another.

5.3 There is a pressing need to deliver a significant boost in housing supply nationally and Planning Practice Guidance makes it clear that rural areas can play their part.

5.4 We have reviewed national and local planning policy and guidance and have visited the site and toured the area. We have submitted this site because it meets the consultation threshold and the criteria set out in the Strategic Housing and Economic Land Availability Assessment consultation methodology (Oct 2015).

5.5 Our site assessment shows that the site remains suitable, available and achievable and that an allocation for development would meet the economic, social and environmental principle of sustainable development in Waveney.

5.6 The site has the ability to provide for a mix of housing types to meet the needs set out in the Waveney Housing Market Assessment and evidenced local need.

Location map and Village profile attached.

## **80 - Land off Church Lane, Carlton Colville**

### **Andrew Deal**

A development on this site would cause further problems relating to flooding, highway congestion/ parking & put strain on the local school.

A small area in the eastern site section for Church parking would however relieve local parking congestion.

### **Michael Leedham**

This site has been proposed on numerous occasions before and has always been turned down for very good reasons.

My serious objection to this site is as follows:

The site is surrounded by dangerous blind corners, from Carlton Manor there is a blind left hand bend, another blind corner at the church which has regular accidents. There is also the access road from Carlton Hall Residential Home yet another hazard.

Roads from Waters Avenue and Beaumont Road and further on another dangerous junction at the access to Mutfordwood Lane again a very narrow road.

I believe this development would cause traffic chaos apart from which the level from this site is such that any housing would cut off light and privacy for all of the homes along the stretch of road opposite. If the site is developed there would be a huge flooding problem as the water would run downhill from Waters Ave and



Beaumont Road towards The Mardle where there have already been serious flooding problems.

Another major objection to this piece of land being developed is that the relatively small number of houses will do nothing significant to solve the housing problem but will effectively surround Carlton Colville Village from all sides by development and block views of the beautiful 14th Century St Peters Church which is the first view many people get from Carlton Colville as they come in from the west.

If this development is allowed I believe it will give the green light for development through to Mutfordwood and beyond effectively joining Hulver and beyond.

I consider this proposal to be very seriously flawed.

If Carlton Colville old village needs any further development I would suggest that the old school which is currently much underused could be sympathetically developed for first time buyers and or retirement bungalows without having any major impact on the character of the old village as all major services i.e gas, water and electricity are already in place.

There are buzzards nesting in Mutford Wood together with owls and sparrow hawks in the trees near to Carlton Manor and Carlton Hall and the development of this land would seriously diminish their prospects for survival.

Finally if the owner of the land would consider donating a strip of the field free of charge to the church for parking without the 60 houses this would be the best outcome for the church and the village.

#### **Badger Building (Edward Gilder)**

We have already placed before you the virtues of each of the sites which we have submitted and make the point that, in the event of allocation, we are in a position to bring each forward for development within the early years of the plan.

Each is well located in relation to existing built development and can proceed without reliance on others.

Site 80 at Carlton Colville provides an opportunity to draw traffic away from the tight corner by the church and provide a more direct link from Chapel Road to Church Lane. It rounds off the extent of development of Carlton Colville, to the west and does not extend in to open countryside.

#### **Carlton Colville Town Council (Christine Sayer)**

Area 80 open land should be preserved because it provides a green corridor and views of the church. It is also one of the highest points in Carlton Colville and housing there would have a detrimental affect on drains and sewers. The church also needs a parking area and extra burial area.

#### **Historic England (Debbie Mack)**

Church of St Peter, grade II\* to north east. Potential impact upon setting of high grade listed building.

#### **NorCas**

Far too much development in the area already. Any more will add to the overstretched services and communications



## **81 - Land off Darby Road, Chenery's Farm, Beccles / Weston**

### **Susan Doherty**

Over development, flooding, the main storm drain for Beccles runs through this area, this is already too small to take water in heavy rain, Anglian Water need to build up this drain all the way to St. Anne's Road, Kilbrack, Gosford Road and beyond, before any more pressure is put on this already fragile infrastructure, which was last heightened as long ago as the 1960s!

### **Nicky Elliott**

I think this site, along with sites 8 and 9, provide the best location for the required development in Beccles, provided that access for motor vehicles is made from the Southern Relief road only. Vehicles will be able to enter and leave the development from the east and west on the Southern Relief Road, and then north and south on A roads. Other residential roads adjacent to these lands (Darby Road, Nicholson Drive and Cucumber Lane) should provide cycle and pedestrian access only. If the three sites were developed together, the developer could be required to provide some infrastructure such as a community centre, shops, school, health centre, pub, etc.

### **Charlotte Sanderson**

493 houses - the scale of this development is far too big for Beccles. Where will the occupants work? Many will rely on their cars this will add to congestion, parking problems and pollution in the area. Developments of this scale will also alter the character of Beccles.

### **Rosemary Shaw**

The most suitable sites for development are those which would be served by the new road to the south, namely site numbers 8, 9, 81, 82 and 107 - and this would also apply to sites like number 124. It would make sense if these sites (8, 9, 81, 82, 107) had good cycle paths and walkways into the centre of Beccles even though they would primarily be served by the new southern relief/distributor road for motor vehicles.

### **Rachael Staniul**

The proposed 493 houses is far too many. Any more development in this area will put more pressure on the main rain water culvert, which runs from M & H Plastics, to Common Lane and beyond. This culvert passes behind my property in Kilbrack and is already unfit for purpose, and to put extra stress on it could result in properties being flooded.

Anglian Water had indicated a few years ago that due to extra impact during heavy rain, the culvert would need to be heightened. No such work has been undertaken, and residents, such as myself, whose properties are in close proximity to this are very worried what effect the pressure of so many new houses would have.

If this proposal is given permission for almost 500 houses, would the heightening work on the rainwater culvert be carried out as a matter of urgency?

### **Beccles Society (Paul Fletcher)**



The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

## **82 - Land off Ellough Road, Worlingham / Beccles**

### **JOHN CAKEBREAD**

I attended the exhibition at Beccles Public Hall. I have 2 main real concerns:

- 1 Water drainage
- 2 Privacy

#### Water drainage

My property falls below the elevation of the proposed development. In heavy rain my garden is often waterlogged. I put this to Mark Mann, Planning Director Larkfleet Homes, who was in charge at the exhibition, that 975 houses with tarmac roads and pavements on higher ground, surely can only worsen matters. My property is in the firing line. He assured me that drainage would be improved with water diverted to 2 ponds and my garden would in future, not be subject to excess water or in extreme weather conditions, flooding. When I asked if he would offer a written guarantee, he replied 'no, of course not.' This is pure meaningless rhetoric. Words are cheap. Should I experience later flooding problems, my only recourse is to Insurance policies. Anyone else would not care less in the slightest. Mr Mann said his office had been in consultation with Waveney District Council, but he did not know who the Council Point of Contact was. I gave him my number and he said he would 'most certainly' find out and phone me. One week on, I have heard nothing.

#### Privacy

My property is a single storey dwelling. When I spoke with the Waveney Planning Officer, he mentioned that privacy is a material consideration and planning allows for a 35 metre separation from a primary window. Mr Mann said that his masterplan would cater for 21 metre separation and a 2 storey building could well be built on the back of my garden. I feel this is totally unacceptable. DM02 Principles state that developments should include a mix of small and large houses with bungalows. Because my property is below the proposed development, a new 2 storey building would seriously compromise my privacy. Soft landscaping with trees was brought up with Mr Mann. He did not have details of how many trees, what type or whether the trees would be in the gardens or in a separate strip maintained by the Council. It was not included in the masterplan.

I am fully aware of the possibility of community edges being extended. Yet it should be planned with respect and consideration to the existing environment. District HMA suggests that new developments must be 'sensitive to its location.' As Cllr Colin Law has stated in a recent publication delivered to all Council residents,



“the best way to do this (improve the quality of life for the people living and working in Waveney) ... by giving our communities the power to make important decisions for themselves.”

Whether the locality has the jobs or infrastructure to support such a large housing development, is another matter. My immediate concerns of water drainage and privacy were not at all convincingly answered by Larkfleet Homes. With respect, I trust that there are sufficient, adequate checks and monitoring to be applied in the planning process.

#### **Susan Doherty**

Over development – the infrastructure is not there, we already struggle for a doctor, dentist etc, there is no use building any health centre etc. if there is no health specialist. Drainage = no use putting new drainage onto old, as well already have problems in this area, of water backing up and spilling over into garden, also sewerage. Loss of habitat for wildlife already suffering from developers and over development.

#### **Robert Gill**

If building has to take place round the Beccles/Worlingham area, we consider this site should be included, as it has good access and would permit a significant number of homes to be built.

#### **Paul Gurbutt**

1. How do you protect the historic heart of Beccles from the increased traffic. All the developments are south of Worlingham and all the supermarkets are to the north (\*) traffic blocking Beccles. The secondary schools locations (\*) that cross Beccles traffic is inevitable. Larkfleet (area 82) gave no assurance of any solution to the traffic problem.
2. How do you plan for extra infrastructure? I have heard from Anglian Water that the sewage treatment works is already over stretched, without 100's more houses.

#### **andy house**

This proposed development is too large for the village of Worlingham and would strain the resources in Beccles in respect of health care. I suggest that this space is better used for a commercial activity such as a premier inn and associated pub. this would meet the local demand for overnight accommodation, provide much needed service jobs and give the village a local pub again.

#### **Jay**

##### **Traffic**

Elloough road is currently very busy at peak times – this will only get worse with 1,000+ cars added at these times. As there are two schools located on, or just off, this road this could become quite dangerous at peak hours.

##### **Local Facilities**

Schools, Doctors and Dentists would have to be able to cope with approx 3,000+ extra people. As these facilities are all currently stretched, can they cope with this increase and are finances available for this extra



demand.

### **Flooding/Water**

Once housing is built any excess water will run downhill along Ellough Road will be likely to pool at the junction with Hillside avenue and increase the chance of flooding to the properties there.

### **Proposed Public Facilities**

A school, medical centre & sports pitches have been suggested by the developers but these would all be in fairly close proximity to the industrial estate from where chemical fumes etc can travel across.

### **Employment**

Large increase in population but no prospects of commensurate extra local employment. Will Beccles become just a dormitory for Norwich ?

### **Graham Jenkins**

The Developer has proposed to build 975 houses on this site.

I want to voice my objection to this proposal on the grounds that such a project will swamp the local facilities.

Currently the small market town of Beccles and Worlingham village is struggling to cope with existing population.

The infrastructure needs a complete overhaul before plot 82 is agreed as the Developer has not guaranteed the provision of extra schools, doctors surgeries, dentists and sewerage disposal facilities. Also there is currently problems relating to traffic congestion in Beccles and parking at Tesco supermarket.

Finally I am not against the building of extra houses in the area shown on the map but there is a need to moderate the demands of land owners and developers so that the quality of life for existing residents and newcomers is not put in jeopardy.

### **Paul Leman**

This site along with any other sites being being adjacent to the new Beccles southern bypass would seem the most suitable. Provided full facilities including medical, schooling etc. are part of the development plan. Better still, a new settlement possibly closer to Lowestoft & the A12 would be better than adding congestion & pressure on services to existing towns / areas.

### **Mr McGregor**

This site seems almost too good to fit in with the growth plan. Once the relief road is in place the site would have direct car access onto it.

Also construction vehicles could use it for access with virtually zero impact on the town.



The site offers the space for the significant amount of housing required in the plan.

As a new development it would have full infrastructure in place such as schools and medical centre and recreation thus having a minimal impact on existing.

There will be easy access to the town via existing roads to the north of the site for pedestrians and cycles

The site is currently of no great consequence to Beccles therefore having little environmental or visual impact. In fact if landscaped and modelled well it would be a boon to the town.

#### **Marya Parker**

Collectively, the number of sites and indicative house numbers on the south side of Beccles amounts to some 3,500 homes - a sizeable settlement. There needs to be accompanying provision of additional green space, formal and informal, health services, school and a community centre or hall before any sites are developed, where this would not be a requirement for any one site piecemeal development would result in an unsupportable burden on existing facilities. The increased traffic along London Road and Hungate - especially as there is no south western link to the A146, would also be unacceptable. The Town Centre would become a very unattractive place for shoppers and visitors and would require significant additional town centre parking.

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#### **Charlotte Sanderson**

Totally out of scale for a rural town, where will the occupants of 950 new houses work? This will substantially increase pressure on local roads, water and wildlife resources. Pollution will increase for all of the surrounding area.

#### **Jill Sharp**

Site No.82 is NOT suitable to build on as 950 houses takes up a lot of clay land off this site. The clay absorbs the rainfall and prevents flooding to other surrounding areas.

1. V.C.Cooke re-cycling depot creates air pollution (Worlingham Wiff) over this land and is a Health Hazard to house residents, as accumulates and then is contained within the housing properties. This Air Pollution is detrimental to bronchial sufferers of the young and elderly. (eg Asmathics).
2. V.C Cooke re-cycling depot creates, noise pollution and is a nuisance for the residents at the top and half way up Bluebell Way Now!!!. The residents of the houses built on that site will suffer more intolerable sound of the re-cycling machinery. This is not conducive to the mental wellbeing of residents, and when the "Relief road" is built this will increase the noise pollution. This would not respect the duty of care for residents.
3. The amount of houses to be built is extreme and the financial infrastructure of Beccles and Worlingham would collapse. The medical Centre is already struggling as confirmed by staff there. The road system is already congested and the extra cost for WDC would be expensive and use the funds up that could be used for other house developments less expensive.
4. Anglia Water sewerage. System is already over load.!!2006-2007 mention could cope with only another 600



dwellings.

5. This site was turned down last time as greenfield and not to WDC strategy of future housing development care.

6. The land is not stable to build on, as inland fill in 1982 due to previously used as clay and gravel pits, and for War World 11 munitions dumping and is referred to in ordinance maps and documents that WDC Environmental Health Dept have.

7. Worlingham Village would no longer exist but be a suburb of Beccles.

### **Rosemary Shaw**

The most suitable sites for development are those which would be served by the new road to the south, namely site numbers 8, 9, 81, 82 and 107 - and this would also apply to sites like number 124. It would make sense if these sites (8, 9, 81, 82, 107) had good cycle paths and walkways into the centre of Beccles even though they would primarily be served by the new southern relief/distributor road for motor vehicles.

### **R Simpson**

This and adjacent sites have more potential and my preference for reasons as follows; it offers direct vehicle access onto the southern relief road. People wanting to travel to Norwich and Lowestoft and local super markets have direct access to major routes thus relieving town congestion. This must be a bonus. Also I would propose cycle and pedestrian access routes feeding from the north of this development, thus also relieving the need to use a car. It has less impact on the environment (not many existing trees etc). The opportunity for new schools and small shops. Which will be needed within the site. Let's hope green space is also allocated.

### **Rachael Staniul**

Too many proposed houses – overdevelopment, unfortunately, the infrastructure in and around Beccles is struggling to cope now. We are told that the GPs at Beccles surgery have patient lists in excess of 2000 people per doctor. Where are almost 1000 new households going to find a GP, access to wider healthcare, and dental treatment etc. My husband and myself have to travel out of the Beccles area for dental treatment as it is.

You cannot build houses on this scale without serious thought and consultation as to how already struggling services are supposed to support it.

### **Councillor Caroline Topping**

Plot 82, but with a limited amount of housing maximum of approx. 400 in order that a further doctors surgery, school, sports pitches can be developed on this site and take some of the pressure off the other surgery/school/ dentists which are across town and adding to the already existing traffic issues, as this is already the most populated area of Beccles and to increase it further, without putting in the Southern Relief Road first would cause traffic to be at a standstill going across town for the facilities. Also drainage would need to be taken careful consideration of as this land is higher than the houses adjoining the land heading towards the town and the soil is clay. I would not wish to see the houses on plot 82 increasing the surface water flow towards the existing neighbouring houses and into town.

### **Edward Wilkinson**



I have serious concerns that Worlingham can sustain this number of housing developments and the current infrastructure and road systems. There are already traffic problems in an around the Worlingham/Beccles area, and serious difficulties around the NHS facilities currently available in this area.

#### **Beccles Society (Paul Fletcher)**

The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

#### **Beccles Town Council (C Boyne)**

Beccles Town Council rejects the Lark Fleet proposal area 82 based on its location to industrial areas, noise and air pollution and also the huge increase in traffic that it would bring down the Ellough Road into Beccles via the Ingate bottleneck. Any infrastructure added to site 82 would not be sufficient to cover the needs of residents and prevent the necessity to enter Beccles town centre. The development of site 82 was considered to be completely inappropriate and would be a disaster for the area.

#### **Citrus Sharp Security Shredding**

Having attended Larkfleet Homes PR Event I was not surprised at the high number of complainants, concerned about pressures on local resources & the danger of adding traffic onto Ellough Road & over congested A146., Although i share their anxieties, my main concern is commercial.

My SME, Citrus security shredding employs 3 good quality staff from Ellough area, we shred confidential data in an enclosed unit within V C Cooke's very secure 20 acre site. Part of the site is also leased to Aquablast who employ c15 staff, often high pressure water jetting in an open sided shedded area 200 yards from the main gates. VC Cooke employs 25 people.

This group of businesses would be a huge annoyance to the 975 prospective homeowners if permission was given to Larkwood Home developers, who have paid for the option to develop the field opposite the large waste processing site.

Even if planning permission terms are onerous to the developers, noise pollution carried from a working site on which all moving vehicles & plant have to make very loud warning sounds from early morning & into the weekends, in compliance with Safety Legislation, will make life unpleasant for householders, inevitably creating lots of complaints to woe.

VC Cooke have undoubtedly benefited the local economy over the last 50 years, currently employing 25 people. The business has achieved industry accolades for good environmental practice & won EDP Community Impact Award in 2011. Citrus & Aquablast have also been recognised for positive environmental impacts.

Regrettably i think that this could be the death knell of established & well thought of businesses, operating independently without subsidies employing hundreds of unqualified and unskilled people, even now supporting several illiterate family bread winners. All staff have benefited from regular training & many have progressed onto better things.

Waste handling & recycling sites are in decline, this site exceeds onerous Waste management legislative requirements. VCC run a tight ship, steering through rough waters to stay afloat, attracting custom from Biffa, Veolia, WDC, Hales, East coast waste, the Latitude festival organisers, Leisten skip hire, c100 builders & tradesmen hiring over 3500 skips pa & reducing landfill outcome for 400 mixed waste for commercial businesses.



Stringent licensing means that Waste sites are not easy to re-locate, the cost would be huge & expansion of residents into brown field developments now encroaching on industrial zones forces the Director's to question the value of re-locating at all & probably not a battle that can be won in the face of the economics of devolution.

I fear that WDC could be swayed by the benefit of EDF committing to extend the short electricity supply into the 975 new home development, & as WDC may well need this new homes bonus incentive to function, the proposed development could well outweigh the interests of the employees and VC Cooke & Aquablasts annual business rates contributions.

What a sad state of affairs that this prominent established & efficient business could well be seriously threatened by encroaching houses that should be located in a more suitable location with a far better chance of growing into a community if it was built away from a competing industrial growth area in Ellough, currently designated as a business Enterprise zone.

#### **Personal (Jonathan Blankley)**

If this area is developed, then southern development of the town has to stop there. Given its size the mix would have to reflect the needs of the existing community for smaller starter and retirement properties alongside larger family homes. The aim should be to address local needs rather than attract even more people into the area. There should also be significant green spaces alongside leisure and sports facilities. A small retail/commercial area that complimented the existing town centre would need to be considered One that would improve the facilities for Worlingham, alongside consideration for a small park and ride to link the area with the centre of town.

Even with the building of the southern relief road, the increased traffic into town would be significant, especially with regard to the school run, and plans would need to be included to cope with this.

#### **Resident (Mark Beglarian)**

This is my preferred option for future development in the Beccles area it is the only option that seems to have taken account of traffic and the strain on existing services. The Town desperately needs more schools, doctors surgeries and sports facilities, this option would seem to address this issue.

#### **Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

#### **Worlingham Neighbourhood Plan Steering Group (John Coulson)**

As a resident of Worlingham my concerns are for the areas listed (82, 62, 60, 44).

Increase in traffic

Will local drainage be able to cope. A recent response to our Neighbourhood Plan group indicates that foul and surface water drainage is already virtually at its limit.



What will WDC do to improve facilities in Worlingham as we currently have no village hall, pub etc.

What will determine the number / rate of housebuilding in Worlingham?

Can you please differentiate between Worlingham and Beccles, they are not the same place!

Will the local plan consider a new doctors surgery in Worlingham.

What is WDC position with the Larkfleet housing proposal. When will you have establish what growth level you will be working with?

How will our neighbourhood plan be able to influence WDC planning?

When do we need to have our neighbourhood plan in place to be considered in WDC planning?

### **Worlingham Neighbourhood Planning Team (Wendy Summerfield)**

We also feel that area 82, the land proposed for development by Larkfleet Homes off Ellough Road Worlingham is unacceptable as neither the village nor Beccles has the infrastructure, drainage, roads, schools, medical facilities or jobs to accommodate almost 1,000 dwellings.

## **83 - Land off Mill Lane, Barnby**

### **Charles Fortt**

Barnby's housing development must be limited by the nature of the road network into and from Barnby from the A146 and by the access to any site from Mill Lane. The village is not suitable for any but small scale development on small sites with good access/egress onto the A146.

### **Ian Anthony Lowe**

I have now reconsidered and no longer wish to offer this site as a proposed plot for the local plan at this time. Please remove this plot from the web site and any literature. Sorry for any inconvenience.

### **Julie Reid**

This land is a corridor for wildlife, and would have a detrimental impact on the environment.

The position of this site has limited to non-existent access.

### **Charlotte Sanderson**

I feel that this development would be inappropriate for a number of reasons:

This is currently a Greenfield site.

It is outside the village envelope.

The development of 11 homes would change the very rural nature of this end of the village, and would lead to the suburbanisation of the area.



I feel that this development would set an unacceptable precedent.

11 homes would place pressure on the struggling existing sewage infrastructure.

This area drains directly into the Hundred Drain and so into a SSSI and NNR. The increased run-off (likely to be contaminated with phosphates, nitrates and plastics) from these houses, patios, drives and roadways, should be a concern.

Barnby has no village shop, few places of employment, and no surgery. The school is full.

The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 22 cars regularly using Mill Lane and Swan Lane (and add a likely 66 extra vehicle movements a day).

There would be greater likelihood of collisions, particularly close to the junction with Mill Lane and the Garden Centre.

The “soundscape” of this part of the village is likely to change in character. Other than the noise of the A146, it is quite quiet. You can hear farm animals and wildlife. This is an important feature of the villages “breathing space”. It is likely that a suburban housing development would add lawnmowers, radios and voices, and so change peoples experience on the nearby public footpath.

The rural character of the night sky would change, with the addition of security lights and potentially street lights.

#### **Barnby Parish Council (Ian Hinton)**

At the end of the single-lane lode next to Oak Cottage on Mill Lane – the most difficult site to place new housing – currently farmland.

#### **Ian Reid**

A corridor for wildlife and as such development would have a detrimental effect on the environment. Limited to non-existent access to the site.

#### **Broads Authority (Natalie Beal)**

Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.

#### **Historic England (Debbie Mack)**

Wade Hall grade II to north and Wade Hall Moated Site Scheduled Monument. Potential impact upon the setting of the Listed Building and Scheduled Monument.

#### **North Cove Parish Council (Joan Pryce)**

Terrible access potential to increase flooding around The Drain

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 83 may contain habitats and species of conservation value. We therefore



consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

## 84 - Land off Parkhill, Oulton

### Oldman Homes (Philip Oldman)

1.0 The “Initial sustainability Appraisal of Emerging Options” is encouraging in that there are several positive points :

Improving health and wellbeing  
Improvement to access to key services  
Meeting housing requirements  
Encouraging efficient patterns of movement

Whilst the only negative points identified relate to

- (a) Conserving Natural Resources
- (b) To reduce contribution to climate change and mitigate effects”

With regard to (a) & (b) it is inevitable that there will be negative issues around these based on potential use of greenfield land, but this situation applies to the vast majority of sites being promoted through the overall land bid exercise.

2.0 The site offer potentially 42 dwellings (LPA estimate) and although largely a greenfield site it is located immediately adjacent to the built up area in Oulton at the northern end of Lowestoft. In any event within the present search for sites, the LPA has also recognised that greenfield development is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area which is largely brownfield in character.

3.0 As stated above, the site is adjacent to existing housing to the south and also the north east and south east on the opposite side of Parkhill. It could be built out as a “stand alone” site but there is also scope to look at a consolidated approach with land to the west which is also included in this exercise but is in separate ownership. This potential allocation involves several parcels of land identified as Sites 17,170 and 171 which cover a brownfield site covering the remains of the former Lothingland Hospital. Although not necessary the owners of Site 84 would be prepared to adopt a consolidated approach utilising these areas. Not only would this deliver more housing and therefore more efficient use of land but it would also facilitate a much improved access onto Parkhill via Site 84, thus avoiding what is at present a most unsatisfactory cross road arrangement at the intersection of Union Lane, Parkhill and Oulton Rd Nth.

4.0 Turning to Site 17 in particular, Oldman Homes Limited have a legal option to purchase this site as the owner wishes to provide a sustainable development accessed via Site 84 onto the B1375 thus avoiding the need to use Union Lane for access to through traffic.

5.0 In consideration of the overall approach outlined above, there may also be scope to utilise Union Lane as an emergency or restricted access to serve the wider development.

6.0 In consideration of the sites within the confines of the former hospital i.e. Sites 17,170 and 171 there is further scope to consider the possibility of linking with Sites 168 and 169 to the south of Union Lane

7.0 By adopting a consolidatory approach, this would also enable an element of strategic landscaping adjacent to Parkhill, thus creating an attractive entrance to the town when arriving from the north. Site 84 also has the benefit of direct access onto Parkhill which is less intensively used now that the Northern Spine Road has been



completed and is in operation to the east.

8.0 Furthermore, again although not essential, there is also scope to include Site 172 immediately adjacent to Site 84 to the north to promote more housing should the Council wish to pursue this option; otherwise it would appear unlikely that Site 172 could be allocated in isolation being detached from the built up area.

9.0 The Council predicts that at least 7700 new homes will be needed between 2011 and 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

10.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall; and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF.

11.0 Concentrating on Site 84 on its own merits, it is also understood that there are no viability issues and therefore development could be delivered swiftly, and in so doing help to contribute towards the required 5YHLS, with the support of the LPA.

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

84 Land off Parkhill

We do not consider this site suitable for development due to poor access and egress road infrastructure.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 54; 84; and 129 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **85 - Land off Rider Haggard Lane, Kessingland**

#### **Kessingland Parish Council**

With regards to site 85 (Rider Haggard Lane), site 109 (London Road) and sites 119 and 125 (Church Road) – none of the landowners came forward during the 4 years that the Neighbourhood Plan has been in progress, except the owner of sites 119 and 125 (part of these sites are being used as allotments), who stated that they didn't want to be part of the Neighbourhood Planning process. These two sites which are south of Church Road are part of the Area of Outstanding Natural Beauty (AONB) bordering the Kessingland Levels, and are not sites suitable for development.

Excluding site 41, which has been included in the Neighbourhood Plan, these 4 sites in total would bring forward 100 homes.



The Neighbourhood Plan, which is as a result of 4 years consultation with landowners and the local community brings forward 3 sites which would bring forward a total of 105 homes plus in the case of site SA1 a commercial incubator facility, in respect of site SA2 a new playing field recreation area extension and in the case of SA3 affordable homes held in perpetuity for the residents of Kessingland.

Therefore the 4 sites put forward in the Waveney Local Plan are considered to be surplus to the requirements of Kessingland, the 'Housing Needs Survey' figures are more than covered by the Neighbourhood Plan proposals, which should be included in the Waveney Local Plan in preference to the other sites put forward.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 41; 85; 109 and 119 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

#### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The "Initial Sustainability Appraisal of Emerging Options" is encouraging in that the only negative points identified relate to:

- (a) "Conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (b) Conserving natural resources
- (c) To reduce contribution to climate change and mitigate effects"

Furthermore the exercise has identified 3 plus points:

- Health and well-being
- Improving access to key services & facilities
- Meeting housing requirements of the whole community and

2.0 The site is identified by the LPA to have the potential for 60 dwellings. Development of this site is considered to be relatively close to a range of facilities.

3.0 With regard to (a) (b) & (c) above, It is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to include strategic planting to enhance the development and to mitigate the limited impact it may have on the rural hinterland which in any event would be reinforced by existing substantial tree planting along the northern and eastern boundaries, thus mitigating any impact on the Strategic Gap on the north side of Kessingland which in any event is being reduced through the promotion of a site in the Kessingland Neighbourhood Plan (KNP) to the south of Laurel Farm to the north west of Site 85 involving approximately 55 dwellings. The Laurel Farm site is more intrusive in terms of its location within the strategic gap and peculiarly does not appear to be being promoted strategically through this Call for Sites exercise. For your information a separate response will be submitted to the KNP (Reg 16) Submission Consultation Exercise presently underway.

4.0 The Sustainability Appraisal refers to the loss of protected woodland presumably in the corridor at the southern end of the site where access to Rider Haggard Lane would be provided, and is covered by a TPO. However this area does not appear to be identified in the KNP and should the land bid prove successful then replacement landscaping can be offered through the introduction of a landscaped area within the site comprising commensurate replacement tree planting and other plant species to compensate for the loss of the trees covered by the TPO. The TPO covers two groups comprising 46 Corsican Pine and 7 poplar trees in total, but at a glance do not provide particularly attractive specimens.

5.0 The LPA recognises that the site is in a sustainable location being relatively close to a range of facilities and



could assist in providing both much needed affordable and starter homes. The site offer potentially around 60 dwellings (LPA estimate) ,but a lower density scheme could also be considered to facilitate a higher level of strategic planting ;and although a greenfield site, given the present search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

6.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036, whilst the highest figure represents the need for 380 per year.

7.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

8.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.

## 86 - Land off Saxons Way, Halesworth

### Tony L

If outside the flood plain this would be a reasonable site to consider for housing after the 'Tesco' site and Dairy Hill developments completed

### Halesworth Town Council (N Rees)

Site 86 is an unusual shape and would therefore require very sensitive and original ideas to develop in line with surrounding areas.

### Historic England (Debbie Mack)

Proximity to Gothic House, grade II\* listed building. Potential impact upon setting of Listed Building.

### Historic England (Debbie Mack)

Proximity to Gothic House, grade II\* listed building. Potential impact upon setting of Listed Building.

### Suffolk Wildlife Trust (James Meyer)

Based on aerial photographs, sites 14; 76; 86; and 160 may contain habitats and species of conservation value.



We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This site was the route for the planned Phase 2 of the Halesworth Relief Road. It borders the London Road estate and the Millennium Green. A carefully designed scheme could work very well with access from Bigod Close/Lansbury Road.

### **87 - Land on Bungay Road, Holton**

#### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

#### **Halesworth Town Council (N Rees)**

Site 87 and 89 are in Holton and this area has potential flooding problems and so needs thorough investigation.

#### **Halesworth Town Council (N Rees)**

Site 87 and 89 are in Holton and this area has potential flooding problems and so needs thorough investigation.

#### **Historic England (Debbie Mack)**

Gavelcroft, grade II listed to north east. Potential impact on setting of listed building.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 87 & 89 Whilst within the village concept, the development of 75 houses between the two sites may be too much for the western side of Holton to contend with, given the flooding problems that Holton has suffered in the past.

#### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The "Initial Sustainability Appraisal of Emerging Options" is encouraging in that the only negative points identified relate to

- (a) "Conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (b) Conserving natural resources
- (c) To reduce contribution to climate change and mitigate effects"



Whilst there are 4 plus points:

- Health and well-being
- Improving access to key services & facilities
- Meeting housing requirements of the whole community and
- Encouraging efficient patterns of movement in support of economic growth

2.0 With regards to (a) the site is effectively an Infill site being sandwiched between Valley Farm to the north west and suburban development to the south east whilst opposite the site to the North East there is a large residential property. With regard to (a) (b) & (c), it is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to include strategic planting to enhance the development and to mitigate the already limited impact it may have on the rural hinterland.

3.0 The LPA recognises that the site is in a sustainable location being relatively close to a range of facilities and could assist in providing both much needed affordable and starter homes. The site offer potentially 30 dwellings (LPA estimate) and although a greenfield site, with the present search for sites, the LPA has recognised that greenfield development is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

4.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036, whilst the highest figure represents the need for 380 per year.

5.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF.

6.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.

## **88 - Land on Hulver Road, Mutford**

### **Charlotte Sanderson**

Not a sustainable place to build 140 houses. It would change the rural characteristics of the area, the occupants would be completely reliant on a car as there are little or no services in the area.

### **Historic England (Debbie Mack)**

Close to Kiers Cottage, Grade II Potential impact on setting of Listed Building.

### **Mutford Parish Council (John Armstrong)**



At their last meeting the Council also agreed that the proposed sites were totally unsuitable for development. Site 131 is a greenfield site, site 88 is also a greenfield site and would extend the curtilage of the Village and also impact on two grade 2 listed buildings. Council is also undertaking a neighbourhood plan and wish to wait until the outcome of the consultation process is known before responding to the other questions.

### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The “Initial Sustainability Appraisal of Emerging Options” highlights the following negative points :

- (a) Access to key services
- (b) Enhancing landscape
- (c) Conserving natural resources
- (d) To reduce contribution to climate change and mitigate effects

Whilst there are 2 positive factors:

- Improving health & well being
- Meeting housing requirements of the whole community

2.0 The site is identified by the LPA to have the potential for 140 dwellings. This site is adjacent existing development at the western end of Mutford (Newson Avenue) with footpath access into the village. The site will provide general market, affordable and starter homes

3.0 With regard to (a) (c) & (d) above, it is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, with regard to (b) there is sufficient room to substantially reinforce existing hedge cover to include strategic planting to enhance the development and to mitigate impact it may have on the rural hinterland.

4.0 The site offer potentially up to 140 dwellings (based on the LPA higher estimate) and could form part of a new rural settlement as advocated by the LPA under Option 4. Furthermore, although this is a greenfield site, given the present search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

5.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land and has indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

6.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore the there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

7.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve the both the Councils required 5YHLS and its Housing Strategy if supported by the LPA.



## 89 - Land on Lodge Road, Holton

### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

### **John Lavery**

This land is already be being built upon, so I don't quite understand why it's featuring in the plan!. Another example of creeping suburbanisation of a once pretty village!

### **Halesworth Town Council (N Rees)**

Site 87 and 89 are in Holton and this area has potential flooding problems and so needs thorough investigation.

### **Historic England (Debbie Mack)**

Gavelcroft, grade II listed to west. Potential impact on setting of listed building.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 8; 9; 44; 60; 62; 81; 82 and 89 form a large block of land which is likely to be of some value, particularly for farmland species. Careful consideration should therefore be given to the allocation of these sites for residential development, in order to ensure that it does not result in an adverse impact on the wildlife value of the area.

### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 87 & 89 Whilst within the village concept, the development of 75 houses between the two sites may be too much for the western side of Holton to contend with, given the flooding problems that Holton has suffered in the past.

### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The "Initial Sustainability Appraisal of Emerging Options" is encouraging in that the only negative points



identified relate to:

- (a) "Conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (b) Conserving natural resources
- (c) To reduce contribution to climate change and mitigate effects"

Whilst there are 4 plus points:

- Health and well-being
- Improving access to key services & facilities
- Meeting housing requirements of the whole community and
- Encouraging efficient patterns of movement in support of economic growth

2.0 The site is identified by the LPA to have the potential for 45 dwellings but this includes the 11 dwellings previously approved, and under construction on the southern and eastern sides of this field. Development of this site would effectively consolidate and form a complimentary scheme to that which is underway. Access would be gained via the existing Y junction approved under the granting of the last planning permission, which incidentally is delivering 8 affordable dwellings alongside 3 general market dwellings. The precedent set by the previous permission would underline the fact that development on this site should not significantly impact on the rural setting despite being on a field with a slight incline running downwards from north to south.

3.0 With regard to (a) (b) & (c) above, It is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to include strategic planting to enhance the development and to mitigate the limited impact it may have on the rural hinterland which in any event could be reinforced by existing hedging along the northern and western boundaries, as recognised by the LPA.

4.0 The LPA recognises that the site is in a sustainable location being relatively close to a range of facilities and could assist in providing both much needed affordable and starter homes. The site offer potentially around 35 dwellings (taking into account the LPA estimate) and although a greenfield site, given the present search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

5.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

6.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

7.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.



**David Ragan**

Having lived in barnby for 20 years, we feel that this site for proposal is unsuitable due to the following reasons:

There is no mains drainage, and already the water running down the hill adds to this problem

It is on a high water table area.

It is also bordering on a SSI SITE.

It is also situated on the dangerous bit of a road leading to the A146

which is already a dangerous junction also it only allows 1 car down at a time, with much more traffic this could be highly dangerous.

also getting out onto the A146

from the only other junction is at times very frustrating and dangerous.

thankyou

**Julie Reid**

This site seems proportionally appropriate in size to the village for future development, provided an environmental impact survey was to be carried out. Infrastructure currently exists.

**Barnby Parish Council (Ian Hinton)**

On the Hill, next to the Hundred Drain – part of this site already subject of a proposal for affordable housing which is under extended consideration. The Parish Council supported this application as it was for affordable housing.

**Ian Reid**

Site is appropriate to the size of the village for future development.

**Broads Authority (Natalie Beal)**

Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.

**Historic England (Debbie Mack)**

Proximity to Garden House, grade II listed to west. Potential impact on setting of Listed Building.

**North Cove Parish Council (Joan Pryce)**



Development into the open countryside. Natural SUD of villages will cause flooding in North Cove if built on .  
Part of green infrastructure

## NorCas

I think land in the Barnby area should be discounted because of the poor logistical position of the sites and the strain on the existing roads especially the A146

## Wellington Construction Ltd (Paul Pitcher)

1.0 The “Initial Sustainability Appraisal of Emerging Options” is encouraging in that the only negative points identified relate to:

- “(a) Conserving natural resources
- (b) To reduce contribution to climate change and mitigate effects
- (c) Enhancing biodiversity & geodiversity”

Whilst there are 5 plus points:

- Health and well-being
- Improving access to key services & facilities
- Reducing deprivation in all forms
- Meeting housing requirements of the whole community
- Enhance the rural economy

2.0 The site is identified by the LPA to have the potential for 45 dwellings including the northern part of the site where there is an outstanding planning application for 11 dwellings (8 affordable subsidised by 3 general market dwellings - LPA ref DC/15/1439) which has the benefit of a resolution to approve by the LPA (subject to a S106 Legal Agreement to ring fence the affordable Housing element from being sold on as general market housing). Development of this site would effectively consolidate and form a complimentary scheme to the proposal referred to above. It is interesting to note that this site, quite rightly, is considered to be capable of addressing deprivation through the introduction of affordable housing whilst this criterion has not been acknowledged on some other proposed sites where affordable housing will also be included.

3.0 This site could be built as a stand-alone development at a relatively low density (20-25 per hectare is suggested) utilising the access to the site ref DC/15/1439, or as suggested by the LPA in tandem with Site 57 to the east. Highway access would be gained via the 15/1439 scheme The precedent set by the previous resolution to approve serves to underline the fact that development on this site should not significantly impact on the rural setting .

4.0 With regard to (a) (b) & (c) above, It is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to reinforce existing hedge cover to include strategic planting to enhance the development and to mitigate the limited impact it may have on the rural hinterland, particularly on the southern boundary adjacent to the A146, as suggested by the LPA. The LPA also recognises that this site is contained by existing development, particularly to the north east and west. Although the site is considered to provide Grade 2 agricultural land it is fallow and only used as a paddock for grazing horses occasionally and is not in active agricultural production.

5.0 The LPA recognises that the site is in a sustainable location being relatively close to facilities and could assist in providing both much needed affordable and starter homes. The site offer potentially between 25-45 dwellings (taking into account the LPA higher estimate) and although a greenfield site, given the present



search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

6.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land. The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

7.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

8.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.

## **91 - Land on the junction of St Olaves Road & Slugg Lane, Herringfleet**

### **Paul Douch**

Totally inappropriate & undesirable; vehicular access dangerous onto both B1074 and Slugs Lane

### **Julie Reynolds**

Too isolated and disjointed from the village.

### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is within the Broads Authority executive area and should not be included in this consultation. However, as the Broads Authority is also reviewing its Local Plan the Parish Council will comment on this proposal. It is accepted that this site is not immediately adjacent to any of the main development of the villages but there was some support for housing here, although not at the density shown in the consultation document. This site might be suitable for future consideration for housing development.

### **Broads Authority (Natalie Beal)**

Site 91 is within the Broads Authority Executive Area.

### **Historic England (Debbie Mack)**

Proximity to Manor House Farmhouse, Barn and garden walls, all grade II listed. Potential impact upon setting



of listed building.

#### **Wellington Construction Ltd (Paul Pitcher)**

1.0 The "Initial Sustainability Appraisal of Emerging Options" highlights the following negative points :

- (a) efficient patterns of movement
- (b) To reduce contribution to climate change and mitigate effects
- (c) Conserving natural resources

Whilst there is 1 positive factor:

- Meeting housing requirements of the whole community

2.0 The site is identified by the LPA to have the potential for 16 dwellings. This site is currently used as paddocks and is adjacent to existing sporadic housing and farms/farm buildings dotted along St Olaves Rd Herringfleet. It is reasonably close to Somerleyton where local facilities and a railway station are available.

3.0 With regard to (a) (b) & (c) above, it is inevitable that there will be negative issues around the rural location being a greenfield site but this situation applies to the vast majority of sites being promoted through this land bid exercise. Furthermore, there is sufficient room to substantially reinforce existing hedge cover to include strategic planting to enhance the development and to mitigate impact it may have on the rural hinterland.

4.0 The site offer potentially up to 16 dwellings (based on the LPA estimate) including affordable housing and starter home provision. Furthermore, although this is a greenfield site, given the present search for sites, the LPA has recognised that greenfield development throughout the district is inevitable. This is particularly the case given the lack of progress with regard to delivery of significant amounts of residential development around the Lake Lothing area within Lowestoft.

5.0 The Council predicts that at least 7700 new homes will be needed up to 2036. Indeed the LPA recognises that this figure could be as high as 9500; and therefore there is considerable pressure to release additional housing land . The LPA has also indicated that 630 dwellings have been built throughout the district between 2011 and 2015. This equates to 158 per annum. Taking the lower figure above (7700) the requirement is 308 per annum (over the 25 year period between 2011 & 2036), whilst the highest figure represents the need for 380 per year.

6.0 Notwithstanding the fact that there are planning permissions in place for over 3000 dwellings and a further 633 included in allocated sites, nonetheless as illustrated by the Lake Lothing situation, there is some doubt over the ability to deliver the required housing. The fact that the Council is still seeking further sites at present reinforces this position and it follows that there will be likely to be a significant shortfall ;and therefore there is even greater need to promote sites which are available, viable and deliverable in accordance with Para 47 of the NPPF .

7.0 It is understood that there are no viability issues with this particular site and therefore development could be delivered relatively swiftly, and in so doing help to achieve both the Councils required 5YHLS and its Housing Strategy, if supported by the LPA.

## **92 - Land on the south side of Southwold Road, Brampton with Stoven**

#### **Historic England (Debbie Mack)**

Proximity to The Old Rectory, grade II to south west. Brampton Hall Grade II and Church of St Peter grade I



further south. Potential impact upon setting of high grade and other listed buildings.

### **93 - Land on the south side of Southwold Road (2), Brampton with Stoven**

#### **Historic England (Debbie Mack)**

Proximity to The Old Rectory, grade II to south west. Brampton Hall Grade II and Church of St Peter grade I further south. Potential impact upon setting of high grade and other listed buildings.

### **94 - Land on the West Side of London Road, Shadingfield**

#### **Historic England (Debbie Mack)**

Proximity to Park Farmhouse grade II to west and Shadingfield House grade II to south. Potential impact upon setting of listed buildings.

#### **Sotterley Estate (-)**

#### **Site Description**

9.1 Site Option 94 is located south of the village and in an exposed position on the edge of open countryside to the south.

9.2 Development in this location would lead to coalescence with Shadingfield to the south being just over 30m from the edge of the village.

9.3 Site Option 94 scores less well than the other sites in Willingham and is further away from the village facilities.

9.4 No other sites have been put forward by this land owner so there are not the opportunities for additional and improved community facilities that the Sotterley Estate are able to offer i.e. the opportunity for a circular walk from Sotterley Road to the footpath adjacent to Fox Farmhouse.

### **96 - Land opposite St Michael's Church, Church Lane, Oulton**

#### **Adam Skinner**

this land is suitable for housing development

#### **Historic England (Debbie Mack)**

Opposite Church of St Michael, grade I listed building. Potential impact upon setting of high grade listed building.



### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

96 Land opposite St Michael's Church, Church Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 18; 23; 51; 53 and 96 are in close proximity of areas of sensitive wetland habitat including Oulton Marshes CWS and Dairy Farm Marshes CWS. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact nearby sensitive areas.

## **97 - Land opposite Stoven Row Southwold Road, Brampton with Stoven**

### **Historic England (Debbie Mack)**

Proximity to Church of St Margaret grade II\* and on Heritage at Risk Register - and Church Farmhouse grade II in close proximity to the east. Also Cherry Tree Public House grade II to east. Potential impact to setting of high grade and other listed buildings.

## **98 - Land rear of Elizabeth Terrace, A12 London Road, Gisleham**

### **Trevor Cooke**

The "Initial sustainability Appraisal of Emerging Options" paper is encouraging in that the only negative points identified relate to;

- (A) "conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (B) "reducing contributions to climate change and mitigate effects"
- (C) "Conserving natural resources"

In response to item (A), whilst this is certainly a matter for consideration, we believe this potential issue can be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. With regard to items (B) and (C), considering Site 98 is Greenfield land, it is often the case that potential issues can be identified in relation to these matters, however given the scale and situation of the site, we believe that a potential development could be designed to involve particular features and possibly infrastructure improvements to mitigate and counteract these potential issues.

The site extends to approximately 1.58 hectares and could accommodate up to approximately 45 dwellings (based on an assumed 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

The site is potentially accessible from the A12 London Road, and benefits from a road frontage of approximately 50 meters, and given it's situation and proximity to existing dwellings it would be easily serviceable. It is within cycling distance of Lowestoft, a key area for prospective employment growth over the coming plan period.

It should be noted that historically, seven residential properties were situated on the site, and that the



associated footings are still in situ.

The development of Site 98 could also involve Sites 22 and 147 to the north, as these sites are also owned by Mr T Cooke. This could, potentially, allow for a larger and carefully considered strategic development which may perhaps involve a more substantial road network leading from the A12 London Road.

Subsequent to the previous narrative, we consider the site to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation to this site.

### **Teresa Garbutt**

As a long-term resident of the Waveney area, please find below my thoughts/comments on three of the proposed blocks of land:

Site 22 (117 proposed dwellings) – Hammonds Farm  
Site 147 (473 proposed dwellings) – Old Rifle Range  
Site 98 (54 proposed dwellings) – Rear of Elizabeth Terrace

These three sites provide a fabulous opportunity for different types of housing in South Lowestoft. Each block of land could provide a specific type of housing to meet different needs, and together they would form a diverse development that accommodates residents of all ages. The three sites could be developed as follows:

Site 22 – Affordable rented 1-2 bed apartments  
Site 147 – Affordable rented 2-3 bed houses  
Site 98 – Affordable rented 1-2 bed retirement accommodation (flats/bungalows)

Sites 22, 147 and 98 are also ideally placed to service this diverse range of residents, and the surrounding amenities would fulfil their requirements and provide a greater quality of life:

1. Close to schools for those with children
2. Close to shops (literally over the road, so can leave car at home and reduce carbon footprint)
3. On main bus route – Lowestoft to the north, and Kessingland/Southwold to the south
4. Close to the beach. This provides a free 'day out' for those with young children, and a pleasant walk in the fresh air for older residents. Many elderly people have mobility issues, and the proximity of the beach to the three sites makes it feasible in terms of exercise and enjoying the natural environment

This site could also provide an opportunity to provide a new type of private 'rented' property to the residents of Waveney. A large percentage of the population are now priced out of the housing market, and according to The Guardian, 'by 2025, more than half those under 40 will be living in properties owned by private landlords' (2015, see link below).

<http://www.theguardian.com/money/2015/jul/22/pwc-report-generation-rent-to-grow-over-next-decade>

Unfortunately, many of these people are not only priced out of the housing market, but are also ineligible for Social Housing. This leaves them in a 'no mans land' of private rentals, with little long-term security based on the current practice of 'two months notice' within their tenancy agreements.

Could Waveney provide quality and affordable 'private' rental properties that give greater security to tenants? After an initial six months probation within the property, could a longer lease period be agreed between tenant and landlord (say 5-10 years) as they do in continental Europe? This would be beneficial on



several levels:

- Landlords have the security of knowing they have a quality tenant in their property
- Tenants have the security of knowing they are not permanently on 'two months notice' within the property.

(This also encourages investment in the property by the tenant (new carpets, decoration etc), that they may not feel committed to make on a short term notice lease)

- Tenants looking to rent for a fixed term (5-10 years) could use that period in an 'affordable' rented property to save up for a deposit on a place of their own. If they subsequently become part of a couple, then a double income can assist in this process

All of the above contributes to a greater harmony in the landlord/tenant relationship, and provides stable and realistic housing opportunities for the residents of Waveney.

I believe that these three sites have fabulous housing potential within the Lowestoft area, and provide a very good quality of life for the future residents who live there.

#### **Bruce Provan**

It is crucial to keep the buffer between Lowestoft and Kessingland.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 21; 22; 34 and 98 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **99 - Land south east of Brickfields, Somerleyton**

#### **Paul Douch**

Potential for 5-6 houses, but much less desirable than brownfield site no.47 in Street because it would encroach on green field

#### **Gerda Gibbs**

This land is of historic interest as it is the site of the old brickfields that manufactured the well known Somerleyton red bricks. The actual sites to the old kilns are accessed by a pretty lane edged by bushes and trees passing by the lane to the Marina. The area where the ruins of the old brick kilns stand is an area filled with wild flowers and an abundance of wildlife including nesting Whitethroats and Blackcaps. This area is maintained by a group of volunteers. From the Brick kiln site the view over the proposed site (99) is lovely and filled with birdsong and the occasional woodpecker call. It would be shame to spoil such a lovely area with further development.

#### **Joy Jones**



As a home owner of one of the Brickfields cottages I would not like to see any housing development on this site for the following reasons

- 1) New housing here would increase volume of traffic through the village. Access to this site is on a blind bend when turning into Brickfields or the boat yard from Sluggs Lane and is already difficult. Increasing traffic here would increase risk of accidents.
- 2) Brickfields is part of the historic character of Somerleyton, which draws walkers and tourists to the village and provides income for business (pub, shop etc). Brickfields homeowners are required to maintain the historic appearance of their houses and new housing in this area would not be in keeping with the character of the village especially its Victorian history.
- 3) The site is a very pretty green area. We see a huge variety of wildlife on a daily basis on this site including barn and other owls, deer, many different birds and bats. To build on this site would destroy an important green space in the village. The footpath beside the site is part of Angles Way and this section of the path would lose its beauty if it became a housing estate. More housing here would also mean more artificial light at night in a place where we have dark skies and no light pollution.
- 4) If there is a need for more housing in Somerleyton I would prefer it to be on a site that has better access for vehicles and a site that has already been built on such as site 47, land at the former garage. Site 47 is nearer to the junction / turning to Lowestoft and is not used at the moment. The Brickfields site is used for crops and to build on this we would lose part of our countryside.

#### **Julie Reynolds**

Access to the site is presently poor. Too much on the outskirts of the village, new housing should be more centred.

#### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for housing development as it will ruin the open aspect of the countryside, it has little connection with the centre of the village and the access would be onto an already dangerous corner where The Street meets Slugs Lane.

#### **Historic England (Debbie Mack)**

Adjacent to Conservation Area and proximity to White House and Pond Cottages, both grade II listed to north east. Potential impact on setting of listed buildings and conservation area.

#### **Somerleyton Estate (Lord Somerleyton)**

#### **Site Description and Development Potential**

12.1 Site Option 99 is located off The Street and to the south of The Cedars. A plan of the site is included in Appendix 10. The site is 0.48ha in size and is generally flat, sloping slightly to the south.

12.2 According to Policy DM16 a density of 30dph would indicate a minimum of 14 dwellings on this part of the site. **Following the form and density of nearby development at Brickfields Cottages and Marsh lane the site has capacity in excess of the 5 dwelling minimum threshold and it is likely that, dependant on housing**



**type, a figure of 8 to 12 dwellings (including 2 to 4 affordable homes) would be appropriate for this site.**

12.3 Access to the site would be via a short stretch of private roadway owned by the Estate which also serves The Cedars, the boatyard and marina which would be improved.

12.4 Visibility at the junction with The Street is good in both directions extending some 50m to the left and 60m to the right on exiting into a 30mph zone.

12.5 The site is currently in agricultural use in an area of Grade 3 land.

#### **Assessment Response to Issues and Options Consultation and Site Sustainability Appraisal**

12.6 The site sustainability appraisal (SSA) at Points 1 and 4 refer to “limited village facilities”. This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised.

12.7 At Point 9 the SSA states “not consistent with existing settlement form”. We disagree with this assessment. One need only look at the form of development along Brickfields Cottages and Marsh Lane nearby to see how a site of this shape could provide for a linear development of similar form. Suggest the score is raised to 0 (neutral).

### **100 - Land south of 1-4 North End, St James Road, All Saints and St Nicholas South Elmham**

#### **Historic England (Debbie Mack)**

Whaleys grade II\* listed building to west, The Elms, also grade II\* west and a number of grade II listed buildings including The Willows and Barn to the north, and All Saints cottage to the south and Moat Farmhouse to the east. Potential impact upon setting of high grade and other listed buildings.

### **101 - Land south of Hill Cottages, Shadingfield**

#### **Historic England (Debbie Mack)**

Turnpike Farm grade II to west, Hill Farmhouse grade II\* and Service Range grade II to north. Potential impact of setting of listed buildings.

#### **Sotterley Estate (-)**

#### **1.0 Introduction**

1.1 Waveney District Council is responsible for planning for the housing and employment land needed in Waveney in the future. They are in the first stages of preparing a new local plan which will determine the number and location of new housing and employment sites in the District for the period up to 2036.

1.2 As part of this process the District Council is consulting on the sites submitted to them as a result of the



Call for Sites consultation earlier this year and the future development options for the District .

1.3 Evolution Town Planning have been instructed by the Sotterley Estate to make representations to this public consultation. This is an early stage in the process whereby the Council allocates sites for housing and employment development.

1.4 Evolution Town Planning (ETP) are experienced in promoting rural sites either through development plan representations or planning applications. We also have site assessment experience from working in Council planning departments. As a practice we have 30 years of combined professional experience in this type of work.

1.5 These representations involve a potential housing site in Shadingfield and respond to the District Council's Site Options. We have also responded to questions in the consultation document and completed the requisite proforma which has been submitted separately. It is included here in Appendix 1 for ease of reference.

1.6 These representations build on the information submitted to the Call for Sites consultation and should be read alongside them.

1.7 The site has been assessed and we consider it remains suitable, available, achievable and viable taking into account relevant policy requirements and obligations.

1.8 The identification of the site results from a village-wide walk over and assessment of the development potential. The plan in Appendix 2 identifies the site, its location in the village and its surroundings.

1.9 According to evidence in the Waveney Village Profiles and from our tour of the village Shadingfield benefits from a number of local facilities and services shared with Willingham which contribute to its sustainability.

1.10 The Sotterley Estate is open to the tenure and mix of housing which could be delivered in the village. Much depends on the final site selection and local needs but could include bungalows, affordable housing and smaller homes for first time buyers.

1.11 Because it is unclear at this stage precisely how the District Council will be responding to recent Government guidance on boosting housing supply and recognising the benefits of rural housing the recognition of the village's sustainability credentials this is something we will be pursuing through the local plan review.

1.12 In the meantime we invite the District Council to consider the information in this report, the merits of the site to enable the village of Shadingfield it to 'play its role in delivering sustainable development'<sup>1</sup> in Waveney.

## **2.0 Planning Policy**

2.1 The Waveney Core Strategy dated 2009 was an early respondent to the 2004 Planning Act in respect of the adoption of the Local Development Framework in comparison to other Council's in Suffolk.

2.2 While direct comparisons are difficult it is apparent that other District Council's direct development to smaller settlements than do Waveney. For example Suffolk Coastal (2013) identify local service centres and 'other' villages, St Edmundsbury (2014) identify local service centres and infill villages and Babergh (2014) identify hinterland villages.

2.3 In comparison to these other Core Strategies in Suffolk, partly due to its age, the Waveney LDF gives relatively little attention to the contribution that villages can play in contributing to rural housing supply. A large number of villages, often with access to local services, are relegated to being classified as being in the open countryside where a general safeguarding approach is advocated in the Waveney Core Strategy.

2.4 The Waveney Core Strategy predates the 2012 National Planning Policy Framework (the Framework) and more recent Planning Practice Guidance (PPG) and as such is becoming increasingly out of step with national



planning policy imperatives. Plus recent Government requirements for local plans to be in place by early 2017.

2.5 For example the Framework states that “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby”.

2.6 The PPG provides further guidance on rural housing and states (our emphasis in bold):

*“Rural Housing How should local authorities support sustainable rural communities? Paragraph: 001 Reference ID: 50-001-20140306*

*It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements . This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.*

*A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities .*

*Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.*

*The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”*

2.7 The Waveney New Local Plan is at an early stage and it is not yet clear how Waveney District Council will be responding to these national policy imperatives and how this will be reflected in revisions to the settlement hierarchy in the spatial strategy.

2.8 It is not known whether the District Council will refresh their settlement hierarchy and direct a proportionate amount of housing to all sustainable settlements including villages previously overlooked or whether they will abandon the ‘blanket approach’ of settlement boundaries and allow development where it can be shown to be sustainable and well related to the built form. Much will depend on the responses the Council receives to the Issues and Options consultation.

2.9 In terms of policy guidance on the site assessments below we have had regard to policies of the adopted Core Strategy (2009) , the CIL Charging Schedule and the Development Management document (2011) ; specifically policies DM16 Housing Density, DM17 Housing Type and Mix and DM18 Affordable Housing.

2.10 The Council acknowledges the need to review these policies as part of the new Local Plan as they were based on former national planning policy priorities and predate the Framework and Planning Practice Guidance.

2.11 These local policy documents are adopted and, as the Council acknowledges, form a useful baseline now and we have had regard to them in the same manner.

2.12 The National Planning Policy Framework (The Framework) seeks to deliver sustainable development. We consider that the assessment below shows that the residential development of any of the sites we have submitted will meet the social, environmental and economic tests for sustainable development.



### **3.0 The Village of Shadingfield**

#### **Geography**

3.1 Shadingfield is located in the centre of Waveney District and is 5 miles from the town of Beccles and 6.8 miles from Halesworth. Shadingfield is on the Anglian Bus route between Beccles and Southwold. The A145 between Blythburgh to Beccles road runs through the village.

3.2 The population of Shadingfield is 178 people. The village is part of the combined parish of Shadingfield, Sotterley, Willingham and Ellough (with Weston) which has a combined population of at least 700 people. This is important because, as set out above, the NPPF recognises that “development in one village may support services in a village nearby” and Willingham is centrally located to these other villages.

3.3 With the exception of a few nearby listed buildings Shadingfield village is without environmental or heritage designations that would inhibit development.

#### **Key Facilities**

3.4 The Waveney District Council Village Profile (Appendix 3) for Shadingfield lists the key facilities which contribute to the sustainability of a settlement.

3.5 If read in conjunction with the village profile for Willingham (because of its close functional relationship) the key facilities include a public house, and meeting place. Additionally Willingham has the playing field, bus shelter and stops, post box and recycling point.

### **4.0 Site Option 101 Land South of Hill Cottages**

#### **Site Description and Development Potential**

4.1 The site is located in Shadingfield, south of Hill Cottages and off the A145 London Road. A plan of the site is included in Appendix 2.

4.2 The site is 0.4ha in size and is well related to neighbouring built form in what is an elongated village of groups of dwellings. It is a regular shape with a pair of goal posts and some play equipment in one corner.

4.3 According to Policy DM16 a density of 30dph would indicate a minimum of 12 dwellings on this part of the site.

4.4 More appropriately and reflecting the density of surrounding development this site could provide for at least 5 dwellings (including 1 affordable home) arranged in a manner sympathetic to the site and its location. This would probably in linear form fronting the road with a single shared access.

4.5 The site is bounded to the north and south by residential land use and to the east and west by agricultural use.

4.6 The site has a significant frontage onto London Rd which is in a 30mph zone.

### **5.0 Conclusion**

5.1 This report promotes a site in Shadingfield in response to the new Local Plan Issues and Options consultation. The extent of land allocations in Shadingfield will depend on the increase in housing demand across the District since the local development framework was adopted in 2009.

5.2 There is a pressing need to deliver a significant boost in housing supply nationally and Planning Practice Guidance makes it clear that rural areas can play their part. Shadingfield is a part of a group of villages that



benefit from a range of facilities where development in one can support services and facilities in another.

5.3 We have reviewed national and local planning policy and guidance and have visited the sites and toured the area. We submitted only those sites which met the consultation threshold and the criteria set out in the Strategic Housing and Economic Land Availability Assessment consultation methodology (Oct 2015).

5.4 Our site assessment shows that the site remains suitable, available and achievable and that an allocation for development could meet the economic, social and environmental principle of sustainable development.

5.5 The site has the ability to provide for a mix of housing types to meet the needs set out in the Waveney Housing Market Assessment and evidenced local need.

Map of site and Shadingfield village profile attached.

## 102 - Land south of Sparrowhawk Road, Holton

### Tony L

We need more employment sites in Halesworth and this is a sound location but would propose leaving some spaces near the housing on this road and leave the right-of-way that crosses the edge if this proposal intact.

### John Lavery

It doesn't make any sense to take agricultural land here, especially as there is a huge brownfield site (the Airfield) just over the road - ripe for Industrial Development!

### J Munson

Additional employment land allocation for Halesworth is welcomed to generate higher levels of locally based employment and therefore reducing need for people to travel to other locations for work. This site is close to the main road and existing employment sites so would appear appropriate (subject to design and planning and minimal impact on any local housing)

### G H Thomas

*This land for development '102' is shown designated for employment - very easy to say "employment" but what sort and therefore what sort of building work will be carried out? How long will the building work take? How many people will be accessing the area during building and when in use? All of these have a potential impact on the environment as to traffic and footfall, noise and hours in which the area is used day or night? Until questions are answered it is very difficult to make a measured and logical opinion*

### Environment Agency (-)

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 1

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner,



outer and total catchment).  
<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### **Halesworth Town Council (N Rees)**

Sites 102 of (3.04) hectares is potentially a good site for industrial use and has good access. Both site 102 and site 76, (27.72 hectares,) are on the borders of Halesworth / Holton and both Councils would need to look jointly at any development and the implications for services and infrastructure.

### **Historic England (Debbie Mack)**

Archers Cottage, grade II to east. Potential impact on setting of listed building.

### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
- ▶ 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane
- ▶ 102 - Land south of Sparrowhawk Road
- ▶ 13 - Fairview Farm, Norwich Road
- ▶ 30 - Land adjacent to Elms Lane

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).



If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

### **Appendices - National Grid Assets**

Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)

### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Halesworth needs industrial land allocation. Although this site has access via Sparrowhawk Road, ways must be found to mitigate problems of water run-off and traffic movements towards Holton.

## **103 - Land south of The Street (adjacent to 36 Holton Road), Holton**

### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

### **Tony L**

Too dangerous a position for any housing or other developments

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

### **Halesworth Town Council (N Rees)**

Similarly, Sites 73 and 121,103, 148 are classified as Holton and HTC and Holton would need to look at this together.

### **Halesworth Town Council (N Rees)**



Sites 32, 103 and 148 are Holton.

**Historic England (Debbie Mack)**

Adjacent to Holton Conservation Area. Proximity to The Homestead, Grade II and Millside and Myrtle Cottage, both grade II. Potential impact on setting of listed buildings and Conservation Area.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Housing on this site should only be considered if it is part of road safety improvements/development to improve the corner on the B1123 and junction of B1124

**104 - Land south of The Street, Wissett**

**Michael Fontenoy**

The road from Halesworth into the Saints through Wissett is narrow and would need serious upgrading to handle the additional vehicular traffic that this site and the other sites proposed in the villages in the Saints would generate. The road through Wissett is narrow with houses close to it so upgrading would be difficult. The options for public transport are currently limited so the council would have to persuade bus companies to provide services.

**Janet Holden**

The road through Wissett and towards Halesworth is very narrow and the building of up to 54 homes will result in more traffic using a road that was not built and certainly isn't maintained to cope with an increase in use. I have noticed that the council extended the 30 miles an hour stretch of the road through Wissett and that speed reduction measures like occasional radar speed signs are employed on the road which implies to me that there are known problems with the road. Consequently any increase in traffic will exacerbate an existing problem. New houses will bring young families with children to live in the village and so road safety concerns particularly in relation to the safety of children will become a significant issue, especially as there are no pavements on the road through the village, If this site is built upon I would expect the district and county council to seriously consider the consequences of increased traffic density and road safety issues.

**John Lavery**

A simply ridiculous place for development. This is just a landowner out for a quick buck on a small piece of land next to The Street. This will not make any significant impact towards development targets, yet could spoil a mature and attractive settlement.

**Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Partly in Flood Zone 3

\*Flood Zone – A floodplain is the area that would naturally be affected by flooding if a river rises above its



banks, or high tides and stormy seas cause flooding in coastal areas.  
<http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

#### **Halesworth Town Council (N Rees)**

Site 104 is in Wissett.

#### **Historic England (Debbie Mack)**

Located in Wissett Conservation Area. Immediately adjacent to Whitehouse Farmhouse and Barn, both Grade II listed and Church of St Andrew, grade I listed to west. Significant impact upon Conservation Area and potential impact on setting of high grade listed building and other listed buildings.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

House building on this site and scale would greatly increase the problems outlined in our submission for sites 106/140/141

#### **Wissett Parish Council (Bill Sampson)**

Subsequent to the presentation attended by our Chair on 5th May and your email of 6th May, Wissett Parish Council discussed this matter at length on 19th May.

The Parish Council agree in principle for the need of new housing in the village, but have concerns over the potential size of a new development as suggested in the Local Plan.

The land shown as plot 104 in the plan with the potential for 53 homes has listed buildings in situ, which we could not agree to being removed.

Wissett is a rural village of some 131 dwellings with a population of circa 268. The addition of the potential 53 new homes would therefore increase the amount of homes by some 40%, and assuming an average of 3 people in each new home, a population increase of around 60%. We do not believe that this would be either sustainable, or in keeping with the village profile.

Roads to access and through, the village are also narrow and we currently experience traffic flow of around 34,000 vehicles per month through The Street, as recorded by our VAS equipment in April 2016.

Wissett has no facilities, other than a pub. There are no shops and no public transport. There are very few safe hard paths, limited lighting, no on road parking, only a small car park (at the opposite end of the village).

Halesworth is over a mile away with no hard paths to walk there, so a car is essential. Halesworth Surgery is already busy, the hospital is marked for closure, and there is no secondary school, only a small junior school.

Any proposed development should be small (i.e. similar to Farm Close), and must have adequate off road parking for the home owners, and visitors, vehicles. It should also have an open area for play etc, as walking on the narrow road to the village field may be dangerous. Access to the site would also have to be looked at i.e. off of The Street or Mill Road. The Street is already busy as indicated above, and Mill Road is very narrow with few passing places. We believe that major road and footpath improvements would have to be made.



## 106 - Land to north of 34-48 Old Station Road, Halesworth

### Edward Barnaby Milburn

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

### Historic England (Debbie Mack)

Wissett Hall grade II to north west. Potential impact on setting of Listed building.

### The Halesworth & Blyth Valley Partnership (Ezra Leverett)

Site 106; 140; 141 the creation of 87 houses lacks adequate infrastructure on Wissett Road leading to Norwich Road, the narrowest junction in Halesworth, with the danger of increased traffic bordering the Edgar Sewter School.

## 107 - Land to the east of London Road, Weston

### Beccles Society (Paul Fletcher)

The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

## 108 - Land to the east of London Road (south of John Lawrence Close), Beccles

### Councillor Caroline Topping

As I said earlier, I am not against Beccles having new affordable homes and bungalows however these need to be built in manageable sizes around the periphery of the town and brown field sites such as plot 16 (24 homes) in the town centre and plots 156 (260 homes), 43 (40 homes), 108 (49 homes) all along a current main road, where there is currently little development and not feeding into the current traffic hot spots which is Ingate Street/Lowestoft Road.

### Beccles Town Council (C Boyne)

Whilst the council appreciate the need for development in the area over the next twenty years, it must be handled with great care as the infrastructure in Beccles is at breaking point now, especially the Health Centre.



With this in mind, it is felt that any housing development should be restricted to the area to the South West on one or two of the sites numbered 24,43, 108, 145 and 156, as this makes the best use of the existing and planned road infrastructure. However, this area would require a new primary school and a convenience store and other associated infrastructure to service any expansion. In addition, the two small sites in Beccles, numbers 1 and 16 and site number 60 in Worlingham could also be included as sites for development.

## **109 - Land to the North of 109 London Road, Kessingland**

### **Mary Hill**

Having bought a Grade 2 listed building, Pond Farm, from the owner of this patch of land 26 years ago, we were promised that the remainder of the site would not be put up for redevelopment. We have only just found out that this is no longer the case and that planning permission is being sought for the development of 10 houses. All three of the neighbours, each side and opposite are very angry that this has happened, and hope that you see sense in not approving this application. This would also be breaking the Strategic Gap that we were promised would not be broken when we first arrived in Kessingland. We spent a lot of money and time restoring our 400 year old house, and DO NOT want it surrounded by new modern housing. Kessingland Parish Council are also totally against this.

Mary Hill

### **Mary Hill**

I have commented on this already, but am shocked to find that the owner, the grandson of the person that we bought our Grade 11 listed building Pond Farm from is trying to obtain building consent on this piece of land. When we bought this property 26 years ago it was all part of the Ashley Garden Centre site, and the owner promised that the piece of land in question would remain a green field site as it is in the Strategic Gap between Kessingland and Pakefield. We have spent much time and money restoring our 350 year old house and outbuildings to their former glory and would not wish to be surrounded by modern properties. Kessingland Council feel the same. Our neighbours at 109 London Road, and ourselves have always maintained the hedgerow and grass verges on London Road, and obviously kept our boundaries tidy. This piece of land has now become a haven for wildlife and we would wish it to remain the same.

### **Jo Thompson**

Further to my initial comments on this site.

This site has been neglected by the owner for over a decade. The owner is not a local resident.

Neighbours on both sides of the property have voluntarily undertaken maintenance to prevent growth spreading beyond its boundaries. The accidental result of this is that the land has become a haven for wildlife and a very beautiful meadow.

To the north of the land is a grade II listed building (Pond Farm) which has been lovingly restored by its owners, including an extensive pond, that is a valuable asset to the heritage of the village. Its value and beauty would be considerably diminished by building to its boundaries.

In the past, adjoining neighbours to the land have attempted to engage with the owner to discuss buying, renting or managing the piece of land. The owner has not engaged with us (beyond legal warning letters about trespass) and clearly has no interest other than obtaining change of use and selling at development



prices.

I appreciate this is within the owner's rights but it is not in the interest of the neighbourhood and village.

It is green belt land and forms a valuable part of the 'strategic gap' between Kessingland and Pakefield/Lowestoft.

Any development there would have no requirement to provide affordable homes which are the only homes needed in Kessingland and would not add anything to the infrastructure or sustainability of the village.

On a purely personal note, as the adjacent owner to the south of the land, the boundary is one metre from my north facing windows. My west facing and north facing windows are currently looking onto open land and are not overlooked. Any building would significantly impact on my privacy and (probably) my light.

I strongly object to any building on this land.

### **Jo Thompson**

This is an initial response on seeing the plans for the former Ashley's site in London Road.

I am alarmed to see that the plan shows this potential development to the west of London Rd as well as the east. The small parcel of land between 109 London road and Pond Farm is NOT part of the former Ashley's site and is not Brown Field land. This small parcel of land is still owned by the family that held the parcel of land including Ashley's and Pond Farm. It is the only piece of land they still retain.

Until ten years ago it was a horse pasture and prior to that a Market Garden. It has never been brown field.

Ten years ago the family discontinued care of the land and left it to grow wild. In that time it has become a nature reserve and provides valuable nesting habitat for many species of birds (a colony of Linnets has established there and is increasing), Plus ground cover for wildlife, including deer, hedgehogs, snakes, weasels and voles.

The development of the former Ashley's site is included in our village plan but the small parcel of land opposite to the west of London Road has never been part of that plan.

I object very strenuously to any plan to build on this land and am hoping that its inclusion in the plan is a mistake as in times gone by it was under the same ownership as Ashley's (but not by Ashley's).

I should declare at this time that I am also Parish Councillor in Kessingland, although this response is entirely as a resident living adjacent to this piece of land.

### **Historic England (Debbie Mack)**

Adjacent to Pond Farmhouse grade II listed to north. Potential impact upon setting of Listed Building.

### **Kessingland Parish Council**

With regards to site 85 (Rider Haggard Lane), site 109 (London Road) and sites 119 and 125 (Church Road) – none of the landowners came forward during the 4 years that the Neighbourhood Plan has been in progress, except the owner of sites 119 and 125 (part of these sites are being used as allotments), who stated that they didn't want to be part of the Neighbourhood Planning process. These two sites which are south of Church Road are part of the Area of Outstanding Natural Beauty (AONB) bordering the Kessingland Levels, and are not



sites suitable for development.

Excluding site 41, which has been included in the Neighbourhood Plan, these 4 sites in total would bring forward 100 homes.

The Neighbourhood Plan, which is as a result of 4 years consultation with landowners and the local community brings forward 3 sites which would bring forward a total of 105 homes plus in the case of site SA1 a commercial incubator facility, in respect of site SA2 a new playing field recreation area extension and in the case of SA3 affordable homes held in perpetuity for the residents of Kessingland.

Therefore the 4 sites put forward in the Waveney Local Plan are considered to be surplus to the requirements of Kessingland, the 'Housing Needs Survey' figures are more than covered by the Neighbourhood Plan proposals, which should be included in the Waveney Local Plan in preference to the other sites put forward.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 41; 85; 109 and 119 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **110 - Land to the north of Black Street, Gisleham**

#### **Charles Barker**

Black Street is a very narrow country lane where two vehicles cannot pass safely without one pulling over. School children walking to the bus stop for the school bus have no footpaths and any future development could possibly add one hundred and fifty cars into the area (on the basis of 70 new houses, as suggested.)

The elevated, sloping site means hard surfacing will cause drainage problems, properties on the opposite (lower) side would suffer. The sewage system, already at full capacity would need to be upgraded with a contingency plan for breakdown, with backdrop construction due to the elevation.

There is an overhead electricity supply which is also likely to need updating.

Contractors vehicles and equipment would be chaotic, causing mud on the surrounding roads as we have experienced from farm traffic in past years.

For the houses on the lower side of the road the proposed development would be an intrusion of privacy. This site is totally unsuitable for housing expansion - no public transport, shops, or medical facilities which are not already straining to cope

Apart from practical considerations, there is a magnificent row of ancient oak trees that overlook the hamlet of Black Street from the rear of the proposed site, and give the area its identity. These should not be sacrificed in the interests of this proposal.

Consideration should be given to the residents of this area, as well as the long term detrimental effects on the surrounding countryside.

#### **Andrew Burton and Myrtle Boon**



We wish to strongly object to Site No. 110 as a potential building plot for 70 properties in Black Street, Gisleham, our reasons being:

- The 2.3 hectare plot is described on your web site as shrub and overgrown, this statement is not accurate, older residents of Black Street will confirm that the field directly behind Latymere Close has been under annual cultivation for the last 60 years. The small plot sited in a sand pit at the top of Sandy Lane is overgrown and was possibly looked at by your building- inspector
- There are 60 properties at the northern end of Black Street; the addition of 70 new homes would spoil the character in this peaceful Hamlet.
- Access on Black Street is restricted and poor, both ends are only one vehicle wide, over the section of the road in front of the development vehicles can only pass with care.
- The increase in traffic using Black Street will more than double the number of vehicles using the road. HGV, delivery vehicles and cars are often parked in Black Street through necessity although the road is not suitable; this causes problems with HGVs and farm machinery when negotiating the street. Damage to fencing, hedgerows and brick walls is a constant problem due to heavy vehicles trying to negotiate the road.
- Surface water from surrounding fields and properties drains into and along Black Street; flooding the road is well documented causing damage to properties and gardens, the existing drains have proved inadequate during times of heavy and persistent rain fall. Water runoff from any development will only exacerbate the problem.
- The present traffic load has caused the road surface to subside in places due to increase in size of farm machinery and HGVs using the road in recent times, this subsidence has attributed to the flooding as surface water has not been running into the drains.
- The sewage pumping station in Black Street has in the past proved inadequate and has caused gardens on the south/east side of the road to be flooded with raw sewage.
- Black Street and the properties on the south/east side of the road are on a flood plain and properties and gardens have been flooded (reflected in increases in insurance premiums) during periods of persistent rain.
- There are no footpaths in Black Street. Local residents and school children walk and cycle along the road; it is also popular with hikers, horse riders and pony and traps and dog-walkers.
- There is no gas supply or fibre Optic broadband available
- There would be considerable light pollution from the new street lighting
- At certain times of the day Strobing (light flicker) from the wind Turbine affects residents along Black Street as well as the noise as the nearest Turbine is only 600 metres distance.

We hope you will agree that this site is not suitable for development as part of the Waveney Local Plan.

**Terence and Margaret Bullard**

It has come to my attention that Waveney District Council have a building proposal on the table for site 110 in Black Street.

Whilst I might agree that the land is probably suitable for a small number of houses, it is impossible to contemplate up to 70 houses being on the site.

There are several reasons for this that I list below.



1. There are only 65 houses in Black Street so the number of houses proposed would more than double the hamlet's population.
  2. This situation would put extreme pressure on the sewage system which already has problems coping.
  3. There are no local shops.
  4. No public transport.
  5. No pavements.
  6. Narrow roads where it in most cases cars cannot pass one another.
  7. The proposed houses would be higher than the existing road and rain would flow down and flood the lane and probably houses.
  8. The lower part of Black Street is already on the environment department's list for medium risk of flooding so any excess would be disastrous.
  9. The schools in the area are already over-subscribed.
  10. The loss of mature oak trees.
  11. No regular policing in the area including Kessingland our nearest village.
  12. The local doctor's surgery is finding it difficult to cope with the number of patients now.
- At the average of two cars per household it would cause absolute chaos on Black Street's narrow lanes and could put lives at risk.

Also any housing on that site would be affected, as we all are, by the wind turbines. The strobing through the winter months, and the horrendous noise whenever the wind blows.

In conclusion I would like to state that I hope Waveney District Council will conclude that such a proposal would only have a negative effect on the residents of Black Street, and will likely cause extreme problems.

#### **Mr & Mrs Bullen**

Black Street is a small hamlet within a rural setting. My husband and I have lived here for 15 years and we are concerned that it has now been identified for the potential development of 70 houses.

We have significant concerns regarding the potential development and wanted to make sure that our concerns would be taken in to account when the Council considers their planning policy.

Planning applications are considered on their own merits, and therefore the objections I am making to the proposed scheme relate to the development as a whole, and not specifically regarding design, materials, overlooking, as no plans have been submitted.

Black Street is a very narrow road and two cars have difficulty in passing each other. The extra vehicles generated by the proposed development would be at least 35, and this is if there is only one vehicle per household. Realistically most households now own two cars. We already have a problem with oil tankers, and farm vehicles (there are two farms in the vicinity) using this narrow road. It is not only the inconvenience of not being able to pass but also that the surface of the road would certainly deteriorate as a result of the extra vehicular activity generated.

Black Street is in a Flood Zone and heavy rain causes flooding to some of the properties. We are concerned that the current drainage system would not be able to cope with the water produced by the extra households. The marsh land to the back of our house is boggy and also floods.

We believe that the visual impact of such a large development would be harmful to the open and rural character of the area.

The amenities of the residents of Black Street will be adversely affected because of the high density and over development of the site.

There are several badger sets in the area proposed for development and the other wild life, such as deer, bats



and birds in the area will be endangered by the proposed development.

Please ensure that our objections are recorded as part of your consultation process, thank you.

### Ian Cook

I am writing to you with reference to the proposal for building of new properties on the land identified in Black Street Gisleham.

I am not in agreement for the proposal in the given location for the below stated reasons.

1. Access – Black street access from Snab Hill is at best a single track route. Given the limited number of current residential properties the road can be dangerous turning in from Snab Hill due to restricted vision and areas to pass (unable to pass 2 vehicles along large sections of the road). At certain times of the day and year this becomes even more so with heavy plant and lorries servicing the farm. The road is also frequently used for dog walking, running and general access and with no footpaths poses a potential hazard with further traffic. The proposal of circa 70 additional properties with an average of 2 vehicles per household makes this a serious concern and increased hazard.
2. Services (Electric) – Black street is fed via overhead power cables. It is common for the properties in the area to suffer power cuts in adverse weather. It is believed that the supply to the area would not withstand further building without serious upgrading.
3. Services (Gas) – Black street has no mains gas supply. All properties are either oil, solid fuel or electric.
4. Services (sewage) – Black street sewage system has suffered a number of leaks and problems over the past few years. Could the mains sewer take the proposal without a full system upgrade?
5. Services (Broadband) – Black street broadband service is yet to be upgraded to fibre. Currently not stable or suitable for the existing properties.
6. Services (street lighting) – Black Street has very limited street lighting. Potential issue area should further properties be built with a large increase in people leaving in the area.
7. Service (Kessingland sluice) – The current sluice at Benacre is flood prevention for the river hundred. It is getting closer to the sea due to erosion and if ceases to function in the coming years will result in flooding to marshland around Black street. Further development will also add additional threat to this.
8. Potential Flooding – Properties on the east side of Black street suffer flooding during adverse weather. Should properties be built in proposed area this could result in torrents of water running from the proposed site onto these low lying properties causing further flooding risk.
9. Wind Turbines – Current wind turbines in Kessingland cause shadow flicker at certain times of the year. Properties on the proposed site would be subject to this phenomenon which is a very unpleasant experience. Council are aware and have not addressed this issue since installation of the turbines (have video evidence should you wish to see this!!!)
10. Wildlife – Black street area is a hive of wildlife. The proposed site is home to badgers, owls, deer and a number of bird breeds that are not seen in other local areas. Building on the site would disrupt and potential drive away the wildlife that has been living in this area.
11. Local Amenities (Schools) – Local schools are often oversubscribed and further properties in this area will result in overloads on the local schools causing either overcrowded classes resulting in worse ofsted reports or additional transport costs to less crowded schools around the Lowestoft area (example my daughter was placed in East point academy due to current oversubscription of high schools).
12. Local Amenities (Doctors Surgery) – Kessingland is the local doctors surgery. It is often very difficult to obtain an appointment to see a GP as this is a relatively small surgery. A potential for circa 280 additional people would not be supported by this surgery.
13. Local Amenities (Bus Routes) – No local bus route supporting Black Street. Kessingland is the nearest serviceable bus stop.
14. Local Amenities (Policing) – No local police servicing the area.
15. Local People – Area has a number of elderly people and young children. A number of children walk to the end of the road daily to catch school buses. Lack of paths with increase in road traffic will make this a hazard with potential to cause harm. Likewise elderly people walk to road to meet others and walk to kessingland. They face the same potential to cause harm with increased traffic.



16. Noise – Black street is a very quite rural area. An increase in property will remove this from the current tranquil area and disturb the habitats for the wildlife mentioned above.

With the above points to note I am against the proposal for development.

I believe there are other areas with far safer access and egress that make these a better proposition than the Black Street proposal. The potential to cause harm with increased traffic and cars (potentially circa 140 cars) would render the road a real hazard to all that walk or drive through. A single track lane is not suitable to support an increase in property as per proposal. It must also be noted that Snab Hill is not suitable for 2 cars to pass in certain areas and again is not suitable for an increase in traffic.

I hope the above points will be given serious consideration prior to any further submission proposals.

#### **CM & RG Dexter**

Please find enclosed our appraisal of site option 110 land to the north of black street Gisleham

##### **SMALL PLOT TO NORTH**

Redundant sand pit  
High unsupported sides  
Loose sand bottom  
Access none only by driving on or crossing public footpath  
Wildlife habitat currently supports Badgers  
Footpath currently well used by local villagers  
No reasonable place to divert

##### **LARGER PLOT**

Poor access to site  
Road width at proposed site 16ft  
Limited scope to widen road as several houses built to road edge  
No kerbs for pedestrians and children walking to school bus  
Road width south of site Black Street 12ft max no scope to widen on blind bend with mature oak one side and driveway on other  
Road width north of site Black Street 12ft.max very little scope to widen as houses in that area very close to road  
Road on site frontage at present on medium flood risk [se EA website]  
Site still suffers from noise and strobbing from wind turbines problem still not resolved by W D C despite many complaints

##### **SERVICES**

Sewer system may not coop with an additional 70 houses  
Rapidly floods into gardens on east side of black street following breakdown of pumping system with current numbers  
System at medium risk of flooding from north sea se E A website  
Should Benacre Ness pumping station become breached risk will probably be raised to HIGH

**PUBLIC TRANSPORT** none

**STREET CLEANING** none

**POLICING** rare

**STREET LIGHTING** very poor

##### **OVERALL APPRAISEL OF PROPOSED SITE**

Adding more than double the number of current houses with a potential for 140 more cars using a narrow road no footpaths no public transport and a large increase recently in farm traffic very large tractors on very



narrow road which is so narrow in places two vehicles cannot pass is madness and a great danger to children and parents who currently walk to the school In view of the enclosed points it is our opinion that this site is not suitable for such a large scale development

### **KE Draycott**

I wish to point out several reasons why it would be wrong to build houses on the land here, between Latymere close, Gisleham.

I have lived here for 10 years and experienced the surge, when houses on Black Street were advised of a high risk of flooding, causing panic and worry. The situation would be much worse if, instead of fields, there were roads and houses off Black Street.

The drains and sewers are not adequate as they are and the dam and pumping station between Black Street and the marshes would probably fail.

Black Street is a narrow country lane without pavements, the extra traffic from a large building site and the many cars from the new houses when built would lead to many problems for everyone, including the farmers in the area, with massive tractors and trailers.

There is no gas supply to Black Street, the new development would have to rely on bottled gas, oil or electricity.

There is no bus service here, it is a long way from the shops, school and surgery at Kessingland.

The two massive wind turbines opposite Black Street, at the side of the A12 do not enhance the view. They should not have been built there. Will their presence prevent housing along the A12? If not there are "empty" fields near them where Kessingland could expand.

I hope my comments are noted and stored for future reference.

### **Jason and Peggy Fairweather**

We are concerned about the proposed development 110 Black Street being quite a significant size, doubling the houses down this street. We feel that the infrastructure is insufficient for a development of this size, with poor street lighting and no footpath. We are concerned for our children's safety having to walk down to the end of the street. We believe the road is 12 foot in width at the narrowest part. How would the street cope with extra cars and traffic? The pumping station continues to flood, as well as the main station in Kessingland, which cannot keep up.

### **RP Fiddes**

Reference the proposals of the construction of 70 dwellings in Black Street Gisleham which is a most unsuitable site.

There are several reasons why this proposal is not practical.

1. Black Street is a country lane and is not wide enough for cars to pass each other. It is even more of a problem for lorries and tractors. There is no pavement for pedestrians to walk on.
2. There are no schools in the vicinity.
3. The nearest school is over subscribed.
4. The sewerage system is already under severe pressure without the burden of 70 additional dwellings.



5. There are no shops in the vicinity. On Kessingland High Street there is one general store and one chemist.
6. There is no public transport at all in Black Street The nearest public transport is in Kessingland.
7. The doctors surgery in Kessingland is already stretched.

Additional dwellings would result in over development of a small hamlet. To summarise this must be considered to be a most unsuitable site for development.

### **Bruce and Jenny Francis**

As a resident of Black Street, Gisleham, it has been brought to my attention that you are proposing to initiate the building of approximately 70 homes on the land adjacent to Latymere Close.

I feel it necessary to write to you in this regard as I am concerned the plot and the area you have 'zoned' for this size of development is totally inadequate.

The main points I would think that would deem this plan as totally unacceptable are as follows:

- ▶ Drainage of this size development. What is already in place doesn't cope.
- ▶ Access to the hamlet is extremely narrow - any additional numbers of traffic just wouldn't be possible.
- ▶ Communication links including transport/internet/telephone are already maxed.
- ▶ Potential increase in children. Local schools are already overloaded - we are just trying to get a pre-school place and not succeeding.
- ▶ Major disruption to the local environment for the construction of such a development.

These are to name just a few issues with the proposal. I would strongly recommend a team of knowledgeable and practical persons to simply come and do a 'site visit' as I can promise you it will be very obvious from a simple visit to Black Street that a development of anything over just a handful of properties is absolutely ridiculous and totally detrimental to the whole surrounding area in every way.

For the safety and security of the residents in the Black Street area I would ask you to reconsider.

### **Anthony Gower**

#### **Site 110 – Land to the North of Black Street**

I consider this site unsuitable for housing development, the proposed purpose, and request it is removed from the list of potential land for development.

The site itself is predominantly a gently sloping field, plus a former sand pit. It is bounded to the North by a row of mature trees, and to the South by Black Street, at which point it is roughly 2 metres above street level. At the lower end of this bank there is a small, narrow, and unused access point, current vehicular entry being via the neighbouring field to the North. The field itself is bisected by power lines. I suggest it is the poor access, comparatively small size, and presence of power lines, making it difficult to farm on a desired scale is the reason the owner has proposed it for housing.

Again, at the lowest point(west) it adjoins the boundary of the AONB where the site provides a wildlife



corridor.

It would be difficult to envisage how safe access to the proposed site would be achieved. Black Street is narrow and meandering throughout, and with a considerable number of pinch points. In spite of that it is a thoroughfare, and has been used as a “rat run” on numerous occasions when the A12 has been closed, with chaotic consequences.

There is no gas supply to Black Street, and unlikely ever to be. Many homeowners rely on bulk fuel deliveries (predominantly oil), and it must be assumed that would extend to any future development. For existing properties this often results in the road being blocked during such deliveries, to which should be added refuse collection.

The section of Black Street forming the Southern boundary of the site is currently included in the Flood Warning Area (Flood Zone 3), with sections either side identified at high risk of flooding from surface water, potentially preventing access. The current drainage system struggles to cope with such surface water, yet it would be into that system that any captured water would flow, plus the significantly increased run-off from the proposed site.

Because of its low-lying position Black Street relies on a pumped sewage system, which struggles to cope with existing demand. The pumping station itself is in the flood risk zone, and that risk, and the flooding risk in general, will increase substantially under the current Shoreline Management Plan, i.e. The abandonment of the pumping station at Benacre Ness, allowing the land South of Black Street to become vulnerable to sea ingress.

Two wind turbines sited to the East of Black Street cause considerable problems for existing residents. Waveney DC have failed to tackle many of the issues of concern. The one area of success has been in addressing Shadow Flicker, requiring the turbines to be stopped during times of risk. Residents at the proposed site would encounter the same problems currently experienced, placing more pressure on the Authority, whilst requiring further reduction in the generating potential of the turbines.

Black Street currently has about 40 properties. 70 more would almost treble that figure. In spite of that there are no local facilities, unless you include a postbox, and telephone kiosk (without a phone), and certainly no public transport. It may be in Gisleham, but the nearest facilities are in Kessingland. It is there that residents turn for shops, pubs, doctors, libraries etc. More importantly it is Kessingland that provides primary education for the youngest in society. Although poor, street lighting exists along the route to that local school. A primary school does exist in the parish, but it has now become the replacement for the one in Carlton Colville. Furthermore, it is over 2 miles away, along an unlit country lane.

The proposed development would place further pressure on services in Kessingland, which is already struggling to cope. I find it distasteful and unethical that this proposed development could potentially impact significantly on those local services, without Kessingland Parish Council having any direct involvement. It is worth remembering that it was only a few years ago that proposed boundary changes would have placed Black



Street in Norfolk, but with Kessingand remaining in Suffolk. How this would have affected services for residents was unclear, but it is certain they would not have improved, and there is nothing to say this idea will not rear its head again.

With so few existing properties housing need cannot possibly exist on the scale proposed.

To quote from your document:-

*“In reviewing the Local Plan, we need to consider what villages are the most suitable to accommodate new development over the next 20 years. Some of the things necessary to consider will be, existing settlement size, provision and accessibility to services and facilities, transport infrastructure and housing need. Good transport is key to successful places”*

**The proposed development fails all these tests.**

**In conclusion, Black Street is what it is. It is not perfect. It lacks amenities, maintenance is poor, with overgrown verges, narrow, with poor sight lines. There are no facilities for children, and under constant threat of flooding. It is a rural hamlet of mixed housing capable of satisfying its own needs. The proposed development would quite simply overwhelm it, not only to the detriment of existing residents but also to new arrivals. It would be a recipe for disaster, not a natural one, but one endorsed by the Local Authority. Mitigation would require infrastructure expenditure on a scale out of all proportion, the cost of which would be met from the general public, not the owner or potential developer.**

**The owner may wish to profit from the site but I doubt many developers would be interested. With a view over the marshes of the AONB interest is likely to centre, not on affordable housing on the scale proposed, but on a lower number of up-market properties. That would immediately denigrate the contribution of the site to a new local plan that must have as its premise need not greed.**

**Dean and Julie Hitcham**

I am writing with regards to the potential land for development in Black Street, Gisleham. Ref plot 110 as shown in the ‘New Waveney Local Development Plan’.

Black Street is a small hamlet of around sixty dwellings. The proposal of 70 new homes would more than double the housing in this area.

The road is at best is sixteen feet wide and narrows to around twelve feet at its entrance from Snab Hill to the north. Seventy more houses could bring a hundred or more cars using the road daily as well as extra service vehicles on what is in effect just a narrow country road.

There is little or no scope for widening, no kerbs and no pavements. This makes for hazardous walking, especially for the school children who are required to walk to the end of the road to catch the school bus. Some of the houses are within a couple of feet of the road and a few have had problems with vehicles knocking into them.



The actual site is a good ten feet higher than the road and has been in constant agricultural use for over sixty years. It is currently sown with a crop of rapeseed and certainly not overgrown and unused as stated in your site appraisal document. It would need extensive excavations to prevent new buildings from towering over the existing houses opposite. There is also a row of mature oak trees that could suffer damage as a result of excavations.

Black Street has long suffered from poor sewer and drainage. Surface water and mud run off from the surrounding fields and certain parts of the road are prone to large puddles of water. A raised development would mean more surface water running into the road and onto to the properties opposite.

Houses on the east side of the road are classed by the Environment Agency as being at medium risk from coastal flooding and are built on a designated flood plain. Notice has been given in the past to evacuate during high tidal surges and with current plans not to maintain the pumping station at Benacre, this may become a more frequent event in the future. Flood maps show the road will flood to the north and south of the site completely cutting it off.

Residents of Black Street suffer constant noise from the two wind turbines situated in Kessingland with strobing and shadow flicker being a problem in the winter months. The site lays right in the middle of the area that is worst affected by this. These are issues that are still ongoing and unresolved.

Public services are non-existent, there are no buses, bad street lighting and nominal visible policing. In addition the road is constantly used by heavy farm vehicles and agricultural machinery.

The small site at the top of Sandy Lane is a disused sandpit with a well used public footpath running alongside it and no public right of way access. It is also inhabited by a group of badgers who I believe are protected by an act of law.

I would most earnestly urge you to consider these issues when deciding if this potential site is suitable for development.

#### **peter hunting**

I believe the proposal for 70 dwellings on this site is very inappropriate. There are approximately 55 dwellings in Black St. which have been built intermittently over many years and to suddenly increase this by 70 would profoundly alter the existing community.

Black St. is a very narrow road, making it difficult for vehicles to pass each other. This would be exacerbated with the addition of another 100+ cars

There is no footpath along the road and with another 100+ children needing to walk along it to access school buses, plus the additional traffic, the potential for accidents will be greatly increased.

Since I have lived in Black St. we have experienced problems with sewage backing up, as it has to be pumped up to Kessingland. Another 70 households would make this problem even worse.

These are my main concerns with this proposed site which I think is only suitable for a development of 6-10 dwellings.

#### **S Lincoln**

I am writing to you to express my opposition to the aforementioned proposed development plan announced by the Waveney District Council that includes the potential built of up to 70 houses in the field behind Latymere Close.



I would be grateful if you could give consideration to the following reasons, which in my opinion expose the seriousness of the grievances and dangers that this development will cause, irreversibly, to the community of Black Street.

1. The development will more than double the size of our side of the whole of Black Street in terms of number of properties, and what is worse will at least triplicate the number of residents and cars using the space along our lane. Black Street lane cannot cope with dual traffic, it is a narrow country lane with very few passing places with most houses and gardens flush with the lane. Large vehicles (tractors, trucks, lorries, vans etc) are often halted by cars transiting or parked on the roadside. This development will cause endless chaos and disruption during the construction phase and for the foreseeable future, due to the sudden increase in the number of vehicles using our lane.
2. This development will put the lives of the current residents at risk on a daily basis. There isn't a pavement, or space for one, so pedestrians will have to continue to share the lane with the passing vehicles. The lane is often used by local people of all ages (from very young children to elderly people) to walk to and from Kessingland. Children often play on or near the lane and ride their bicycles and scooters.
3. The main gardens of all of the Latymere Close properties face the lane. This development and the amount of road traffic it will cause will mean we can no longer trust our children or pets to play in our own gardens without constant vigilance.
4. Every single one of the properties in Latymere Close will be left with no privacy whatsoever. All our main gardens are at the front, facing the lane, which currently does not affect the way we enjoy them as there are very few vehicles going by during the day time hours. However, the traffic will be continuous, noisy and unavoidable along the front of our gardens if this development goes ahead. All our houses also have secluded, smaller gardens or patios behind our houses. Needless to say these will no longer be secluded or private any more as they will face straight into the development.
5. The development further will accentuate the risk of flooding in Black Street.
6. I know for a fact that our houses currently attract a substantial premium on top of their standard property market value just because of the quiet location and the unspoilt rural aspect of the village. We will clearly lose a lot of money straight away just by this development being approved. The fact that we will no longer have any privacy in any of our gardens or patios will further reduce the value of our houses, and leave them with very few selling points.
7. The field where the plot is proposed is not at all scrubland, as it has been described somewhere in the Council's report, it is a well-tended, productive crop field surrounded by mature hedges and trees. The views from the back of our houses in Latymere Close, and the front views of all the houses at the other side of the road, are therefore some of the most beautiful prospects of the village. This view will be totally obliterated by the proposed construction. The skyline will be dominated by the new houses, towering over our homes from up the hill.
8. This development will be the end of Black Street as it is. Black Street is a rather unique hamlet in the Gisleham Parish, full of character and heritage. The development will suffocate us, and this will not just be a visual impression. The place will become another suburb: noisy, overcrowded and unattractive.
9. Black Street has the privilege to enjoy a very diverse wildlife, thanks to the abundance of habitats ranging from marshes to meadows and mature trees and thickets. Amongst the animals and birds that we can see around the village there are several key species which deserve protection such as sparrows, cuckoos, thrushes, bats, owls, badgers, deer and hedgehogs. All of this wildlife will doubtlessly suffer, and possibly disappear entirely, should the development go ahead.
10. The developers of the proposed site will have to be very "creative" to sell such high number of houses which will be:
  - ostensibly cramped,
  - isolated at the end of a very narrow road access,



- overlooking the back of a long row of houses (Latymere Close), which is a rather unattractive view, and
- further overlooking, with nothing to obstruct this view, into two huge wind turbines.

11. One can easily realise that in order to sell, the new properties will have to be very affordable, thus unintentionally selecting a range of buyers that could further change the way of life in our village, and not for the better.

**This development is completely unnecessary and disproportionate**

**It will irreversibly perturb the life of a hamlet which is rather unique to the Gisleham Parish, which will cease to exist as we know it**

**It will benefit no one except the landowners selling the field and the developers**

**It will cause most current homeowners along Black Street lose money as their properties devalue**

**It may put lives in danger due to the increase in traffic around Black Street**

**It will cause extensive and permanent damage to the natural habitat and local wildlife, and will accentuate the risk of flooding**

Please, give your utmost consideration to our concerns. Thank you.

**Chris and Elspeth Merren**

I refer to your recent publication "Options for the new Waveney Local Plan" dated April 2016 and, in particular, the proposals for Site Number 110, Land to the north of Black Street, Gisleham. Your proposal states that this land will be suitable for housing development with an indicative number of 70 houses on this site. I would make the following comments on this proposal:

1 Black Street is currently a very rural community with 65 houses. Adding another 70 houses, as indicated in your Local Plan, will result in an additional 140 adults, at least, and potentially 150 or more children. While the overall population of Gisleham is of the order of 780 in some 330 dwellings, Black Street is a separate community with a population of approximately 170 residents. The proposed increase in the number of residents from the new housing development would utterly change - and not necessarily for the better - the character of this community; a consequence you need to address in your deliberations.

2 Black Street is a single carriageway road with no pavements and the children from our community have to walk to the north-eastern end of the street to await their school buses. The increase in traffic during the construction period would bring unacceptable risk of injury or worse to these children as they go to and from school while the construction traffic tries to gain access to the building site. Living at the north-eastern end of Black Street, I can see no easy solution to providing pavements to help segregate pedestrians and traffic. As there is no space available for the provision of pavements, it follows that the risk of serious injury or death to residents from the increased traffic flow would be unacceptably high.

3 The initial impact of this development would be a considerable increase in construction traffic through Black Street. This would include personal transport for the construction workers, delivery vans and lorries, possibly including articulated trucks. While this might be considered a "short term" activity, such activity is likely to take at least 18 months and would seriously affect the safety of pedestrians walking along the verges of the road.

4 I raise a similar concern once all of the 70 new houses are occupied. Public transport is not available within or close to Black Street; consequently, all the new residents would require their own means of transport to get to and from work and to and from the shops. This would result in an additional 100 to 200 cars, maybe more. Again, road safety, especially for pedestrians and cyclists, become an important issue.



5 The street lighting is currently sparse in Black Street. With an increased number of children needing to walk to and from the school bus pick-up and drop-off point, there is increased potential, or injury, especially during hours of reduced visibility and darkness. This is likely to be an issue both during the construction period and once the new occupants have taken up residence. While increased street lighting may reduce the risk of accidents between road traffic and pedestrians, the lack of space available for the construction of pavements remains a prime concern.

6 Black Street is currently a narrow road and the width allows only a single vehicle to pass in a number of places. At present, the road can cope with the current number of motor vehicles that use it. Increasing the number of vehicles that need to gain access to the new houses, as described above, would cause excessive traffic flows and bad feeling among residents, both old and new. It would appear, therefore, that width of Black Street and its lack of pavements will make this new housing development untenable. Should you propose, however, to continue with this housing development, serious attention must be given to the resulting traffic flows in the area.

7 In addition to point 6 above, the traffic flows from the new housing development would need to use the local roads, i.e. the continuation of Black Street to Rushmere, a single track road, the roads to the centre of Gisleham and onwards to Carlton Colville and the road into Mutford, all of which are narrow in places. How would your development plan address the impact of the increase in traffic on these roads and how would you alleviate the congestion which would undoubtedly arise?

8 From the Local Plan, it appears that Sandy Lane would be one of the main access roads to the new development. Currently, this is a single track, un-adopted road with no space for pavements. While another access point is clearly visible on the plans, please will you explain how Sandy Lane would be made suitable for a significant increase of traffic to and from the new housing area.

9 Given the increase in private vehicles that will be required by the new residents, as detailed in point 3 above, the issue arises about off-street parking for these additional vehicles. All of the houses in Black Street currently have facilities for off-street parking. I have noticed that many of the new housing developments in and around Lowestoft do not have sufficient off-street parking areas with the result that cars are parked on pavements and roads, leading to congestion and frustration for residents. In the Village Profile for Gisleham, I notice that the number of cars per dwelling is 1.5, while the similar figure for adjacent parishes can be as high as 1.7. Given the lack of Public Transport facilities in Black Street, will you explain how the anticipated number of cars per dwelling will be determined for this new development and how, as a minimum, this number of vehicles will be accommodated in off-street parking?

10 I now come on to the issues associated with the provision of housing services, water, sewerage, electrical power and telephone and internet connections. Please advise how a doubling of water demand from the new housing development will be addressed. The current piping system is suitable for the 65 houses currently in Black Street, but would certainly be insufficient for an additional 70 houses. Also, the current sewerage facilities are almost at full capacity. There have been several occasions when the main sewer in Black Street has become blocked with waste water filling up the sewer upstream of the blockage and resulting in foul water discharging from manholes and open drains and even into household toilets. In addition, the capacity of the sewerage pumping station in Black Street is at its limit, as is the capacity of the Kessingland Sewerage Works, to which the sewage is pumped. Have the costs for increasing the capacity of these vital systems has been included in your estimates for the additional 70 houses?

11 I am not aware of any current problems with the supply of electrical power to the properties in Black Street, nor with the provision of telecommunications and internet connections. Doubling the demand for these services, however, is likely to bring a reduction in capacity to the existing residents. Please explain how these services will be maintained without unacceptable loss of voltage or reduction in speed of internet connections should the new housing development be approved.

12 With the new housing development being proposed on land that is higher than Black Street itself, there is increased likelihood that, during or following a heavy rain storm, the rainwater run-off from the new housing



development will run into Black Street and cause flooding to existing low-lying houses. This happened in 1995. With the new housing development occupying land that would otherwise absorb rainfall, increased rainwater run-off will occur with a significantly increased risk of flooding; a major concern for the current residents. This, clearly, is not acceptable. Therefore, please advise whether plans and costs for the installation and maintenance of a rainwater run-off catchment system has been included in your estimates.

Given the above concerns, it is clear to me that the proposed housing development for Black Street Gisleham should not be considered further; there are many other areas identified within the Local Development Plan that can more easily accommodate new housing. I am of the opinion that the overall impact of the new housing proposal to be unsafe for the existing and new residents and therefore should not be considered further.

### **Rosemary Moffatt**

This proposal is totally unsuitable for Black Street for the following reasons.

1. Black Street is a very narrow, country road which narrows even more towards Henstead and Rushmere. There are several 'pinch points' at the entrance from Snab Hill.
2. It is on the Environmental Agency website as med. to high risk of flooding. This will only increase if Benacre Sluice eventually fails.
3. The pumping station would be unable to cope. It often fails now with resulting sewerage on my patio.
4. Drainage from site would cross Black Street and flood houses.
5. No local services or facilities – Carlton Colville School is already causing enormous traffic problems and more children would only increase the blockages of the roads.
6. Doctors surgery in Kessingland is already struggling to cope – it is difficult enough to get an appointment now.
7. No public transport.
8. Sandy Lane is not an access – it is a footpath and the sand pit has badgers living around it. It is single track only.

The proposal of 70 houses would more than double the number of houses in Black Street. This is a hamlet and this is overdevelopment which will ruin the main reasons the present inhabitants have chosen to live here – peace and quiet.

I strongly oppose this plan.

### **Mr A Mower**

I object strongly to the proposal to build houses on land in Black St. Most of Black St is only suitable for single land traffic, there is no room for widening of the road as several of the houses are on the edge of the road, there are no pavements, and no room to add any for the extra people (children going to school). Schooling in the area is already a problem with traffic. The sand pit at the top of Latimer Rd has an active badgers set. The road was never there to cope with the amount of traffic that would be created by the amount of lorries and vehicles where the buildings are going up, then 70 houses averaging 2 cars per family.

### **Jamie O'Keefe**

I am writing to you concerning the proposed development of Black Street, Gisleham with an extension of upwards of 70 new properties, I want to register my opposition to this proposal, as I feel the size of the development is unsustainable given the very limited access to the site from both Latimer Drive and Sandy Lane. Neither route offers sufficient access to any substantial increase in road traffic, being far too narrow and in Sandy Lane's case in particular cluttered with parked vehicles to permit an increase in what already passes



along these routes, I feel it would substantially degrade the quality of life of the residents and pose a risk to residents safety as there are no foot paths currently available and no space to add them.

I also feel that the proposed development would significantly increase the risk of flooding in the village due to water run off from what is a sloping site that would if built upon lack the natural soak away property's of open ground, we already have a flooding problem in the lower village and fields.

Further the current amenities, facilities and services, such as sewerage in the village and surrounding area would not support a major increase in the local population

I would also like to draw your attention to the fact the smaller plot identified at the end of Sandy Lane, apart from having even less suitable access than Latimer Drive is also the site of a very extensive and well developed Badger set as well as refuge and habitat for many species

I therefore do not feel this is an appropriate site for development due to poor access, flooding problems, lack of facilities and the environmental damage that would be incurred.

### **Beverley O'Keefe**

Regarding the above proposal, I wish to forward my views on why they should not be built on this site.

1. Black Street is in a designated area of flood risk. When we do get heavy rain the water very soon blocks drain and rushes down Sandy Lane depositing the silt and debris at the bottom and soon blocks drainage.
2. The services and facilities are already overloaded and wouldn't be able to cope ie sewage mainly.
3. Accessibility – these lanes are very narrow - with the house walls directly on the road. This is an agricultural area where lorries and tractors are rushing along Black Street constantly. The vehicles needed to build these homes along with possibly as many as a 100 more cars would not only be hazardous, but also cause pollution and danger to the houses and residents. The children who attend the Lemn School walk daily to and fro to the bus on the road, there are no footpaths. There have already been 'near misses' as the modern driver does not drive too carefully!
4. Sandy Lane, off Black Street, is an unadopted lane one way with an ex-sandpit at the top. The lane itself is so narrow that 2 cars cannot pass and when it rains the water and debris pours down, again, blocking the drain. The sandpit itself is home to a large badger sett. Badgers are protected mammals and should not be disturbed. There are also owls, foxes and muntjacs in the vicinity. I have informed Suffolk Wildlife Society of the sett.
5. Facilities and services – we have little here but the basics, no bus service, and after having suffered months putting up with erection, road closure etc whilst the wind turbine were erected. The homeowners especially in Latymere (ex-council) would be open to water and pollution from these houses as Latymere is below the field.

Of course our properties would drop in value, which would be obvious, through no fault of ours.

New houses should be built on brownfield sites such as Ellough airfield, where the main road through to Beccles and the A12 is comparatively wide and accessible compared to Black Street, which is narrow and windy and has only the Rushmere village one end and the Snab Hill the other.

I conclude with the main points against: flooding, accessibility, safety with pollution caused by cars etc., services (sewage), and Sandy Lane Badger sett (protected species).

### **John and Terry Payne**

We would like to make the following observations concerning the possible construction of up to 70 new houses on this site.

If this number of new homes were built here it would double the number of existing homes presently in Black Street.



At least a further hundred plus vehicles would then be having to leave and enter Black Street. At the moment most vehicles enter and exit through the Eastern end of Black Street, which at one point is only single track. The other end of Black Street, towards Rushmere, is a single track lane for a mile. Many farm vehicles also use this lane which can cause difficulties when vehicles have to back to find the very few suitable places where vehicles are able to pass each other.

The whole infrastructure of the local area is not designed for large numbers of extra people and vehicles.

Therefore we are opposed to the building of more homes in Black Street and urge you to consider our observations.

**JE Phillips**

I'm writing to oppose against the plan to build 70 houses at the back of Latimer Close. The start with Black Street isn't wide enough to take the traffic. The sewer isn't large enough. Black Street is now in a flood plane also I wouldn't have thought you could drive across the footpaths to get to the 2 houses in the sand pit.

**G.M. Phillips**

I am objecting to the plans to build houses in black street and up sandy lane Gisleham .The reasons are Black street can not handle the increase in traffic the sewage system would not handle it .Its in a flood plain already also there are badges in the sand pit at the top of sandy lane.Also public transport is non existent over crowding at the local school and doctors to name a few.

**Bruce Provan**

Gisleham is a relatively small settlement which would be swamped with a development like this. The roads are also inadequate.

**Barry Roberts**

I am writing to stress my objection on your proposals to erect 70 homes at the rear of Latymere Close Black Street.

This idea would be ludicrous as it's not fitting with the semi rural location, one of the few remaining hamlets in this area.

Concerns also regarding wildlife, flooding, scenery, peacefulness and basically damaging an untouched surroundings.

This is why the current residents chose to live here, and your proposal would create an urban feel to the area, and make it just like many other areas.

Lets not damage our little hamlets.

**S Rock**

I strongly object to the absurd (potential) housing development on the back of Latymere Close, Gisleham.

I am saddened by the continuous 'carving up' of our beautiful countryside. People need to stop overbreeding



and overpopulating! Black Street is in an idyllic small lane. Please let's keep it that way.

There is no gas, no suitable road access and no need to destroy the peaceful lives of the of the hard working residents and pensioners who live here.

Please think about our mature trees, our lush landscapes and views. Protect our wildlife here. Please look after our rural setting and not build concrete houses etc. here, which will blight our neighbourhood.

### **Mr & Mrs R Sharp**

We understand that there could be a proposed building site for at least 70 properties on the land behind and adjacent to Latymere close.

We would therefore like to oppose this possibility for the following reasons.

The first site being a smaller one at present allows access to a well used footpath and has lots of wildlife etc.

The large proposed site where I gather the majority of the building would be is off a very narrow lane, with no kerbs or footpaths, at present it is used by children getting to school, locals walking their dogs etc. Black street as you should be aware is also under a flood plain from both sea water and rain water, for example everytime it rains we have a small lake outside our property stretching across the whole of the front, despite this being reported nothing has been or will be done, we have been told it will be kept an eye on. Our sewers would be unable to cope with extra housing, we have no public transport, very minimal street lighting, local schools and doctors services would struggle to cope.

It has to be realised that for a development of 70 houses and developers are well known to get more than said on a site, this would involve at least 140 extra cars and possibly more all using a narrow road, with corners and bends that are very tight and hard to see round, a road or lane that has minimal passing places therefore possible congestion will occur, possible accidents from locals and children walking along it to get to school or to the nearest public transport which is found at kessingland it would be a development that could and probably would in the near future with climate change and ongoing cuts, cause problems with flooding, excess sewage etc. For a small hamlet that at present is coping a new development would add to problems that no need be added to. Therefore We hope you will listen before agreeing to any proposed new development being built in what could be a vulnerable area.

### **Ruth Smith**

I write to protest against the above proposed development. I am alarmed to hear – not by any notice from your department – but from fellow local residents – that a plan has been submitted to build 70 houses on this greenfield site of productive farmland and marginal land. As you are no doubt aware, Black Street is an ancient winding rural lane, with a small community of mixed age homes. An additional 70 dwellings would more than double the number and is out of all proportion with both the site and the community. Our road is narrow, with no footpath and for much of its length only passable by one vehicle at a time and simply not adequate for potentially 140 more cars, let alone visitors or vans of trades folk. (In my experience modern developers leave not an inch of surplus space for visitors or trades). Situated as we are at a little distance from amenities – schools, dentists, employment, shops, buses, leisure centres – amenities which would struggle locally to accommodate such an increase in population – it is inevitable that these many daily treks would be by car. I would also remind you that the existing homes are right down at sea level. Some houses have suffered flooding both by run-off from the field behind Latymere Close – proposed to be built over, and from bricking up of sewers. Development is likely to worsen this for the existing homes.

It is my understanding that the current land owner of site 110 has also applied to build 970 new houses plus amenities on land at Ellough, only 5.5 miles away. With such a huge number of better served homes to be built so near I question the need to cram so many more into the site at Black Street. We often hear politicians



spouting the terrifyingly unsustainable need to build 6 houses a minute to keep up with demand. I would argue that despite years of massive scale development houses only become more and more unaffordable, there is a lack of good secure jobs locally and big development schemes are part of an untenable over blown bubble driven by incomes and landlords. No help to local families first time buying. While there are houses standing empty – one indeed along Black Street – or brown field sites which could be brought into use, green field sites should not be allowed to be destroyed. Because the space for food production, air to breathe and wildlife to thrive are as essential for human well being as is housing. More so.

As an aside we do not yet know the result of the EU referendum. If the electorate vote out, net immigration may fall, the economy may dip and the alleged 'need' to build at such a rate at any cost may prove to be unnecessary. It is also my heart-sinking understanding that in matter of planning there seems to be no right to a view. This is law being an ass perverse state of affairs. When a long established community values and has chosen to live in a place because of its beauty, peacefulness and space, perhaps made sacrifices or paid a premium to be able to live there, then their right to continue to live as they have chosen should be strongly considered. It is easy to dismiss us as Nimbys. But if this was your backyard – if you were to spend a little time here to hear the birdsong, the woodpecker, the tawny owl, have a muntjack or a badger cross your path, watch the bats chasing moths or the barn owl sweep silently by, spot butterflies, bees, dragonflies and the countless beetles and bugs all essential to the ecosystem and agriculture – you would want to protect it too. Indeed you would feel it was your duty. In fact – as controllers of planning and development and public servants it is your duty to protect it, from the ugly, the inappropriate, the obtrusive, the shoddy and downright greedy corruption of both built up and rural environments by developers.

Because that is what we get imposed, time after time, field after field. And with this encroachment as a precedent where will end if this field goes? Unless you step in to curtail the outrageous over development I know what we can expect. Yet another soul-less Badger Persimmon dull build, 'accidental' slips of the chainsaw on even the most legally preservation ordered tree, a claustrophobic labyrinth of ticky tacky card board boxes, no sense of architectural vernacular, higgledy piggledy scattered to squeeze in 70 plots so all are overlooked and overlooking all supposedly 'detached' to wring every last pound from each plot but so cramped together and deprived of outside space that there is no light, no privacy, no room to play, kick a ball, grow some veg or a decent tree, have hobbies or friends to visit – the stuff of life. So increasingly obese occupants end up confined to quarters, glued to screens and gadgets for entertainment and getting fatter. Or children wandering feral in the streets beyond to escape. Not right. I do realise that time turns, the population grows, change happens and builders need jobs too so some development must be passed. But in this case an appropriate and proportionate scheme would be more like 12 homes. I can see that to build between Century House and number 12 Latymere Close is infill and it would comfortably take 3 blocks of 4 – mirroring the established 12 properties of Latymere Close which were built well by the local authority and enough space for a rural modest family to park their vehicles, have a tool shed, plant a vegetable patch and dry the washing naturally and not have for a view next door's backdoor. 12 houses would not overwhelm this small community with traffic or place unabsorbable strain on limited local amenities. The new houses could be set back from the road in a similar line to the Latymere Terraces and in this way would not be so imposing in the space or so obtrusive on the houses opposite on Black Street. The number of houses you permit will determine the price of the land. To allow massive dense development will only drive up land prices and tempt farmers to sell productive land for more horrible housing. Even allowing 12 on the lower part of the site will allow the farmer to get his money and perhaps a smaller scale local builder to make their profit. This would be a responsible plan to pass. I would still be sad the space lost – builders do not tread gently and building work is pretty catastrophic generally. But please let it be a short term disturbance not a permanent catastrophe. (Better still – it would make a beautiful place for a woodland burial ground, especially with the new crematorium between Hulver and Ellough only ten minutes away).

Please consider the view I have expressed and those of my neighbours which I know to be in same vein.

**Brian Soloman**

This Site is not suitable for 70 properties because of access roads which are too narrow for the increased traffic levels that would be generated. The services, sewerage and water would be seriously stretched; local services



such as schools and medical facilities are already inadequate and the increased population would severely affect this small rural hamlet.

I would have no objection to a much smaller development on the land between Century House and Latymer Close, say ten properties as "infill" development.

Black street suffers greatly when major accidents occur on the A12 which necessitates using the road as a diversion and residents have great difficulty in using the road when Dustcarts, tractors, tankers and delivery lorries are around. This gives an idea of what it would be like to have 70 new properties in this country hamlet. I would respectfully suggest other sites may be more suitable.

#### **Mr & Mrs M Thompson**

We are writing to object to the above planning application. Gisleham is a very small village; this development would double the size of the existing village causing problems with an increase in traffic on a road that is too narrow for two cars to pass. Widening the road is not an option because several houses are built near the road edge.

There are no pavements along Black Street making it very dangerous for pedestrians, especially children, and again there is nowhere to put a pavement.

The sewers would almost certainly not be able to cope with such a large influx of houses.

The extra hard surfaces would also lead to flooding which is already a problem when there is torrential rain.

The development proposal is out of character with the rest of the village and therefore not acceptable.

We trust that you will strongly consider the points we have raised above, and agree that this proposed development is not appropriate.

#### **Mrs T and A Thrower**

We are voicing our concerns against the proposal of seventy houses at the back of Latymer Close / Sandy Lane Gisleham.

Flooding has been a big concern, as we became flooded a few years ago. Due to heavy rain bringing water, sand and mud from the back field and into our property.

We feel if houses were built on the proposed plot, water would have nowhere to go, but straight down into our property causing damage.

Due to Government, 35% has to be housing association when building new properties, which may result in crime issues.

To add to this, noise levels would go up.

Black Street is an extremely narrow road with only very few passing places, and with no way of widening the road.

We feel more houses would create so much more traffic, and pedestrians.

As the road is already narrow, there is now way to lay a footpath.



With the amount of vehicles we already have coming into our road, safety is paramount.

We have children walking along the path to catch the bus, residents cycling, walking dogs and some elderly who do not possess a car have no choice, other than to walk down our narrow road.

To add an extra 140 cars (2 approximately per house), would cause catastrophic danger, to all involved.

Gisleham has no gas connection.

Apart from a church and a small village hut, Gisleham does not have the amenities to cater for seventy houses. The local primary school (Carlton Colville, with ongoing road issues at present), and Kessingland our neighbouring village itself, is at full capacity, due to housing development in recent years. To add to this, our local police station which was based at Kessingland has since been turned into residential accommodation.

The proposed plot at the back of our property comprises of a row of over a hundred year old oak trees. The grounds these trees stand on, are habitats to all types of birds, including birds of prey, animals including badgers and many varieties of insects.

To build on this land would have a major devastating impact on conservation.

### **Mr & Mrs Truman**

We do not think that the above potential site is at all suitable for development, in our view, having lived here for 14 years.

Gisleham has no services, we all rely on Kessingland for everything. (no shops, buses, doctors, etc.)

As the houses would over double in one go services would very unlikely be unable to cope. Local schools would have to cope with 100+ extra children, some going by car and school bus to Carlton Colville which already has bad parking problems.

Road very unsuitable for children. School bus to Carlton Colville at the end of Black St. All children would have to walk along narrow dangerous road to bus stop and back.

Extra 150 + cars going through narrow village. We already have a problem with tractors, large container lorries any many tankers going up and down our narrow road to Farm quite fast.

Hard sometimes to turn left into Black Street from Snab Hill with amount of cars and larger vehicles coming out of black Street. Entrance to Black Street so narrow you cannot pass so you are continually backing out to let cars out. So what will happen when we get all these extra cars in and out. Plus all these extra houses will have visitors that cannot park in Black Street. Where do all these cars go?

All cars from new development would have to come out of 1 entrance onto narrow road with no pavements and people (including children) will be walking up and down.

Our sewerage system has a problem to serve the 60 houses here already, there has been problems in the past. How would it suddenly cope with 70 more? Sewerage system has a medium risk of flooding.

Our houses (we live opposite the potential site) would be well below the houses built opposite. At present if we have a deluge of rain the water soaks into the ground. If the ground is concreted over where does the extra water go as we are lower down. Also we are on a medium risk of flooding to the roads edge which would be the edge of a new development. Since we have lived here we have had quite a few flood warnings.

Also we have a bad problems with the turbines we seem to have been left with. There is bad strobing at times form the sun, which goes right across the potential site and the noise at times can be unbearable. Another



complaint to the Council!

Cannot see how this small village with narrow roads, inadequate sewerage system, poor lighting, heavy traffic already with Farm vehicles and no pavement deal with double the quantity of houses.

This quite honestly, in our opinion, would be an overdevelopment in a small village, which would certainly not cope with this large amount of new houses. It would have a really drastic impact in the village.

#### **T & J Websdale**

I have been a resident of Black St for twenty years and I am writing to object to the potential land for development in Black St Gisleham.

I am greatly concerned that if the proposal goes ahead it will have a significant detrimental affect on the village.

The proposal for development should be rejected on the following grounds:

I believe there are 60 houses in our village and 70 houses would double the size of the village and the amount of cars travelling up and down would result in unsafe conditions on the narrow road as there are no pavements and the road couldn't be widened and pedestrians and the school children would be at risk.

The inadequacy of the infrastructure of the water sewerage system would not cope as the road is prone to flooding at present, and the sewerage has flooded in the past.

Part of the proposed site covers an old sand pit which is home to various wildlife including badgers and all this would be lost.

There is no bus service in the village and most definitely no room for buses to travel along the narrow road should a service be introduced.

This proposal needs to be rejected for the safety of our village.

#### **Mr & Mrs Wigg**

We wish to make you aware of the strong objections that we have with regards to the potential development above. As a resident of Black Street this scheme will have a serious impact on our village the specific objections are as follows.

Proposed 70 houses will double the size of the village this would cause traffic mayhem with a possibility of 140 cars (plus) in a very rural narrow road as widening the road is not possible. Local children walk to the school bus stop with more houses cars children, walking cycling with no pavements it wouldn't be long for an accident to happen. The plan is on a moderate risk flood plain which slopes down to a high risk flood plan. The village is at the bottom of two hills and the amount of water after a heavy rain that runs down the street is quite considerable flooding has happened in the past.

On numerous occasions the sewerage system has been unable to cope with the village of its present size so more house would increase the problems.

The proposed site is ill considered as it crosses a footpath used by villagers to walk, take their dogs and enjoy the countryside.

The corner of the site is an old sand pit which is home to various types of wildlife including badgers this would all be lost.

As there is no bus service or village shop more cars would be used to travel to shops etc in Kessingland and Lowestoft.

We would be grateful if our objections are taken into consideration when deciding this potential application.



**Mr G & Mrs M Woodrow**

We are residents of Black Street and have grave concerns regarding the land identified on your plan for potential development of 70 houses. We would like to bring to your attention our concerns so that you will take them in to consideration when deciding which land is suitable for potential development.

We summarise our concerns below:-

Black Street is a very narrow road and is not wide enough for two cars to pass. It is necessary for one vehicle to pull over (if possible) or to reverse to the closest passing place. As Black Street has no gas supply, it is a regular occurrence for oil tankers to deliver oil to the residents. Obviously if there is insufficient space for two vehicles to pass, when an oil tanker is making a delivery it is impossible to pass. Recently an ambulance was called to the house opposite and no vehicles could pass for the 40 minutes the ambulance was parked outside the property while the paramedics dealt with the medical emergency. The increase of vehicles as a result of such a large development will only make a bad situation worse.

There is no public transport to Black Street.

The land identified for the proposed development is on much higher land than the current houses in Black Street. We are concerned where any excess surface water will go when we have heavy rain. My property has been flooded because of heavy rain.

To the rear of the houses along Black Street is marsh land which floods to such an extent that we have seen windsurfers on the water which covers the fields!

We are concerned that the wildlife will suffer should the development go ahead.

Please record my comments as part of your consultation process.

**Dave Woods**

I am very concerned about the proposal to site a possible 70 houses on site 110. Several issues.

Currently the road is very narrow and has no pavements, this road already provides access for the 60 houses of Black street and can be hazardous to pedestrians, dog walkers and children walking to and from school (or to the bus pick up point on Snab hill. More houses means more traffic, more walkers and more children NOT GOOD! It wont be long before someone gets hurt.

Street lighting in the area is at best very poor.

The area on the opposite side of Black street already has issue with excess water and drainage systems that are unable to cope, having a concrete jungle of houses will only make matters worse, following heavy rain all that surface water has to go somewhere and unless dramatic changes to Black street drainage and of course Kessingland reception/drainage the original houses will no doubt have flooding issues.

There are no services in black street, no shops or amenities of any sort, All our services come from Kessingland. People will tend to use cars just to use these amenities which will of course cause a black street to become a busy access road, as previously stated due to the width and lack of pavement/curbs etc of the road this will become a hazardous route for pedestrians.

I am sure there are some wildlife issues here too but as yet I need to find out.



Regards,

Dave Woods & Hayley Comer.

### **Gisleham Parish Council (E Rivett)**

Following an open meeting held by Gisleham Parish Council on Tuesday 24 May, Councillors would like to make the following observations and objections to the possible allocation of land for the development of 70 dwellings at the above sites. It is our opinion that, should this development be approved in its current form, the proposed scale of the development would totally alter the rural character of Black Street. Currently there are 62 properties; to add 70 further properties would more than double the population and take away the peaceful atmosphere of this rural area. It would also exacerbate the current problems in Black Street listed below

1) ROAD - The road width at the proposed possible entrance to the site is 4.8 m which is barely wide enough to allow two cars to pass safely notwithstanding the regular use of the road by large farm traffic; refuse and delivery vehicles and horse riders. There is no space for widening the road because of adjacent front gardens, driveways and hedgerows. A number of properties on Black Street front directly onto the road and do not have the benefit of front gardens as a buffer zone.

2) FOOTPATH - There are no footpaths along the road and no space to create any. Pedestrians have to walk along this very narrow road when leaving the village. It is therefore of huge concern that their safety will be greatly endangered, particularly taking into consideration the use of the road by the construction traffic and the vastly increased local traffic should these 70 dwellings be constructed

3) FLOODING - Black Street has been subject to surface water flooding several times over the last few years. Bearing in mind climate change with the resultant heavy rains, the road is likely to be flooded on a more frequent basis. It is noted that the proposed site slopes toward the road and, therefore, any surface water will run down to the road causing widespread water on the road which is likely to result in water damage and disruption to properties on the eastern side of the carriageway. Latymere Close properties will also suffer from surface water run off from the proposed site

4) SEWERAGE - The existing sewerage system is struggling at present to cope with the current demands and it is probable that it would be totally inadequate for a new upgrade on this site without a very expensive upgrade. The existing pumping station is already working to full capacity and would also struggle to handle any further development. The existing system has suffered blockages in recent years, which has resulted in sewage leaking from various inspection chambers.

5) INFRASTRUCTURE - There is no public transport and no local shopping facility within the Black Street area and we feel that this would inevitably increase the amount of traffic using the road. The school at Kessingland which is now an Academy currently has 247 pupils. Parking at this location is very limited and could become more of a problem to the local community with a significant rise in pupils. If some parents decide to send their children to Carlton Colville Primary School which is near capacity now, this will cause even more problems with the severe issues of car parking that are currently being experienced. The GP surgery would have to cope with 150 or more new patients. In our opinion this would not be acceptable for the existing number of GP's and the size of surgery or location where parking is already quite difficult.

6) ENVIRONMENT - We estimate that the construction period for a development of this size would be somewhere in the region of 18 months. Bearing in mind our earlier comments it is felt this is totally unacceptable in a rural area; including the inevitable damage that it could cause to the environment and the existing road surface. There will also be a significant impact to local residents from noise pollution created by the various contractors and increased traffic.

6) LIGHTING - The current street lighting along Black Street is adequate for the existing residents and its rural location but would not be suitable for a larger population. However, should this be increased to cater for a



new development of this size there is the likelihood that it would create environmental problems with a significant increase in light pollution. Additional lighting on the site would also exacerbate any light pollution in this rural setting.

7) SMALLER SITE OFF SANDY LANE - this small site has no adequate access and is a disused sand pit and a natural habitat for various types of wildlife including a population of badgers. In view of this, we are strongly against any development of this area and feel it should be left for this purpose.

In view of the foregoing, Councillors request that these objections are very carefully considered and taken into account when this parcel of land comes before your department for consideration.

Please do not hesitate to contact us should wish any further clarification on the points raised.

#### **Historic England (Debbie Mack)**

Rookery Farm grade II listed farmhouse approximately 200 metre to west. Potential impact upon setting of Listed building.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 110 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, site 110 may contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that it may have.

### **111 - Land to the north of the A146 Beccles Road, Lowestoft**

#### **Anonymous**

I wish to draw your attention to the fact that Waveney District Council, in its new Local Plan for the District, have indicated that land to the north of the A146 Beccles Road in South Oulton Broad is potentially earmarked for development. These areas - marked 111, 112 and 7 on their interactive map - are hard up against the boundary of the Broads National Park and Carlton Marshes and as a result seem wholly unsuitable for building. The areas are currently green fields which form a barrier between the housing to the south of the Beccles Road and the marshes and broad. Any development here would be visible from the Broads National Park from the Carlton Marshes right along to Nicholas Everitt Park in Oulton Broad itself. Properties on the north side of Oulton Broad would also see the housing along with boat users, walkers and other broad users. Many species of wildlife would be disturbed and misplaced should any development take place, and we have regularly seen barn owls hunting in the areas outlined. We feel the Carlton Marshes and Southern Broads would be severely compromised with housing hard up against the park boundary and another wilderness area would be lost forever. Surely there are enough brownfield sites in Lowestoft to develop? The scale of the planned housing is also frightening; 37 houses on plot 111 which will go nowhere to solving any shortage - and a staggering 760 in area 7, which will create a village on top of the marshes. As family members of Suffolk Wildlife Trust, we have contacted them with the proposals of which they are aware and are currently preparing a response. We would



implore you to investigate this matter urgently as well and if you require any further information from us please do not hesitate to contact us.

**Martin Fiddes**

This area is completely unsuitable for new housing as the surrounding road system and main access road - the A146 - is already running at more than capacity, which is clear from the regular tailbacks which stretch from Oulton Broad right back to Hollow Grove Way. The site also backs on to the Broads National Park and Carlton Marshes, managed by the Suffolk Wildlife Trust, and they are very unlikely to allow development to take place right up to their boundary. The area is also home to many species of wildlife - including nesting barn owls - which would clearly be disturbed.

Surely it makes sense to look at developing brownfield sites and there are plenty of ex-industrial areas in the Lowestoft area which should be considered and used before contemplating using greenfield areas?

I also note there are very few areas around Southwold and Reydon marked as suitable for development?

**Martin Fiddes**

Further to my previous comment; any development here would be visible from the Broads National Park from the Carlton Marshes right along to Nicholas Everitt Park in Oulton Broad itself. Properties on the north side of Oulton Broad would also see the housing along with boat users, walkers and other broad users. Many species of wildlife would be disturbed and misplaced should any development take place.

**Andrew Hughes**

This development would impinge visually on the Suffolk Wildlife land and the marshland beyond. Traffic from it would add further pressure to Beccles Road and traffic travelling North from the development would naturally go via the Oulton Broad crossing rather than the new third crossing which would add to the traffic problems in Oulton Broad. It would also add pressure to existing health and education services which are already stretched.

**S Lineham**

This land is not suitable for development. It provides an open vista towards Oulton Broad, which is important for the local landscape. It is used by gulls, barn owls, deer and foxes and provides a buffer between houses and the nature reserve and Broads National Park.

Beccles Road is already overwhelmed by traffic and is often queued up to the Crown roundabout in the direction of Oulton Broad, Traffic is also heavy in the other direction and queues during peak times around the Barnby bends. The A146 cannot absorb this extra traffic in either direction, and there is not enough employment in Lowestoft and local area so people will need to travel for work. There is not the capacity in local health services or schools either.

The increased number of people in the immediate vicinity will be highly likely have an adverse impact on nearby Carlton Marshes nature reserve which includes an SSSI. Already there are problems with dogs off leads and fouling, and also antisocial behaviour which is likely to increase with higher volumes of people.

Drainage water could cause pollution in the marshes further down the hill and adversely affect septic tank drainage of properties including the education centre for the wildlife trust,



### **Broads Authority (Natalie Beal)**

Sites 7 /112 /111 – These lie along the Broads boundary albeit separated by the railway line. Potential for impacts on Landscape character (LCA6) and visual amenity. This would extend the urban boundary of Lowestoft towards the Broads area. Certainly there are likely to be additional recreational pressures as a result of housing development in the area. The Suffolk wildlife Trust and the Carlton marshes reserve lie in close proximity. Housing development at this locating could also create additional land use pressures on fields and grazing marsh in close proximity as residents may seek land for other activities such as allotments, horse grazing etc.<sup>1</sup>

### **Carlton Colville Town Council (Christine Sayer)**

The Areas 7 and 112 and 111 west of Beccles Road should be kept clear of additional development in order to preserve the wild life of the marshes.

### **NorCas**

I do not think this will be a good site for housing. It open countryside with views and access to the river valley. Visually and aesthetically destructible.

### **Suffolk Wildlife Trust (James Meyer)**

Sites 7; 11 and 112 are adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI), these sites are of national and international nature conservation value and a large part of them is owned and managed by Suffolk Wildlife Trust as part of our Carlton and Oulton Marshes reserve. Development in this location appears likely to risk an adverse impact on these sites. The sites may also have ecological value in their own right. For these reasons we would object to their allocation for development.

## **112 - Land to the north of the A146 Beccles Road (2), Lowestoft**

### **Anonymous**

I wish to draw your attention to the fact that Waveney District Council, in its new Local Plan for the District, have indicated that land to the north of the A146 Beccles Road in South Oulton Broad is potentially earmarked for development. These areas - marked 111, 112 and 7 on their interactive map - are hard up against the boundary of the Broads National Park and Carlton Marshes and as a result seem wholly unsuitable for building. The areas are currently green fields which form a barrier between the housing to the south of the Beccles Road and the marshes and broad. Any development here would be visible from the Broads National Park from the Carlton Marshes right along to Nicholas Everitt Park in Oulton Broad itself. Properties on the north side of Oulton Broad would also see the housing along with boat users, walkers and other broad users. Many species of wildlife would be disturbed and misplaced should any development take place, and we have regularly seen barn owls hunting in the areas outlined. We feel the Carlton Marshes and Southern Broads would be severely compromised with housing hard up against the park boundary and another wilderness area would be lost forever. Surely there are enough brownfield sites in Lowestoft to develop? The scale of the planned housing is also frightening; 37 houses on plot 111 which will go nowhere to solving any shortage - and a staggering 760 in area 7, which will create a village on top of the marshes. As family members of Suffolk Wildlife Trust, we have



contacted them with the proposals of which they are aware and are currently preparing a response. We would implore you to investigate this matter urgently as well and if you require any further information from us please do not hesitate to contact us.

### **Martin Fiddes**

Completely unsuitable, the low number of houses (101) coupled with the 37 indicated for the neighbouring area marked 111 (37 houses) will go nowhere to solving the shortage but will put a unfeasibly large number of cars onto an already congested road. Can you imagine trying to turn right onto the Beccles Road in rush hour?!

### **Matthew Gooch**

The development of a large number of housing here will put extreme pressure on Carlton Marshes Nature Reserve and the SSSI designations on it which at present suffer from a wildlife disturbance and site misuse point of view.

A further few hundred houses here will mean an increase in dogs walkers using the site and people that the very sensitive condition of the the habitats that are classed as some of the best of their type in the uk will not sustain without major detriment to an area of much enjoyment for the 70,000 people already living in the town. And instead of putting pressure on the nature reserves doorstep we should consider protecting this area for many years to come for the use and pleasure of the people already living in the local area and beyond.

Pressure will increase on wildlife from disturbance an issue that nature conservation struggles with now and the risk here of increased poor quality water ending up in the dykes of high nature conservation for there excellent water quality is also high from increased surface covering, the current internal drainage board system can only just cope with the quantities of water that arrive there from small amounts of rainfall in the catchment which heightens the flood risk of the sensitive sites.

### **S Lineham**

This land is not suitable for development. It provides an open vista towards Oulton Broad, which is important for the local landscape. it is used by gulls, barn owls, deer and foxes and provides a buffer between houses and the nature reserve and Broads National Park.

Beccles Road is already overwhelmed by traffic and is is often queued up to the Crown roundabout in the direction of Oulton Broad, Traffic is also heavy in the other direction and queues during peak times around the Barnby bends. The A146 cannot absorb this extra traffic in either direction, and there is not enough employment in Lowestoft and local area so people will need to travel for work. There is not the capacity in local health services or schools either.

The increased number of people in the immediate vicinity will be highly likely have an adverse impact on nearby Carlton Marshes nature reserve which includes an SSSI. Already there are problems with dogs off leads and fouling, and also antisocial behaviour which is likely to increase with higher volumes of people.

Drainage water could cause pollution in the marshes further down the hill and adversely affect septic tank drainage of properties including the education centre for the wildlife trust,

### **Broads Authority (Natalie Beal)**



Sites 7 /112 /111 – These lie along the Broads boundary albeit separated by the railway line. Potential for impacts on Landscape character (LCA6) and visual amenity. This would extend the urban boundary of Lowestoft towards the Broads area. Certainly there are likely to be additional recreational pressures as a result of housing development in the area. The Suffolk wildlife Trust and the Carlton marshes reserve lie in close proximity. Housing development at this locating could also create additional land use pressures on fields and grazing marsh in close proximity as residents may seek land for other activities such as allotments, horse grazing etc.

**Carlton Colville Town Council (Christine Sayer)**

The Areas 7 and 112 and 111 west of Beccles Road should be kept clear of additional development in order to preserve the wild life of the marshes.

**NorCas**

I do not think that development in this area is a very idea. Like (1) it would despoil an area of landscape with views up/and to the river valley. It would destroy the character and natural habitat of the area. .

**Suffolk Wildlife Trust (James Meyer)**

Sites 7; 11 and 112 are adjacent to parts of the Broadland Special Protection Area (SPA); The Broads Special Area of Conservation (SAC); the Broadland Ramsar site and Sprat's Water & Marshes, Carlton Coleville Site of Special Scientific Interest (SSSI), these sites are of national and international nature conservation value and a large part of them is owned and managed by Suffolk Wildlife Trust as part of our Carlton and Oulton Marshes reserve. Development in this location appears likely to risk an adverse impact on these sites. The sites may also have ecological value in their own right. For these reasons we would object to their allocation for development.

**113 - Land to the north west of 1-4 Wangford Road, Uggeshall**

**John Lavery**

This comment also applies to plot 15 adjacent to 113. To put a new housing development here would be nothing short of criminal. Apart from being almost entirely agricultural land this is a tranquil rural area with some very low density housing. A development of this type would completely alter the character of Uggeshall, which doesn't have or want the infrastructure required to support this sort of scheme. It could only become a dormitory area completely at odds with its surroundings. There simply must be better places to put housing than this.

**Historic England (Debbie Mack)**

Proximity to Church of St Mary, grade I as well as several grade II listed buildings including Church Farmhouse, Uggeshall House, Churchyard walling, Whitehouse Farm and barn. Potential impact upon setting of high grade listed building and other listed buildings.



## 114 - Land to the south of Church Lane, Corton

### Corton parish council (Gill Armstrong)

This land is within the hundred year erosion area, as stated in the SMP, which at present is still designated as managed retreat

Access onto the Coast Road would be difficult as it is a busy, narrow country lane. Utilities are stretched in Corton, water pressure is already low

### Historic England (Debbie Mack)

Church of St Bartholomew grade II \* to north. Potential impact on high grade Listed Building.

### M J Edwards & Partners (Chris Edwards)

I write in relation to Waveney District Council's consultation on the new Waveney Local Plan exercise and on behalf of our client Christopher Edwards of M J Edwards & Partners. I am pleased to put forward the following site: land of Church Lane, Corton, Suffolk to be considered as a residential allocation in Waveney District Council's new Local Plan. Having discussed the matter with the planning policy team, I have been advised that submissions up to 30th June, 2016 will be accepted and considered.

Our client welcomes the opportunity to comment on the Waveney Local Plan, which will be a single document containing all the planning policies and proposed development sites in the District.

#### The Site

Our client's site is located to the north of Corton, which is classified in the Waveney Core Strategy (The Approach to Future Development in Waveney to 2021) as a 'large village'. The Core Strategy states that 'a small amount of new housing, employment and services and facilities development will be focused on a number of designated larger villages. Up to 5% of the housing growth will be focused in these villages. Where a local housing need is demonstrated, the priority will be for affordable housing. Most development will take place on brownfield sites within the villages but some development may be needed on greenfield sites on the edge.'

Although in March 2015, Waveney district stated that it was able to demonstrate that it had a 5.9 years supply of housing land from 1st April 2016 to 31st March 2021, the statement recognises that the district has experienced under-delivery in terms of the targets set out in the Core Strategy. This is because in the current year 2015/2016 it is anticipated that 162 dwellings will be completed as opposed to the annual target of 290. Therefore the site at Church Lane could contribute to meeting Waveney's housing needs.

The village of Corton has a good range of shops, services and facilities including a shop, primary school and a number of pubs and restaurants. Corton also has good public transport links and acts effectively as a suburb of Lowestoft, which itself has a population of over 70,000. A regular bus service (1 and 1A) connects the village to the larger town of Lowestoft in just under 15 minutes; it also provides direct links to Gorleston and Great Yarmouth. Lowestoft has a much larger range of facilities including a range of high street stores, several doctors' surgeries, several primary schools, a high school and a railway station, with regular services to Norwich and Ipswich.

The site itself is located to the north of the village, on Church Lane. The site adjoins the settlement boundary and therefore development on the site would represent a logical extension of Corton. Suitable access could be achieved off Church Lane, however the speed limit is currently national speed limit and therefore it is proposed that the 30mph (48km/h) zone be extended northwards to increase the safety of the access. The site



is in Flood Zone 1 and is therefore at low risk of flooding.

The site is well-related to the settlement of Corton and has existing residential development running along its southern boundary. The site is well contained to the east by Church Lane, which provides a clear boundary to the site, beyond which there are some houses and a caravan park. There are also allotments beyond the site boundary on the western side of Church Lane, and it is proposed that these could be extended westwards slightly if additional plots are required to sever the proposed new community.

The western boundary is screened by a tree belt, which follows the route of the dismantled Yarmouth to Lowestoft railway line. This tree belt helps to contain the site and provides a natural boundary on its western side. It is proposed that the northern boundary of the site would be created by providing a screening buffer of trees and hedgerows, which would help to screen the site from the north, while providing biodiversity benefits for wildlife – this would be carefully integrated with the existing pond and enhancements made.

The site is capable of accommodating circa 120 dwellings (density of 30 dwellings per hectare) and new public open space and/or an extension to the adjacent allotments with approximately 40 affordable dwellings (35% dependent on viability assessment). The exact dwelling type and tenure mix would be agreed with the Waveney District Council's housing department.

In light of the above it is clear that the site is a sustainable location with good access to shops, services and facilities. The site is available and could contribute to meeting the district's housing targets within the next 5 years. Therefore it is recommended that the site should be allocated for residential development in the new Waveney Local Plan to help meet Waveney's housing requirements over the course of the plan period.

#### **M J Edwards & Partners (Chris Edwards)**

**Approve** of this site, it fits well into the building envelop of the existing village and does not protrude extensively into the strategic gap as of the other options available around Corton. There is also an existing road system in place to service any future development. It would also address the issue of "roll back" for existing properties East of the "red line" and coastal erosion. Close proximity to existing schools, shops and bus routes and aesthetically keeps the heart of the village community close unlike Hopton and Blundeston.

### **115 - Land to the west of Halesworth (Block 1), Halesworth**

#### **Beverley Arthrell**

I MOST STRONGLY OBJECT TO THIS PROPOSAL

THIS IS FARMLAND, NOT A BUILDING PLOT.

NOISE AND TRAFFIC GENERATED WITH CONSTRUCTION IS NOT ACCEPTABLE

SCHOOLS AND HEALTH SERVICES IN HALESWORTH ARE ALREADY OVERLOADED.

HALESWORTH MUST NOT BE TURNED INTO A SPRAWLING METROPOLIS.

#### **Alan Baguste**



The scale of a development is overwhelming. It would contradict the Landscape Character Assessment

The local services cannot support such numbers. Schools, Health, road infrastructure and Emergency services. Halesworth is already isolated from health services. If development in any number is required then it should be distributed across the town and within its existing housing boundaries.

#### **Alan Baguste**

Site 115. The scale of a development is overwhelming. It would contradict the Landscape Character Assessment. And is also outside the "physical limits" rule.

The local services cannot support such numbers. Schools, Health, road infrastructure and Emergency services. Halesworth is already isolated from health services. If development in any number is required then it should be distributed across the town and within its existing housing boundaries.

#### **Joanna Barfield**

Very concerned about this. It's alongside a biodiversity site / area of beauty. Prone to flooding down in the valley. Makes Halesworth sprawl outwards into the countryside. Better to keep housing within the town pocket / up on higher ground near industrial site on way to Norwich near major road.

#### **Andrew Barnes**

We cannot possibly imagine the impact of up to 1000 houses being built on Sites 115 and 116. It would completely change the character of this end of Halesworth, from a very pleasant country town into a nightmare scenario of hundreds more cars and people. Parking cars in town is difficult enough now (bring back the 1 hour free parking in the centre car park!). It would be impossible with all those extra cars.

We have lived here for many years and hope to continue to do so for a long time yet. It is a lovely place to live, with friendly neighbours, many of whom have also lived here for many years. Many of us have this lovely view across the fields, this being what attracted us to our bungalow initially and we would certainly not wish to lose this asset! I cannot imagine looking out on to bricks and mortar in place of the lovely green fields and trees. You also raise the point that local facilities will be overwhelmed, which would mean that further building drainage etc enlargement of doctors facilities etc would all have to take place.

I am certainly against this idea of this proposal.

#### **Chapman**

This site together with site 116 is for a total of over 900 houses. That is probably over 3000 extra on the population of our small market town, how can this increase be allowed ? The NHS services in the town are already struggling to cope, the Surgery can not take any more patients without further extension and somehow extra doctors will also be needed. The local school system has already been broken up with the closure of the Middle School which has necessitated the two primary schools to be expanded to full capacity, there is no room for any more children. The concreting over of these two fields will force all rainwater straight down to the river which already floods with heavy rainfall so the lower end of that plot will be prone to flooding on a regular basis. These two sites together with the others earmarked will change our town forever, it should not happen



### **Chapman**

Further to my previous comments I wish to add that the large amount of extra houses on this site and 116 will have a detrimental impact on the many species of wildlife which inhabit the area. These include owls, bats, hedgehogs, hares, muntjacs, partridges, dormice plus many others.

### **Paul Cope**

Would increase the spread of Halesworth towards Walpole and build on green landscape.

### **Amy Daniels**

I thoroughly disagree with the proposed housing on the field behind Dukes Drive. Nearly 1000 homes with an average of 2 people a home will put an enormous strain on our Doctors, schools, transport and employment. We only have one primary school which is full with very little room for expansion. The traffic during school time is already very busy. This will increase transportation within the town to various village schools. The Doctors surgery is already over worked and obtaining an appointment can be up to a two or three weeks wait.

A Lot of our facilities in Halesworth have been closed and are about to closed due to lack of funds.

Walpole road would not cope with the increase in traffic if each house had a vehicle.

The wildlife would seriously be affected as this is an area of natural habitat.

What facilities would the developer provide for the town should the proposed development go ahead? What sort of housing is to be built? Will there be affordable housing for the young people to buy. Will there be social housing?

Our small Market Town does not have the Retail Facilities for another 2000 + people

I believe the fields behind Dukes Drive are Green Belt! I feel if we lose them we lose are beautiful countryside.

This is for plot 115 and 116

### **Peter Cockerton and Karen Evans**

We do not think that land west of Halesworth on either side of Walpole Road is suitable for a large development. # 115, 116

### **Brian Frost**

1. Problem with schools - The local middle school has been closed fairly recently which leaves only a first school in the area (the older pupils are bussed to Bungay). So with a large increase of houses, a brand new school system would have to be implemented to cope with the numbers of "new" children to the area. Why close a middle school if a development was envisaged and where would that be built? The present first school could not cope.

2. Lay of the land - The area under consideration does have quite a "hollow" in the middle so it collects a lot of water. If you look on the fields between Halesworth and Walpole in the wet weather you would see that a lot of the fields do become waterlogged. With a large development close by there doesn't seem to be any room for the excess water to be accommodated and the problem of flooding would be a big concern.

3. Infrastructure - The medical centre would not be large enough to cater for the large number of people who might need medical advice. So that would have to be dealt with too - though I think there are plans afoot to do



some enlarging of the present medical centre.

If there is need to put housing in this area, other sites come to mind but observations on 2 and 3 would still apply. Examples would be the area between Saxon Way and the industrial estate on the Bramfield Road, the presently disused site where the middle school was recently demolished and close to the middle of the town.

**Mr & Mrs B Hammond**

Do we need? And can we accommodate 980 more houses in Halesworth. The sewage treatment plant must be near capacity. We have a small primary school, the doctors surgery is already overworked.

There are no work opportunities.

Presumably the extra surface water would be channelled to the flood plain endangering existing properties.

This proposal would devalue properties by ruining an attractive area and a greenfield site.

Not suitable or acceptable.

If expansion is necessary it would be better to the north of the town.

**Bill Holden**

Sirs, I MOST STRONGLY OBJECT to the proposal of development of this farmland.

The town of Halesworth is a small market town is not appropriate for this size of development

The infrastructure such as schools and medical facilities are already overloaded.

The extra traffic and noise produced which would be generated for myself and neighbours is not acceptable.

Regards, William Holden

**Bill Jackson**

We, as local residents object to the proposed allocation of this sites 115/116 ("the Sites") within the emerging Waverley Local Plan ("the Local Plan").

The proposed allocation is for 420 houses and 560 houses on the sites. This would be a far greater density of residential premises than exists in the areas of Halesworth adjoining the site. This would lead to a disproportionate spread of people throughout the town, with greater densities of residential premises further away from the centre of the town, rather than in the centre. Before considering the expansion of the town's boundaries adequate consideration needs to be given to increasing the density of sites in Halesworth currently underused for residential accommodation.



The proposed allocation of these sites would allow for the expansion of the town far beyond its traditional boundaries and would encroach on greenfield, agricultural land. There is a need for agricultural land and the agricultural sector is currently under a great deal of strain. It would be inappropriate to allocate these sites for residential accommodation without first exhausting the options for infill and/or brownfield development within the town.

There are sites currently listed for consideration in the town which should be considered in advance of this site, as they are preferable sites for satisfying the council's housing need, once objectively assessed (i.e. 161, 155, 65, etc.). These sites are within the boundaries of the town, are not in areas of countryside or agriculture, are (in many instances) brownfield land which has been previously developed. These sites should be considered in preference to 115/116 as they would not expand the boundaries of the town, would not encroach upon the countryside, would not deprive the vicinity of agricultural land, and would not constitute development on previously undeveloped, greenfield land.

Furthermore and in general, Halesworth does not have the public services to support an increase in population size. The local middle school and hospital were both recently cut and the town is currently underserved. The allocation of these sites, for this number of houses, would be inappropriate as the town does not have the infrastructure to support them.

#### **Tony L**

Surely this is part of the green belt but if extra land eventually needed it would be a better option than 116 where flooding would be a concern

#### **Brenda Ling**

We are absolutely against any such development on these sites. We have been to the public exhibition in town today a 2% growth is more than enough!

- ▶ Existing facilities cannot take any more people or cars.
- ▶ Primary school fit to bursting, more traffic to ferry children to High Schools
- ▶ Surgery cannot get appointments now, no Drs wanting to become GPs. No matter if a new facility was built, and where?
- ▶ Arable (farm land) needs to be preserved as we rely on imports to much now and as the world is today, we could soon be cut off from supplies and need to grow more food. Look into future and see if we keep building then our island will be just concrete.
- ▶ More houses just encourages more immigrants to come and abuse our system.
- ▶ Look at laws concerning second homes and buy to let, this could free up so many houses in Suffolk, that stand empty most of the year!
- ▶ There are no jobs, no shops, no facilities.
- ▶ Keep Halesworth a small market town not a sprawling unrecognisable hamlet.
- ▶ Water and drainage systems, overflow now in wet weather conditions.
- ▶ More retired people, more strain on medical asylums. Furthest away from any major hospital, our hospital to close down.

#### **John Ling**

I believe this site to be most unsuitable because:



1. This end of Waveney area would only be sold to older people leaving London who would not work here putting more strain on local services.
2. Roads here are not suitable for extra traffic.
3. There is already 3 week waiting lists for doctors.
4. It is prime agricultural land.
5. Sewers at capacity already.
6. Huge water main runs through both plots.
7. Schools already overflowing.

#### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

#### **Edward Barnaby Milburn**

This land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ It is outside the present town limit.
- ▶ There are opportunities to provide the residential allocation for the Plan period significantly closer to the town centre than this land.
- ▶ The land is remote from the town centre and residential development of the scale suggested would overwhelm the road network and the infrastructure of the town.
- ▶ The crest of this large field is a prominent feature on the approach to Halesworth from the west and residential development here would conspicuously harm the landscape setting of the town.

#### **J Munson**

#### **Housing development on this site (115) would be inappropriate and unsustainable for the following reasons;**

This site (115) indicates 420 new homes which equates to an additional 966 people (based on the national average of 2.3 people per household) which would be totally unsuitable for a town that has limited services (particularly social, leisure and education) and the main retail and employment activity and health services are over a mile away and not within easy walking distance. This population increase is significantly higher than any of the Options listed for the Waveney Local Plan.

If site 115 was allocated for housing, it would be highly likely that the neighbouring site 116 would also be approved for housing allocation. Therefore the two sites 115 and 116 collectively would add an estimated 2254 additional people to the town representing a percentage increase of nearly 48%. This would be highly unsustainable and is not in line with the indicated Options for the Waveney Local Plan which suggests housing growth in Halesworth of 5% for Options 1,2 and 4 and 8% for Option 3.

#### **The pressure on infrastructure and services would be completely unsustainable as Halesworth currently faces the following issues;**

- ▶ No further education provision i.e. nearest high school is 9 miles away in Bungay



- ▶ A vocational training centre with an uncertain future (North Suffolk Skills Academy due to close)
- ▶ No dedicated sports centre
- ▶ No swimming pool (nearest at Bungay 9 miles away)
- ▶ Limited community hall facility (Rifle Hall is the only community hall in the town but limited on space, capacity and services)
- ▶ Only one small supermarket
- ▶ Limited range of services within the town compared to larger market towns and urban centres
- ▶ Limited health provision with major hospitals some distance away at Gorleston and Norwich
- ▶ Limited growth in local employment opportunities

**Site 115 in particular is also affected by the following issues;**

- ▶ Not within easy walking distance of key services and facilities;
  - 1.5+ miles from any primary school
  - 1.5+ miles from health services e.g. doctors surgery
  - 1.5+ miles from the proposed Halesworth Campus site (future services)
  - Over 1 mile from the retail centre of the town
  - 2.0 miles to the main industrial estates on Norwich Road (The Blyth Road Industrial estate offers a lower number of employment options)
  - Almost 1.5 miles to the Halesworth train station and main bus stops
- ▶ Currently on open farmland (which is being farmed) and therefore should be retained for agricultural use to help meet future demands for cereal and other crops (for food and energy demands as population continues to increase)
- ▶ Has no existing infrastructure and services in place e.g. water, sewerage, electricity, telecoms/broadband as well as no road infrastructure.
- ▶ Likely to generate significant traffic movements due to the distance from services and employment and thus residents much less likely to walk and instead use personal transport. This is in conflict with current policies which encourage less reliance on using private vehicles and more sustainable, healthy communities based on walking and exercise.
- ▶ Halesworth has an aging population (with average age significantly higher than the national average) and therefore greater impact on aged care and health services. This needs to be taken into consideration.
- ▶ Services (health, social, leisure), employment options and transport hubs in Halesworth are largely all in the northern part of the town (north of Quay St/Holton Rd), therefore it would be sensible to ensure that any future housing sites allocated are within close proximity or within walking distance (within 1 mile). More sensible and sustainable options could be proposed sites 65, 151 and 152 as examples.

**Nic Pike**

Objection to this proposed development on the following grounds:

- ▶ Unacceptable high density and over development of site
- ▶ Detrimental affect on residential amenity of neighbouring properties
- ▶ visual impact of area
- ▶ negative visual impact on Halesworth and Walpole
- ▶ Development is out of scale to Halesworth town (combined with proposal 116 this will increase the town population by approximately 40% assuming average 4 person occupancy)
- ▶ Loss of existing views from properties and loss of vista from Walpole towards Halesworth
- ▶ Halesworth infra-structure will be unable to cope with this over development - lack of schools, doctors, dentists, transport links, employment prospects.

**Janet Rice**



With reference to the proposed housing development behind Dukes Drive(site 115) and also Bedingfield Crescent (site 116) I wish to make the following points:

980 new houses will need to comply with the government's intention to create affordable homes for first time buyers and consequently a sizeable proportion will be young families. This will have a considerable effect on the demographics of this small town and implications to its infrastructure. If we assume that 60% - or 600 houses, have two children, education, health and social needs must be met. Pre-school and primary education cannot accommodate the proportion of these that are most likely to be under 10 years of age and expansion of the facilities is not possible given that the school borders the main road and a housing estate. The middle school could have accommodated an increase but alas, has just been demolished and resources disposed of. The skills centre is totally unsuitable as the rooms are too small, or designed as workshops.

There will of course be children 11-18 category and the two local high schools are currently close to capacity; Sir John Leman is full. Places are available in schools in the Lowestoft area but it seems foolish to deliberately build houses in an area that necessitates transporting that number of children to schools elsewhere.

This age group has additional issues that will require addressing; bored teenagers result in anti-social behaviour. One outdoor swimming pool and skate park will not suffice; facilities must be created to help deal with this problem before it arises.

Healthcare is also a major concern. The current health centre is already stretched to deal with the requirements of the town, appointments frequently are extremely difficult to obtain. With nearly 1000 houses, 2000 adults (many potentially pregnant) and approximately 1500 children , services will not cope.

Dukes Drive already has a tendency to flood as the drainage system cannot cope with the existing houses, this will only get worse with an additional 1000 homes and the subsequent loss of absorbent ground. The impact of building on site 116 will mean the flooding that does now occur in this farm land will be transferred downstream to the town.

Finally, the shops, roads and basic facilities will need improving if the town is to survive even a small increase in houses. Employment opportunities for this demographic is also sadly lacking in this area.

Although this sounds as 'not in my back yard', it genuinely isn't. The demographics of this area may improve with some new homes but the number proposed cannot be absorbed by the community. Other sites that can provide proximity to schools, & health facilities are available elsewhere that would benefit from a rebalance with the population and would be a more suitable option as they might regenerate less well managed areas and improve them. I hope the Council consider these points before making a decision.

#### **Louise & Heath Sewell & Caplin**

My following comments relate directly to site no's 115 & 116. I totally oppose this development for the following reasons: This large volume of proposed houses would be beyond the capabilities of the existing infrastructure. This quantity of housing would mean at least approximately 1,000 people moving into the area. Existing services are already over stretched these include education, health, transport, traffic, social care, shops, employment and social facilities. We have no large supermarkets in the area and this doesn't look like changing anytime soon. Surgery and dental care are already stretched to the limits, to the point we already have to pay for private dental care. We have one school left in the area now Halesworth Middle has closed. Education establishments are already running to full capacity and it is difficult to understand how such a vast uplift in population will be integrated into the existing education system. Parking for only school left is already chaotic and creates problems for other road users. We lack a community centre, sports centre and other leisure facilities. Employment is limited, certainly for professional people. Many people are already travelling out of Halesworth for employment. The existing road structure is nowhere near adequate for what would be a massive increase in traffic. Drainage is also a problem and we understand there is a potential of flooding on this land. Accidents have occurred on Walpole Road, one of which was a fatality. Halesworth is a small market



town only with Halesworth only just holding on to its identity such a development on these sites could potentially kill the town and serve only to benefit the land owners and developers. For the above reasons together with the potential negative effect on surrounding properties and wildlife I totally oppose the proposed development of site no's 115 & 116.

### **Diane Thomas**

I understand that a further application for the development of site 115 has again been submitted via the landowner and possible property developer. The exception it seems is for 420 instead of 430 properties. However I note that site 116 is for a further 560 houses making a grand total of 980!

In September 2007 I submitted my comments to the WDC and Halesworth Town Council on the then Site 168 and to this effect enclose a copy of my notes together with those now referred to as Sites 115 and 116.

My original comments remain but since then there have been additional pressures on the town.

#### Health and social care

The present population is already putting extreme pressures on doctors and clinical facilities not least of which is the planned closure of Patrick Stead Hospital. To increase the population by probably at least 1,500 people raises critical questioning of this application. Day and residential care are limited and out of town placements make contact and support difficult and oft times inappropriate.

#### Education

Since the last application Halesworth Middle School has closed requiring the transport of children to Beccles and Bungay. How would this affect the education of young people from the new estates for surely the dwellings should not be for all retired people?

#### Car parking

The Angel car park is presently under review as a hub for public transport thus reducing parking facilities. Where would the increase of daily shoppers park as walking distances would be in excess?

#### Transport

Public transport varies. The hourly rail service between Lowestoft and Ipswich is good but bus services vary. A volunteer service is a wonderful help but could not be stretched to include the proposed developments.

#### Employment

Continues to be limited and would again demand an increase in road traffic and parking for commuters.

#### Retail facilities

These continue to be limited and would again demand more car users and car parking facilities. The proposed sites are too far removed for people to generally walk/shop.

#### Facilities for waste

Still very limited. No proposal for local facilities thus an increase in possible 'fly tipping'.

#### Site development

The present local road systems are totally unsuitable for such developments and not least would be a real concern for drainage.

Halesworth is a small rural market town. Thanks to the efforts of volunteers some facilities have improved not least for youngsters in the town part and the Millennium Green. However Sites 115 and 116 are quite inappropriate and would serve to benefit the landowner and possible developer. Sites 115 and 116 are not conducive to 'affordable housing' and perhaps an alternative consideration could be given to owners of second/holiday homes so that they could become more available to young families.



Thus for all the above reasons and the effect on surrounding wildlife and the community I totally oppose the applications for the proposed development of Sites 115 and 116 and view these applications as totally unsuitable for such a small market town.

ENCLOSURE

RE: PLANNING POLICY, WA VENEY DISTRICT COUNCIL - SITE NO.168

I previously attended a local meeting and exhibition which included plans for the future of Halesworth and I now find further proposals under consideration for the area, amongst which is Site No. 168. This is a site which appears to be in direct conflict with the nature, needs and development of the area therefore I totally oppose this development for the following reasons:

To construct a development of 430 houses would be over and beyond what the infrastructure could cope with or need. 430 houses would mean at least approximately 1,000 people of all ages thus affecting the utility services, health, education, traffic, transport, social care, shops, businesses, employment and social facilities e.g. community centre/library.

430 houses based on today's average= 800+ cars (2 per family). 1,000 people would have need for medical care - present surgery is already over stretched and the hospital facilities are constantly under threat. Dental care is limited with many people already having to go beyond Halesworth for treatment.

Care of the elderly/infirm already under pressure. Limited affordable sheltered housing/care homes/day care available. Help/support via Social Services restricted due to limited finance and/or availability of trained staff.

Education establishments are running to near capacity and pre school facilities are limited. Parking by schools, both pre and after school hours, is creating problems now for other road users.

Car parking already a nightmare so where would the additional car parks be bearing in mind the inclusion of other proposed developments?

Retail facilities are adequate at present, although limited. Where would other retail outlets be placed. Don't forget, not everybody has transport to go out of town!

We still lack a community centre or centre for the young people, for this respect Halesworth appears to be the Cinderella of Waveney District Council and Suffolk County Council. There has already been much debate and arguments, and ultimately no decision reached on this matter which does not bode well for the future of the town.

Employment is limited with professional people in particular and many others already having to travel out of Halesworth which would, in turn with this development, increase vehicles on the road resulting in extra wear and tear on the roads. Where would people work because surely WDC would not wish to see an increase in the retired population?

Thanks to the effect over recent years by groups and individuals in the area an improvement has been made to the present transport system but demands are already increasing. WDC has been slow to acknowledge the problem especially the elected members who generally seem to have little use or understanding of the need for transport.

We are being encouraged to be 'green' but for the present community the nearest waste sites are in Beccles and Southwold. This is quite unrealistic and the constant requests for a 'tip' have been unsuccessful. I would suggest that with a site such as no.168 and other in the region, the problems would increase and just encourage fly tipping.

Although accepting a need for more domestic properties and the Government policy for such developments, Halesworth is a small market town only just holding onto to its identity. It does not portraint the potential for becoming a large and impersonal area. Such a development as Site No.168 would totally destroy the town and



would serve to benefit the landowners and developers only. It would appear that they have no real concern for the social aspects on the infrastructure of the area but rather see this as an opportunity for monetary gain!

Equally, perhaps the Government/Local Councils might care to give consideration to the way local properties have been bought as second/holiday homes for financial gain as seen regularly in this area. This situation has helped increase the price of property thus depriving young and local people the opportunity to remain in the area.

Thus for all the above reasons together with the effect on surrounding property and wildlife, I totally oppose the application for the proposed development of Site No.168.

### **Lynnie**

Having lived adjacent to this site for 12 years, I have noticed the increase in incidents of flooding of the River Blyth. Building on this area and also site 116 will have an increased impact on this ever increasing problem.

is this site really intended for affordable housing? If so its not ideally located for any amenities within easy walking distance for families who are the prime candidates for such housing. This would mean more unnecessary traffic. If it is not intended for affordable housing, then do we really need more second home owners in the town as they bring little or no benefit to the community or economy. Whoever the occupants are,mt hey will put further pressure on the already stretched medical amenities in the town.

i am also concerned about the consequences to the vast array of wildlife I have seen on this land since living here...barn owls, marsh harriers, deer, hedgehogs, foxes, hares plus all the songbirds. This over development will have a huge impact on our natural environment and soon we will have no countryside left!

i was born in rural Suffolk...we want it kept rural, not a concrete jungle!!

### **David Winter**

The "Initial sustainability Appraisal of Emerging Options" paper is encouraging in that the only negative points identified relate to;

- (A) "conserving and enhancing the quality and distinctiveness of landscapes and townscapes"
- (B) "reducing contributions to climate change and mitigate effects"
- (C) "conserving natural resources"

In response to item (A), whilst this is certainly a matter for consideration, we believe this potential issue can be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. With regard to items (B) and (C), considering Site 115 is Greenfield land, it is often the case that potential issues can be identified in relation to these matters, however given the potential scale of the development at the site, and it's proximity to Site 116 (which we have also been submitted on behalf of our client) we believe that a potential development could be designed to involve particular features and infrastructure improvements to mitigate and counteract these potential issues.

The site extends to approximately 14.40 hectares and could accommodate up to approximately 432 dwellings (based on an assumed 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

Development of the site would represent a logical extension to the town along Walpole Road. It is abutted by residential development to the east, and the southern boundary is formed of a public highway. As mentioned previously within this representation, the land to the south is also owned by our client, and further details regarding that site are set out overleaf.



When considering potential employment growth opportunities within Waveney and it's surrounding districts, it is important to realise that Halesworth is situated only approximately 14.8 miles to the north west of Sizewell, an area where there is likely to be considerable employment growth over the coming decade. Consequently, we believe that the site's vicinity to this employment growth area helps to improve it's sustainability.

Whilst we appreciate that it may not be preferable for the entirety of the site to be developed, we will continue to focus on the site as a whole as we believe it possesses the capabilities required to potentially facilitate considerable residential development, in that it benefits from excellent access and is serviceable.

Subsequent to the above narrative, we consider the site to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation to this site.

**DC Patrick Newsagents (DC Patrick)**

Yes please when is Halesworth going to restart growing.

**Halesworth Town Council (N Rees)**

Sites 115 and 116 are beyond the 'natural' end of the town at Dukes Drive. The Walpole Road cannot support a development of 980 extra houses. The infrastructure as in schools, doctors and access to medical care is completely inadequate for any such development. This would be very unpopular with HTC and the residents of Halesworth.

**Historic England (Debbie Mack)**

Cookley White House, grade II to south and the Grange grade II to south east. Potential impact on setting of listed buildings.

**none (Bernard Everett)**

In 2010 it was deemed this site was unsuitable. Six years on nothing has changed so it is still unsuitable.

This would spoil the rural view and wildlife like birds, foxes, hedgehogs and insect life would suffer.

Also take thousands of pounds off the properties over looking this view there are brown sites available for development.

This amount of house on site 115 and 116 nearly 1,000 that's 2,000 people plus.

Our doctors, schools, sewage water drainage could not cope.

Pollution would increase, due to increase of traffic.

You need to consider this any time you want to see the view behind my house you would be welcome.



**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 115 & 116 are outside the village envelope, which should end at Dukes Drive. The existing infrastructure could not support the 980 proposed housing to the north of the town.

**116 - Land to the west of Halesworth (Block 2), Halesworth**

**Beverley Arthrell**

I MOST STRONGLY OBJECT TO THIS PROPOSAL

THIS AREA IS DESIGNATED AS FARMLAND, NOT A BUILDING PLOT

EXTRA TRAFFIC AND NOISE GENERATED BY CONSTRUCTION AND THE USE OF WALPOLE ROAD BY THESE RESIDENCES AFTER CONSTRUCTION IS NOT ACCEPTABLE.

SCHOOLS AND HEALTH SERVICES IN HALESWORTH ARE ALREADY OVERLOADED

THE TOWN OF HALESWORTH IS UNIQUE AND MUST NOT BE TURNED INTO ANOTHER SPRAWLING METROPOLIS

**Alan Baguste**

Site 116:

The scale of a development is overwhelming. It would contradict the Landscape Character Assessment. And is also outside the "physical limits" rule.

The local services cannot support such numbers. Schools, Health, road infrastructure and Emergency services. Halesworth is already isolated from health services. If development in any number is required then it should be distributed across the town and within its existing housing boundaries.

**Joanna Barfield**

Very concerned about this. It's alongside a biodiversity site / area of beauty. Prone to flooding down in the valley. Makes Halesworth sprawl outwards into the countryside. Better to keep housing within the town pocket / up on higher ground near industrial site on way to Norwich near major road.

**Andrew Barnes**

We cannot possibly imagine the impact of up to 1000 houses being built on Sites 115 and 116. It would completely change the character of this end of Halesworth, from a very pleasant country town into a nightmare scenario of hundreds more cars and people. Parking cars in town is difficult enough now (bring back the 1 hour free parking in the centre car park!). It would be impossible with all those extra cars.



We have lived here for many years and hope to continue to do so for a long time yet. It is a lovely place to live, with friendly neighbours, many of whom have also lived here for many years. Many of us have this lovely view across the fields, this being what attracted us to our bungalow initially and we would certainly not wish to lose this asset! I cannot imagine looking out on to bricks and mortar in place of the lovely green fields and trees. You also raise the point that local facilities will be overwhelmed, which would mean that further building drainage etc enlargement of doctors facilities etc would all have to take place.

I am certainly against this idea of this proposal.

**Paul Cope**

Would increase the spread of Halesworth towards Walpole and build on green landscape.

**Amy Daniels**

I thoroughly disagree with the proposed housing on the field behind Dukes Drive. Nearly 1000 homes with an average of 2 people a home will put an enormous strain on our Doctors, schools, transport and employment. We only have one primary school which is full with very little room for expansion. The traffic during school time is already very busy. This will increase transportation within the town to various village schools. The Doctors surgery is already over worked and obtaining an appointment can be up to a two or three weeks wait.

A Lot of our facilities in Halesworth have been closed and are about to closed due to lack of funds.

Walpole road would not cope with the increase in traffic if each house had a vehicle.

The wildlife would seriously be affected as this is an area of natural habitat.

What facilities would the developer provide for the town should the proposed development go ahead? What sort of housing is to be built? Will there be affordable housing for the young people to buy. Will there be social housing?

Our small Market Town does not have the Retail Facilities for another 2000 + people

I believe the fields behind Dukes Drive are Green Belt! I feel if we lose them we lose are beautiful countryside.

This is for plot 115 and 116

**Peter Cockerton and Karen Evans**

We do not think that land west of Halesworth on either side of Walpole Road is suitable for a large development. # 115, 116

**Brian Frost**

1. Problem with schools - The local middle school has been closed fairly recently which leaves only a first school in the area (the older pupils are bussed to Bungay). So with a large increase of houses, a brand new school system would have to be implemented to cope with the numbers of "new" children to the area. Why close a middle school if a development was envisaged and where would that be built? The present first school could not cope.

2. Lay of the land - The area under consideration does have quite a "hollow" in the middle so it collects a lot of water. If you look on the fields between Halesworth and Walpole in the wet weather you would see that a lot of the fields do become waterlogged. With a large development close by there doesn't seem to be any room for the excess water to be accommodated and the problem of flooding would be a big concern.



3. Infrastructure - The medical centre would not be large enough to cater for the large number of people who might need medical advice. So that would have to be dealt with too - though I think there are plans afoot to do some enlarging of the present medical centre.

If there is need to put housing in this area, other sites come to mind but observations on 2 and 3 would still apply. Examples would be the area between Saxon Way and the industrial estate on the Bramfield Road, the presently disused site where the middle school was recently demolished and close to the middle of the town.

**Mr & Mrs B Hammond**

Do we need? And can we accommodate 980 more houses in Halesworth. The sewage treatment plant must be near capacity. We have a small primary school, the doctors surgery is already overworked.

There are no work opportunities.

Presumably the extra surface water would be channelled to the flood plain endangering existing properties.

This proposal would devalue properties by ruining an attractive area and a greenfield site.

Not suitable or acceptable.

If expansion is necessary it would be better to the north of the town.

**dave47**

**SITE 116 (BEHIND BEDINGFIELD CRESCENT AND KENNEDY AVENUE) and SITE 115 (BEHIND DUKES DRIVE)**

These particular sites are on the edge of town on greenfield sites. These are highly inappropriate sites for new housing as they could be regarded as rural sites on the outer edge of town and on existing, actively farmed, land.

Housing development on these sites would be unsustainable as they are located at least a mile from the major town centre services of Halesworth and up to 2 miles to the primary school. People will be far less likely to walk over distances such as this and are much more likely to drive, creating significantly higher traffic movements and air pollution. This conflicts with environmental policies.

Although Halesworth serves a wide rural area, future significant housing growth would not be sustainable with the current level of service provision. For example, major hospitals at Gorleston or Norwich are both 45 mins away. The current doctors surgery is also not within walking distance of these proposed sites 115 and 116, and the future of the local Patrick Stead hospital is uncertain.

Education provision is also limited with no high school or middle school, children will therefore have to be bussed to neighbouring towns resulting in much higher traffic movements and a less environmentally sustainable education model.

Future housing development in Halesworth should be concentrated on existing brownfield sites within walking distance of town centre services, education and healthcare facilities.

**Bill Holden**

Sirs,



I MOST STRONGLY OBJECT TO THE PROPOSED DEVELOPMENT OF THIS FARMLAND.

The additional traffic and noise generated by this development is not acceptable to myself or neighbours.

The infrastructure of schools and health services are already overloaded.

The town of Halesworth is unique and must not be turned into another sprawling metropolis.

**Bill Jackson**

We, as local residents object to the proposed allocation of this sites 115/116 ("the Sites") within the emerging Waverley Local Plan ("the Local Plan").

The proposed allocation is for 420 houses and 560 houses on the sites. This would be a far greater density of residential premises than exists in the areas of Halesworth adjoining the site. This would lead to a disproportionate spread of people throughout the town, with greater densities of residential premises further away from the centre of the town, rather than in the centre. Before considering the expansion of the town's boundaries adequate consideration needs to be given to increasing the density of sites in Halesworth currently underused for residential accommodation.

The proposed allocation of these sites would allow for the expansion of the town far beyond its traditional boundaries and would encroach on greenfield, agricultural land. There is a need for agricultural land and the agricultural sector is currently under a great deal of strain. It would be inappropriate to allocate these sites for residential accommodation without first exhausting the options for infill and/or brownfield development within the town.

There are sites currently listed for consideration in the town which should be considered in advance of this site, as they are preferable sites for satisfying the council's housing need, once objectively assessed (i.e. 161, 155, 65, etc.). These sites are within the boundaries of the town, are not in areas of countryside or agriculture, are (in many instances) brownfield land which has been previously developed. These sites should be considered in preference to 115/116 as they would not expand the boundaries of the town, would not encroach upon the countryside, would not deprive the vicinity of agricultural land, and would not constitute development on previously undeveloped, greenfield land.

Furthermore and in general, Halesworth does not have the public services to support an increase in population size. The local middle school and hospital were both recently cut and the town is currently underserved. The allocation of these sites, for this number of houses, would be inappropriate as the town does not have the infrastructure to support them.

**Tony L**

Green belt? Also flooding risk.

**John Lavery**



This Comment refers to Blocks 115 and 116. The gap between Halesworth and Walpole doesn't need any further reduction by encroachment of Halesworth on good agricultural land. Better to infill between Halesworth and the Airfield or Holton rather than any more development on this side of Halesworth

### **Brenda Ling**

We are absolutely against any such development on these sites. We have been to the public exhibition in town today a 2% growth is more than enough!

- ▶ Existing facilities cannot take any more people or cars.
- ▶ Primary school fit to bursting, more traffic to ferry children to High Schools
- ▶ Surgery cannot get appointments now, no Drs wanting to become GPs. No matter if a new facility was built, and where?
- ▶ Arable (farm land) needs to be preserved as we rely on imports to much now and as the world is today, we could soon be cut off from supplies and need to grow more food. Look into future and see if we keep building then our island will be just concrete.
- ▶ More houses just encourages more immigrants to come and abuse our system.
- ▶ Look at laws concerning second homes and buy to let, this could free up so many houses in Suffolk, that stand empty most of the year!
- ▶ There are no jobs, no shops, no facilities.
- ▶ Keep Halesworth a small market town not a sprawling unrecognisable hamlet.
- ▶ Water and drainage systems, overflow now in wet weather conditions.
- ▶ More retired people, more strain on medical asylums. Furthest away from any major hospital, our hospital to close down.

### **John Ling**

I believe this site to be most unsuitable because:

1. This end of Waveney area would only be sold to older people leaving London who would not work here putting more strain on local services.
2. Roads here are not suitable for extra traffic.
3. There is already 3 week waiting lists for doctors.
4. It is prime agricultural land.
5. Sewers at capacity already.
6. Huge water main runs through both plots.
7. Schools already overflowing.

### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

### **Edward Barnaby Milburn**



This land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ It is outside the present town limit.
- ▶ There are opportunities to provide the residential allocation for the Plan period significantly closer to the town centre than this land.
- ▶ The land is remote from the town centre and residential development of the scale suggested would overwhelm the road network and infrastructure of the town.
- ▶ This large field is a significant feature on the approach to Halesworth from the west as it slopes down to the river Blythe - residential development here would conspicuously harm the landscape setting of the town and the Blythe valley.

### **B A Munson**

Housing development on this site would be totally unsuitable for the following reasons;

A development of 560 homes (as indicated) could create an increase in population of over 1200 people which for a town with a population of around 4,700 people would be unsustainable and result in significant pressure on existing services and infrastructure (listed in more detail below). Development at this location would be totally unsuitable for a town that has limited services (particularly social, leisure, health and education) and those existing services e.g. Doctors surgery and primary school, as well as the main retail and employment areas are 1-2 miles away and not within easy walking distance.

key points to consider:

- Health services e.g. Doctors surgery is already under significant pressure. Halesworth has a particularly high proportion of elderly people and with the proposed closure of the Patrick Stead hospital and Southwold hospital already closed there is no local provision and people need to be transported to Gorleston or Norwich. Future care for the elderly should be a particular consideration

- Education - Halesworth has no provision for secondary or further education with the nearest high school 9 miles away. A significant population increase in the town would therefore not be appropriate

- Retail and Services - Halesworth is a small market town with limited retail/service provision and only one small supermarket. The nearest major retail centres are Lowestoft and Norwich and road access is via smaller B roads. There is not enough provision to sustain a large population increase and would put pressure on local roads with people driving to other larger centres

- Employment - Halesworth has a limited provision of employment and so any increase in population would need to be supported by an increase in jobs provision otherwise people will commute out to other areas and therefore unsustainable

- Community facilities - Halesworth does not have a dedicated community hall which meets the needs of the town with the current population let alone any with future increase (the current Rifle Hall is small and unsuitable for many uses).

- Transport - this site is some distance from the main public transport hub at Halesworth train station and people would be unlikely to walk and therefore there could be a significant increase in traffic as a result of people driving

Environmental - this site is located next to an attractive river valley and there is not only threat to existing wildlife and nature including kingfishers and newts but also potential risk of flooding impact in the future. Therefore a large housing development would not be appropriate. There would also be loss of



agricultural land which is currently actively farmed.

If the neighbouring site 115 was also allocated for housing there could be an additional 420 new homes and potentially almost an extra 1000 people. The town would not be able to cope with this massive increase in population as there is not enough employment and provision of services – particularly health and education.

### **J Munson**

#### **Housing development on this site (116) would be inappropriate and unsustainable for the following reasons;**

A development of 560 homes (as indicated) would result in a population increase of 1288 people (based on a national average of 2.3 people per household). Based on the 2011 Census when the Halesworth population was 4,726, development on this site would see an overall increase in the town's population of 27% which would be totally unsuitable for a town that has limited services (particularly social, leisure and education) and the main retail and employment activity and health services are over a mile away and not within easy walking distance. This population increase is significantly higher than any of the Options listed for the Waveney Local Plan.

If site 116 was allocated for housing, it would be highly likely that the neighbouring site 115 would also be approved for housing allocation. This site (115) indicates 420 new homes which equates to an additional 966 people. Therefore the two sites 115 and 116 collectively would add an estimated 2254 additional people to the town representing a percentage increase of nearly 48%. This would be highly unsustainable and is not in line with the indicated Options for the Waveney Local Plan which suggests housing growth in Halesworth of 5% for Options 1,2 and 4 and 8% for Option 3.

#### **The pressure on infrastructure and services would be completely unsustainable as Halesworth currently faces the following issues;**

- ▶ No further education provision i.e. nearest high school is 9 miles away in Bungay
- ▶ A vocational training centre with an uncertain future (North Suffolk Skills Academy due to close)
- ▶ No dedicated sports centre
- ▶ No swimming pool (nearest at Bungay 9 miles away)
- ▶ Limited community hall facility (Rifle Hall is the only community hall in the town but limited on space, capacity and services)
- ▶ Only one small supermarket
- ▶ Limited range of services within the town compared to larger market towns and urban centres
- ▶ Limited health provision with major hospitals some distance away at Gorleston and Norwich
- ▶ Limited growth in local employment opportunities

#### **Site 116 in particular is also affected by the following issues;**

- ▶ Not within easy walking distance of key services and facilities;
  - 1.5+ miles from any primary school
  - 1.5+ miles from health services e.g. doctors surgery
  - 1.5+ miles from the proposed Halesworth Campus site (future services)
  - Over 1 mile from the retail centre of the town
  - 2.0 miles to the main industrial estates on Norwich Road (The Blyth Road Industrial estate offers a lower number of employment options)
  - Almost 1.5 miles to the Halesworth train station and main bus stops
- ▶ Currently on open farmland (which is being farmed) and therefore should be retained for agricultural use to help meet future demands for cereal and other crops (for food and energy demands as population continues to increase)
- ▶ Currently adjacent to an attractive river valley openly viewed from the current main Walpole road. Housing



development on this site would not only be unsightly but may also have a detrimental effect on existing nature and birdlife such as kingfishers - a loss for future generations.

- ▶ There is uncertainty over future potential flood impact due to the close proximity to the river valley. In the longer term there could be a flood risk to some homes.
- ▶ Has no existing infrastructure and services in place e.g. water, sewerage, electricity, telecoms/broadband as well as no road infrastructure.
- ▶ Likely to generate significant traffic movements due to the distance from services and employment and thus residents much less likely to walk and instead use personal transport. This is in conflict with current policies which encourage less reliance on using private vehicles and more sustainable, healthy communities based on walking and exercise.
- ▶ Halesworth has an aging population (with average age significantly higher than the national average) and therefore greater impact on aged care and health services. This needs to be taken into consideration.
- ▶ Services (health, social, leisure), employment options and transport hubs in Halesworth are largely all in the northern part of the town (north of Quay St/Holton Rd), therefore it would be sensible to ensure that any future housing sites allocated are within close proximity or within walking distance (within 1 mile). More sensible and sustainable options could be proposed sites 65, 151 and 152 as examples.

### **Nic Pike**

Objection to this proposed development on the following grounds:

- ▶ Unacceptable high density and over development of site
- ▶ Detrimental affect on residential amenity of neighbouring properties
- ▶ visual impact of area
- ▶ negative visual impact on Halesworth and Walpole
- ▶ Development is out of scale to Halesworth town (combined with proposal 115 this will increase the town population by approximately 40% assuming average 4 person occupancy)
- ▶ Loss of existing views from properties and loss of vista from Walpole towards Halesworth
- ▶ Halesworth infra-structure will be unable to cope with this over development - lack of schools, doctors, dentists, transport links, employment prospects.

### **Janet Rice**

With reference to the proposed housing development behind Dukes Drive(site 115) and also Beddingfield Crescent (site 116) I wish to make the following points:

980 new houses will need to comply with the government's intention to create affordable homes for first time buyers and consequently a sizeable proportion will be young families. This will have a considerable effect on the demographics of this small town and implications to its infrastructure. If we assume that 60% - or 600 houses, have two children, education, health and social needs must be met. Pre-school and primary education cannot accommodate the proportion of these that are most likely to be under 10 years of age and expansion of the facilities is not possible given that the school borders the main road and a housing estate. The middle school could have accommodated an increase but alas, has just been demolished and resources disposed of. The skills centre is totally unsuitable as the rooms are too small, or designed as workshops.

There will of course be children 11-18 category and the two local high schools are currently close to capacity; Sir John Leman is full. Places are available in schools in the Lowestoft area but it seems foolish to deliberately build houses in an area that necessitates transporting that number of children to schools elsewhere.

This age group has additional issues that will require addressing; bored teenagers result in anti-social behaviour. One outdoor swimming pool and skate park will not suffice; facilities must be created to help deal with this problem before it arises.



Healthcare is also a major concern. The current health centre is already stretched to deal with the requirements of the town, appointments frequently are extremely difficult to obtain. With nearly 1000 houses, 2000 adults (many potentially pregnant) and approximately 1500 children, services will not cope.

Dukes Drive already has a tendency to flood as the drainage system cannot cope with the existing houses, this will only get worse with an additional 1000 homes and the subsequent loss of absorbent ground. The impact of building on site 116 will mean the flooding that does now occur in this farm land will be transferred downstream to the town.

Finally, the shops, roads and basic facilities will need improving if the town is to survive even a small increase in houses. Employment opportunities for this demographic is also sadly lacking in this area.

Although this sounds as 'not in my back yard', it genuinely isn't. The demographics of this area may improve with some new homes but the number proposed cannot be absorbed by the community. Other sites that can provide proximity to schools, & health facilities are available elsewhere that would benefit from a rebalance with the population and would be a more suitable option as they might regenerate less well managed areas and improve them. I hope the Council consider these points before making a decision.

#### **Louise & Heath Sewell & Caplin**

My following comments relate directly to site no's 115 & 116. I totally oppose this development for the following reasons: This large volume of proposed houses would be beyond the capabilities of the existing infrastructure. This quantity of housing would mean at least approximately 1,000 people moving into the area. Existing services are already over stretched these include education, health, transport, traffic, social care, shops, employment and social facilities. We have no large supermarkets in the area and this doesn't look like changing anytime soon. Surgery and dental care are already stretched to the limits, to the point we already have to pay for private dental care. We have one school left in the area now Halesworth Middle has closed. Education establishments are already running to full capacity and it is difficult to understand how such a vast uplift in population will be integrated into the existing education system. Parking for only school left is already chaotic and creates problems for other road users. We lack a community centre, sports centre and other leisure facilities. Employment is limited, certainly for professional people. Many people are already travelling out of Halesworth for employment. The existing road structure is nowhere near adequate for what would be a massive increase in traffic. Drainage is also a problem and we understand there is a potential of flooding on this land. Accidents have occurred on Walpole Road, one of which was a fatality. Halesworth is a small market town only with Halesworth only just holding on to its identity such a development on these sites could potentially kill the town and serve only to benefit the land owners and developers. For the above reasons together with the potential negative effect on surrounding properties and wildlife I totally oppose the proposed development of site no's 115 & 116.

#### **Diane Thomas**

I understand that a further application for the development of site 115 has again been submitted via the landowner and possible property developer. The exception it seems is for 420 instead of 430 properties. However I note that site 116 is for a further 560 houses making a grand total of 980!

In September 2007 I submitted my comments to the WDC and Halesworth Town Council on the then Site 168 and to this effect enclose a copy of my notes together with those now referred to as Sites 115 and 116.

My original comments remain but since then there have been additional pressures on the town.

#### **Health and social care**

The present population is already putting extreme pressures on doctors and clinical facilities not least of which is the planned closure of Patrick Stead Hospital. To increase the population by probably at least 1,500 people raises critical questioning of this application. Day and residential care are limited and out of town placements



make contact and support difficult and oft times inappropriate.

#### Education

Since the last application Halesworth Middle School has closed requiring the transport of children to Beccles and Bungay. How would this affect the education of young people from the new estates for surely the dwellings should not be for all retired people?

#### Car parking

The Angel car park is presently under review as a hub for public transport thus reducing parking facilities. Where would the increase of daily shoppers park as walking distances would be in excess?

#### Transport

Public transport varies. The hourly rail service between Lowestoft and Ipswich is good but bus services vary. A volunteer service is a wonderful help but could not be stretched to include the proposed developments.

#### Employment

Continues to be limited and would again demand an increase in road traffic and parking for commuters.

#### Retail facilities

These continue to be limited and would again demand more car users and car parking facilities. The proposed sites are too far removed for people to generally walk/shop.

#### Facilities for waste

Still very limited. No proposal for local facilities thus an increase in possible 'fly tipping'.

#### Site development

The present local road systems are totally unsuitable for such developments and not least would be a real concern for drainage.

Halesworth is a small rural market town. Thanks to the efforts of volunteers some facilities have improved not least for youngsters in the town part and the Millennium Green. However Sites 115 and 116 are quite inappropriate and would serve to benefit the landowner and possible developer. Sites 115 and 116 are not conducive to 'affordable housing' and perhaps an alternative consideration could be given to owners of second/holiday homes so that they could become more available to young families.

Thus for all the above reasons and the effect on surrounding wildlife and the community I totally oppose the applications for the proposed development of Sites 115 and 116 and view these applications as totally unsuitable for such a small market town.

#### ENCLOSURE

RE: PLANNING POLICY, WAVENEY DISTRICT COUNCIL - SITE NO.168

I previously attended a local meeting and exhibition which included plans for the future of Halesworth and I now find further proposals under consideration for the area, amongst which is Site No. 168. This is a site which appears to be in direct conflict with the nature, needs and development of the area therefore I totally oppose this development for the following reasons:

To construct a development of 430 houses would be over and beyond what the infrastructure could cope with or need. 430 houses would mean at least approximately 1,000 people of all ages thus affecting the utility services, health, education, traffic, transport, social care, shops, businesses, employment and social facilities e.g. community centre/library.

430 houses based on today's average = 800+ cars (2 per family). 1,000 people would have need for medical care - present surgery is already over stretched and the hospital facilities are constantly under threat. Dental care is limited with many people already having to go beyond Halesworth for treatment.



Care of the elderly/infirm already under pressure. Limited affordable sheltered housing/care homes/day care available. Help/support via Social Services restricted due to limited finance and/or availability of trained staff.

Education establishments are running to near capacity and pre school facilities are limited. Parking by schools, both pre and after school hours, is creating problems now for other road users.

Car parking already a nightmare so where would the additional car parks be bearing in mind the inclusion of other proposed developments?

Retail facilities are adequate at present, although limited. Where would other retail outlets be placed. Don't forget, not everybody has transport to go out of town!

We still lack a community centre or centre for the young people, for this respect Halesworth appears to be the Cinderella of Waveney District Council and Suffolk County Council. There has already been much debate and arguments, and ultimately no decision reached on this matter which does not bode well for the future of the town.

Employment is limited with professional people in particular and many others already having to travel out of Halesworth which would, in tum with this development, increase vehicles on the road resulting in extra wear and tear on the roads. Where would people work because surely WDC would not wish to see an increase in the retired population?

Thanks to the effect over recent years by groups and individuals in the area an improvement has been made to the present transport system but demands are already increasing. WDC has been slow to acknowledge the problem especially the elected members who generally seem to have little use or understanding of the need for transport.

We are being encouraged to be 'green' but for the present community the nearest waste sites are in Beccles and Southwold. This is quite unrealistic and the constant requests for a 'tip' have been unsuccessful. I would suggest that with a site such as no.168 and other in the region, the problems would increase and just encourage fly tipping.

Although accepting a need for more domestic properties and the Government policy for such developments, Halesworth is a small market town only just holding onto to its identity. It does not portrahit the potential for becoming a large and impersonal area. Such a development as Site No.168 would totally destroy the town and would serve to benefit the landowners and developers only. It would appear that they have no real concern for the social aspects on the infrastructure of the area but rather see this as an opportunity for monetary gain!

Equally, perhaps the Government/Local Councils might care to give consideration to the way local properties have been bought as second/holiday homes for financial gain as seen regularly in this area. This situation has helped increase the price of property thus depriving young and local people the opportunity to remain in the area.

Thus for all the above reasons together with the effect on surrounding property and wildlife, I totally oppose the application for the proposed development of Site No.168.

#### **Lynnie**

Having lived adjacent to this site for 12 years, I have noticed the increase in incidents of flooding of the River Blyth. Building on this area and also site 115 will have an increased impact on this ever increasing problem.

is this site really intended for affordable housing? If so its not ideally located for any amenities within easy walking distance for families who are the prime candidates for such housing. This would mean more unnecessary traffic. If it is not intended for affordable housing, then do we really need more second home owners in the town as they bring little or no benefit to the community or economy. Whoever the occupants



are,mt hey will put further pressure on the already stretched medical amenities in the town.

i am also concerned about the consequences to the vast array of wildlife I have seen on this land since living here...barn owls, marsh harriers, deer, hedgehogs, foxes, hares plus all the songbirds. This over development will have a huge impact on our natural environment and soon we will have no countryside left!

i was born in rural Suffolk...we want it kept rural, not a concrete jungle!!

### **David Winter**

With regard to the "Initial sustainability Appraisal of Emerging Options" paper, the same potential issues have been identified in relation to Site 115 that have been for Site 116. Consequently, our response to these matters for Site 116, at this stage, mirror those we have set out at point 1.11 within this representation document.

The site extends to approximately 18.48 hectares and could accommodate up to approximately 554 dwellings (based on an assumed 30 dwelling per hectare). We appreciate that, given the scale of this site, it may not be preferable for the entirety of the site to be developed. However we consider that the continued availability of the entirety of the site is important in relation any future development to the west of Halesworth more generally, and also because the whole site possesses the required capabilities in order to facilitate considerable residential development, in that it benefits from excellent access and would be relatively easily serviceable.

Development of the site would represent a logical extension to the town along Walpole Road. It is abutted by residential development to the east, and the northern boundary is formed of a public highway. We appreciate that the southern most area of the site is potentially subject to some flood risk, however we would like to confirm that we would not necessarily expect this subject area to be developed out, and perhaps instead that it could be incorporated into a wider development as open space or a community facility of a similar purpose. It should be noted that this area that is potentially prone to flooding comprises only a small part of the overall site.

The site is within the sole ownership of our client and it is considered suitable, available and deliverable in the next 1-5 years.

Subsequent to the above narrative, we consider Site 116 to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation to this site.

### **DC Patrick Newsagents (DC Patrick)**

Yes please when is Halesworth going to restart growing.

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>



### **Halesworth Town Council (N Rees)**

Sites 115 and 116 are beyond the 'natural' end of the town at Dukes Drive. The Walpole Road cannot support a development of 980 extra houses. The infrastructure as in schools, doctors and access to medical care is completely inadequate for any such development. This would be very unpopular with HTC and the residents of Halesworth.

### **Historic England (Debbie Mack)**

Cookley White House, grade II to south west and the Grange grade II to south east. Potential impact on setting of listed buildings.

### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 115 & 116 are outside the village envelope, which should end at Dukes Drive. The existing infrastructure could not support the 980 proposed housing to the north of the town.

## **117 - Land to the west of Laurel Farm, Reydon**

### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development? Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane. Could perhaps add some houses near Pitches View.

### **Julie Church**

When one looks at planning do they take into consideration the actually area. Here in Reydon we are at present a small community, there are very few jobs and the population is mainly middle aged or retired. Many of the homes here are second homes and there are many up for sale. Who will live in these proposed houses, there is nothing for young people, our high school was closed, and our surgery is very busy, with one having to wait 3 week for an appointment.

My view at present (I know I am lucky) is an open field, outside the village boundary. I see beautiful sunsets, owls flying every evening and bats. Birds are nesting in the hedges and the whole field has a look of old fashioned countryside. We now also have a view of Turbines at Holton and Solar panels filling a field.

Is progress always best, look what happened when high rise housing was built, perhaps that is what the council thinks we should have in Reydon????

Building new homes in Reydon, will be beneficial to those selling up from London, but will it really house those who are struggling on family credits?

The whole infrastructure of this area with Southwold, makes it difficult to expand. There is no parking in Southwold and no room to accommodate 100's of new homes, also the Halesworth Road is so busy in the Summer one cannot turn onto it from adjoining roads.

Please take my comments on board. and thank you for the opportunity to have a say on what happens in my



beloved area.

#### **Simon Clack**

As regards the sites to the west and south of Keens Lane (site numbers 138, 116, and 117), I believe that they should all be excluded from any further consideration. The reasons for not developing the Saint Felix playing fields have already been well rehearsed (cf the comments made by local residents and organisations such as Sport England regarding planning reference: DC/15/3288/OUT) and many of the same arguments also apply to site numbers 116 and 117, specifically: a/ the land enjoys AONB status and there seems to be no reason why the Planning Inspectorates' recent decision regarding the proposed Reydon Smere development (cf APP/T3535/W/15/3131802) should not also apply to this area; b/ any vehicular access points from the A1095 would have to be located next to a blind corner or in a blind dip and would increase traffic on an already dangerous stretch of road. Any measures to remedy this situation (i.e. a roundabout) would only serve to further harm the character and appearance of the main gateway to Southwold & Reydon from the south; c/ developing these sites will encourage the landowner to fill-in the area between the solar farm and the Adnams distribution centre; and e/ the sites abut a pair of Grade II listed properties at the end of Keens Lane.

#### **Jean Crook**

Object to building of any sort on this site as it is outside current boundary for Reydon and not necessary

#### **Kevin Cross**

600 homes anywhere around this area would be shocking. Please all Parishes make sure that you have a good Neighbourhood Plan. The idea that there could ever be any building allowed on this land is shocking, and even more so as this proposal seems to be for a whole new estate of up to 600 homes. If that ever happened it would be a catastrophe for the approach to the Jewel in the Crown Town of Southwold, and urbanise yet another main Reydon Road.

#### **Jean Cuffe**

I very much object to houses being built on land opposite Keens Lane, Reydon 117 and 118 on the Southwold and Reydon development plan. The access for a start is terrible there being a hill and a dip in the road making it very much unaccessible. At weekends and holiday times the traffic build up along this road is terrible with cars gridlocked from Reydon corner back to Henham cross roads. What with that plus all the extra cars from this development would be catastrophic. The land is very good pasture land with Barn Owls hunting early morning and evening. They won't be for locals, mostly retired or second homes or holiday homes. All this would put a terrible burden on our already stretched health centre. Because retired people move away from relatives who usually help out when ill. There is much more suitable places such as 142 where the fire station was and the plot opposite 142 which has stood empty derelict and an eye sore for ages. Also plot 26 where all these are on a bus route near shops built up areas with easy access to amenities. There are no facilities at all near plots 118 and 117 its just a very nice rural piece of farming land and way out of the village boundary line.

#### **Graham Denny**

Both these areas are outside the physical / natural boundaries of Reydon and would create "sprawl" out into the countryside. There are other potential areas whilst outside the physical limits are within natural boundaries and do not create "sprawl".



**Margaret Dinn**

I strongly oppose the development of the fields to the west of Keens Lane and the Saint Felix playing fields (sites 117, 118, and 138) as: i/ access to these sites from the Halesworth Road (A1095) would be next to a blind corner or in a blind dip and would increase traffic on a dangerous stretch of road; ii/ developing these areas of AONB land would have a massive impact on a landscape that forms a gateway to Southwold and Reydon; and iii/ developing sites 118 and 117 would create an urban sprawl and no doubt encourage the landowner to seek permission to fill-in the remaining land framed by the Adnams distribution centre and the solar farm

**Peter and Deborah Gillatt**

We do not support the development of plots 117 and 118 west of Keens Lane because such a development would be out of scale to the current village size, swamping it and changing its character detrimentally.

**AR Hall & Sons**

With regard to the "Initial sustainability Appraisal of Emerging Options" paper, the same potential issues have been identified in relation to Site 117 that have been for Site 118. Consequently, our response to these matters for Site 117, at this stage, mirror those we have set out at point 1.17 within this representation document.

The site extends to approximately 19.80 hectares and could accommodate up to approximately 600 dwellings (based on an assumed 30 dwelling per hectare). We appreciate that, given the scale of this site, it is unlikely that it would be suitable or appropriate for the entirety of the site to be developed. However we consider that the continued availability of the site is important in relation any future development at site 118, in order to provide the option to involve some of the land to help facilitate a suitable wider development strategy to the north of Halesworth Road.

The site is within the sole ownership of our client and it is considered suitable, available and deliverable in the next 1-5 years.

Subsequent to the above narrative, we consider Site 117 to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation to this site.

**emma horsnell**

This comment applies to site 117 118 and 138 . i understand there has to be growth . But the school s and others do not reflect this there will be no places in the school Southwold as a town cannot cope with anymore holiday makers and second homeowners . the road system esp the Halesworth Road cannot cope . The traffic gets banked up right past st felix school trying to get into an already unable to cope town in the summer . i cant see a safe way that access for these is going to be found .No highschoools what jobs will there be.Also no supermarket s .Will be too far out of town for most so will have to drive into southwold .

**G D Humphries**

As I have lived in Reydon for a great number of years I have seen the village grow in size, and if not careful the village atmosphere would change. As for the proposed site near Keens Lane a most dangerous road to come out onto the Halesworth Road at any time of year. It would mean more cars on the already stretched roads. Also like all developments second homes for people outside of the area. Too many houses mean over



development, and ruin the atmosphere of such a lovely area. One can see what happened to our neighbours in Southwold as a victim of its own success. Nearly all second houses priced out of young people's reach. Parking in the summer time is hopeless. Shops trying to find people to work in them. Even the prices of Reydon property is going up and up as people struggle to afford Southwold prices, and even Reydon now has many holiday homes. It must retain the countryside aspect, without becoming a concrete jungle.

As for building on St. Felix School playing fields that should be removed completely from consideration. It would spoil the whole outlook. Enough houses were built when St. George's Square was built. Enough is enough otherwise there is no end to development in the area.

As there is very little work apart from seasonal and retail it means more second homes which is ridiculous. More homes more traffic it is bad enough now. It would be a great shame to see the playing field built on, and lose more of the countryside that makes Reydon a village atmosphere. There is no industry here and prices are so high most of the young people move away, and you need a mixture of both young and old.

Do we need anymore development the answer is no. If we keep building at this rate all the villages will be joined up. Also with trees and countryside we have the pleasure of wildlife. Owls, bats and birds, and more.

#### **Kevin Kinsella**

Developing the land to the west of Keens Lane (690 homes in total) is wholly unacceptable, as that would completely alter the character of a town with a current population of around 2,500.

#### **Julian Lawrence**

I think that scenario 1 option 1 would be more than enough for this area

Reydon and southwold have plenty of brown field sites and in fill sites earmarked already. For housing .This area is an area of ONB and encroaching on more green land is ludicrous. The services and utilities cannot cope as it is. Water /sewage is overstretched. the doctors dentist and school etc. has waiting lists and long waits for appointments already. Children are already being bussed out on mass as no secondary school. Traffic into Swold and area is nonstop already on the Halesworth road and people in Keens lane and area already find it a problem to access the road. This would add to mass overdevelopment for a village that is at the edge of nowhere with hardly any employment .where would all of the people work ,They would have to commute adding to more pollution ,road chaos and congestion .There are already enough second /holiday homes also in area so we do not need more of them either. Please be realistic about the future plans at least and choosing sites a community that just copes with its services and utilities and employment would be overwhelmed and change it completely.

#### **Sally Macnab**

As this is an AOB the building of housing in this area and 118 would be contrary to the provisions of an AOB. Waveney District Council counts Southwold and therefore Reydon because of the unique relationship as the jewel in the crown, if this is to continue then housing needs to be kept to what is genuinely needed and preferably using brown field site that will improve the area. Southwold is reliant on its tourism, the gate way is Reydon and therefore this area needs protecting. All of Waveney benefits from the tourism. The infrastructure of Reydon and Southwold (gas, water, drains, food shops and **car parking**) could not cope with large scale housing developments.

#### **Mr & Mrs McNally**



We attended the meeting on Tuesday 10 May to view the Waveney Local Plan. We were surprised to see so many homes planned for Reydon. Is there really a need for this amount of extra housing in this area?

We asked the Planning Officer if the necessary infrastructure would be put in place prior to or at the same time the homes would be built. We were shocked to be told that this would not be the case and their remit was just to build houses and there was no link up with any necessary services. We pointed out that there are currently long waiting times for appointments at the Health Centre and treatment times at the James Paget A&E are below targets. The Planning Officer said that shortage of doctors is a nationwide problem and any improvements needed cannot be part of the housing development plan. There also appears to be no firm plans proposed for more school places, jobs, shops, sewage capacity etc. for the 972 homes mentioned.

It would appear that the area will be overdeveloped to provide housing with no thought for the well being of existing or new residents. Surely this cannot be right and we are writing to ask what action you will be taking.

There is also the concern that a lot of the new property will be second homes and holiday lets and wonder if you will be considering adopting the St Ives ruling of not allowing this type of person to purchase new properties. This would make it less attractive to developers to build such large housing developments.

One last point when does a village enlarge so much to qualify to become a town?

**Pamela Morris**

Please delete areas in 117, 118, 138

All these are large areas and all off the very busy rural A1095. Any development in any one of these areas would be in excess of the % new dwellings sought and would change a village to a town. This is an area where affordable homes are not required; developers would building houses as holiday or second homes for excess profit. Very many other reasons could be given.

**Mr Parke**

Unsuitable. Urban development in an AONB.

**Ruth & John Pigneguy**

Many residents have moved here to live in a semi-natural area. These sites look like massive over-development. Second homes need to be controlled so that we can have local full time residents living here.

**Andrew Pitt**

I do not think it is in the best interest of the local community to build beyond the existing settlement boundary of Reydon. There are many reasons for not building on particular sites; environment and economic. The main reason, however, is that surrounding Reydon with housing with developments which will inevitable become holiday home ghettos is not in the best interest of permanent residents or the region in general if it is to continue to attract tourists.

I think most residents would support the building of new homes on in-fill/brown field sites within the village, as long as there is a method of ensuring the houses are for permanent occupation - not investment opportunities as holiday homes. It is the responsibility of local councils to ensure any future development is for local people who intend to live and work here, and not supply houses which, in the long term, change the



balance of the population so that Reydon becomes, like Southwold, little more than a holiday village.

### **John Reaney**

This comment relates to field represented as 'site 117' and adjoining arable farmland referred to as 'site 118'.

The field (site 117) is separated from adjoining farmland (site 118) by an ancient hedge and a beautiful line of oak trees that create a wonderful pastoral view for anyone leaving or coming into Southwold on the Halesworth Rd. Also, the field, which is full of wildflowers in the summer, lends to the west side of Reydon a true country feel which makes it such an attractive place for residents and visitors to both Reydon and Southwold.

To build on this field (site 117) would have a hugely detrimental impact on environs of Reydon and considerably lower the quality of life of the residents in Keens Lane and the adjoining roads.

The building of 90 houses on this site would place a huge strain on existing utilities, especially sewage. Also there would be greater pressure placed on the sensitive heathland in the AONB near the marshes as these are likely to be visited by many more people due to the additional people living nearby this site and at site 118 (600 houses proposed).

I believe that all additional housing needs can be accommodated by utilising existing brownfield sites such as the redundant police station, fire station, garage and telephone exchange building. Also, land that is being sold by the local church will also be available for building houses.

### **John Reaney**

This comment relates to the arable farming land referred to as 'site 118' and partly to the adjoining field referred to as '118'.

The farmland (site 117) is part of rolling pastoral landscape, which when viewed from the edge of Reydon, affords one of the most beautiful views in the county. Looking westward from Reydon on the Halesworth Rd., the eye is taken from the line of oak trees separating this site and the site 118, across the undulating fields of site 117 to the tower of St. Margaret's Church on the Wangford Rd. and then to the beautiful untouched countryside beyond. This view, which matches anything found in 'Constable' country around Dedham would be utterly destroyed if houses were built on this land.

Another aspect of the land of site 117, is that it can be so easily enjoyed by the public by walking along the lovely footpath that starts from the end of Keen's Lane and ends at St. Margaret's Church following the eastern boundary of site 117. Along this path there is an ancient hedgerow that terminates at the northeast corner of the site 117 where there is a glade of trees containing a pond. The footpath, because it well away from any built up area, is a wonderfully peaceful place to be, where one can listen to and observe the birds flitting from branch to branch amongst the trees that grow beside the hedgerow.

To build houses on site 117 (and adjoining site 118) would represent a huge loss of amenity to the residents of Reydon and to visitors to the area and could have a seriously detrimental effect on Reydon and Southwold as holiday destinations. No longer, would Southwold be seen as seaside town at the edge of the lovely Suffolk countryside; instead it would be viewed as place in the middle of a large conurbation which would, like so many other seaside places in the UK, be rather avoided by many people, who would prefer to holiday abroad.

The building of 600 houses (as indicated on the Waveney development plan map) would place a huge strain on existing utilities, especially sewage. Also there would be great pressure placed on the sensitive heathland in the area of AONB near the marshes as these are likely to be visited by many more people due to their easy access via Shepherds Lane.



To construct nearly a 1000 houses on the sites around Reydon makes no sense due to the poor road links to Southwold and Reydon, and to the already overburdened utilities within this area. (Many residents have had problems with sewage disposal and power cuts often occur due to overloaded power lines). If there was really a need for an extra 1000 houses, then the planners should be looking at a new village/town near to the A12. (The A12 should also be improved by making it dual carriageway all the way from Ipswich to Lowestoft and there should be in addition a high speed rail link between the two towns).

I believe that all additional housing needs can be accommodated by utilising existing brownfield sites such as the redundant police station, fire station, garage and telephone exchange building.

#### **Charlotte Sanderson**

The scale of this development would place an unacceptable strain on the local infrastructure, resources and environment. The occupants would mainly be reliant on their car for all aspects of their lives. Where would they work?

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

##### Source Protection Zone 1

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Historic England (Debbie Mack)**

Gorse Lodge Farmhouse Grade II to east. Potential impact on setting of Listed Building

#### **N/A (Kerry Pace)**

The sheer scale of this proposition is beyond excessive. This would impact negatively on the whole area, and the effects would be widespread; the increased traffic, the environmental impact, and the overburdening of public services would be key issues. The general area would be changed beyond recognition and would result in a very 'built up' feeling.

Who would buy these homes? Is there a need for so many locally? No is the short answer. Although all the potential sites may not be built upon, it seems that Reydon has been particularly singled out for massive development which (apart from the considerations already mentioned) would render the place completely charmless.

The tourist trade is obviously really important to the area, and the entrance into Southwold would be impacted severely by the resulting additional traffic. The numbers are totally disproportionate to the local needs and population.



### **Reydon Parish Council (Jean Brown)**

[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

### **Southwold and Reydon Society (Philip O'Hear)**

This extremely large site is remote from the boundary of the settlement of Reydon and in open countryside which is part of the AONB. It would, of course, only make sense to develop this site if the adjoining site to the east was also developed. This would thus add some 700 or more houses to the village - an extremely significant increase in its size.

The road and sewage infrastructure are simply inadequate to deal with expansion on this scale.

Moreover, there is absolutely no need for development on anything approaching this scale if the targets for new houses in Southwold and Reydon are to be met if the major growth in the District is based in and around Lowestoft. This makes most sense economically and in terms of regeneration and is our preferred option. The target for Southwold and Reydon can then be met by small scale development within the settlement boundaries or close to them along the line of the current Rural Exceptions Policy (DM22) for affordable housing.

## **118 - Land to the west of Laurel Farm (primary area), Reydon**

### **Anonymous**

Key Questions Q5 Are there any areas of land you think are suitable or not suitable for development? Reydon - Rissemere Land and Easton Bavents are unsuitable - also the field across from Keens Lane. Could perhaps add some houses near Pitches View.

### **Simon Clack**

As regards the sites to the west and south of Keens Lane (site numbers 138, 116, and 117), I believe that they should all be excluded from any further consideration. The reasons for not developing the Saint Felix playing fields have already been well rehearsed (cf the comments made by local residents and organisations such as Sport England regarding planning reference: DC/15/3288/OUT) and many of the same arguments also apply to site numbers 116 and 117, specifically: a/ the land enjoys AONB status and there seems to be no reason why the Planning Inspectorates' recent decision regarding the proposed Reydon Smere development (cf APP/T3535/W/15/3131802) should not also apply to this area; b/ any vehicular access points from the A1095 would have to be located next to a blind corner or in a blind dip and would increase traffic on an already dangerous stretch of road. Any measures to remedy this situation (i.e. a roundabout) would only serve to further harm the character and appearance of the main gateway to Southwold & Reydon from the south; c/ developing these sites will encourage the landowner to fill-in the area between the solar farm and the Adnams distribution centre; and e/ the sites abut a pair of Grade II listed properties at the end of Keens Lane.



**Ms crook**

This land backs onto Keens Lane a private road, this lane at the best of times is practically impossible to exit/ enter due to large amounts of traffic on the Halesworth Road entering Reydon ( turning right out of lane is very dangerous ) peaking during summer months to a near stand still from Southwold to St Felix School. Building a possible 761 houses (sites 118/117/138) off the Halesworth Road would make this situation impossible. Traffic chaos. The infrastructure in Reydon could not cope with such large increases in housing, roads, schools, shops, parking. Who would these houses be for, affordable houses for locals ? As with all the others that have been built before, sold on to second home owners and holiday lets. If all the second homes/ holiday lets in Reydon/ Southwold had been prevented there would be no need for new houses to be built especially on AONB, supposedly protected, land.

**Jean Crook**

Object to any building outside the current boundary of village, this site is far too large and would attract second home owners and not support local people to buy properties in the local area. Access to this site would be from the main road into Southwold which is busy and dangerous, there would be no access from Keens Lane which is a private road.

**Jean Cuffe**

I very much object to houses being built on land opposite Keens Lane, Reydon 117 and 118 on the Southwold and Reydon development plan. The access for a start is terrible there being a hill and a dip in the road making it very much unaccessible. At weekends and holiday times the traffic build up along this road is terrible with cars gridlocked from Reydon corner back to Henham cross roads. What with that plus all the extra cars from this development would be catastrophic. The land is very good pasture land with Barn Owls hunting early morning and evening. They won't be for locals, mostly retired or second homes or holiday homes. All this would put a terrible burden on our already stretched health centre. Because retired people move away from relatives who usually help out when ill. There is much more suitable places such as 142 where the fire station was and the plot opposite 142 which has stood empty derelict and an eye sore for ages. Also plot 26 where all these are on a bus route near shops built up areas with easy access to amenities. There are no facilities at all near plots 118 and 117 its just a very nice rural piece of farming land and way out of the village boundary line.

**Graham Denny**

Both these areas are outside the physical / natural boundaries of Reydon and would create "sprawl" out into the countryside. There are other potential areas whilst outside the physical limits are within natural boundaries and do not create "sprawl".

**Margaret Dinn**

I strongly oppose the development of the fields to the west of Keens Lane and the Saint Felix playing fields (sites 117, 118, and 138) as: i/ access to these sites from the Halesworth Road (A1095) would be next to a blind comer-or in a blind dip and would increase traffic on a dangerous stretch of road; ii/ developing these areas of AONB land would have a massive impact on a landscape that forms a gateway to Southwold and Reydon; and iii/ developing sites 118 and 117 would create an urban sprawl and no doubt encourage the landowner to seek permission to fill-in the remaining land framed by the Adnams distribution centre and the solar farm

**Jim Elmes**



Access onto Halesworth Road may be difficult.

### **Peter and Deborah Gillatt**

We do not support the development of plots 117 and 118 west of Keens Lane because such a development would be out of scale to the current village size, swamping it and changing its character detrimentally.

### **G Golding**

Site 118 is outside the built-up area and the village boundary, both in contravention of planning rules, is green belt, in an Area of Outstanding Natural Beauty, has significant archaeological interest and would also damage the approach to Southwold, and would adversely affect the dwellings in Keens Lane and adding more traffic to already a busy and dangerous road.

### **AR Hall & Sons**

The “Initial sustainability Appraisal of Emerging Options” paper is encouraging in that the only negative points identified relate to;

- (A) “conserving and enhancing the quality and distinctiveness of landscapes and townscapes”
- (B) “reducing contributions to climate change and mitigate effects”
- (C) “Conserving natural resources”

In response to item (A), whilst this is certainly a matter for consideration, we believe this potential issue can be addressed by the implementation of strategic landscaping in association with any future development, as well as the inclusion of attractive open space. With regard to items (B) and (C), considering Site 118 is Greenfield land, it is often the case that potential issues can be identified in relation to these matters, however given the scale of the site, and it’s proximity to Site 117 (which we have also been submitted on behalf of our client) we believe that a potential development could be designed to involve particular features and infrastructure improvements to mitigate and counteract these potential issues.

The site extends to approximately 2.95 hectares and could accommodate up to approximately 90 dwellings (based on an assumed 30 dwellings per hectare). The site is within the sole ownership of our client and is considered suitable, available and deliverable in the next 1-5 years.

Development of the site would represent a logical extension to the village along Halesworth Road. It is abutted by residential development to the east, and the southern boundary is formed of a public highway. As mentioned previously within this representation, the land to the west is also owned by our client, and further details regarding that site are set out overleaf.

Given the site’s situation, we believe that it’s development would certainly be suitable as it is easily serviceable and is adjacent to an existing public highway, making the provision of access to the site relatively simple. Given it’s position, to the west of the centre of the village, potential associated traffic congestion issues would be minimal.

When considering potential employment growth within Waveney and it’s surrounding districts, it is important to realise that Reydon is situated only approximately 16.7 miles to the north of Sizewell, an area where there is likely to be considerable employment growth over the coming decade. Consequently, we believe that the site’s relative vicinity to this employment growth area helps to improve it’s sustainability.

Subsequent to the previous narrative, we consider the site to represent a sustainable opportunity for development and we look forward to continued engagement with the emerging Local Plan process in relation



to this site.

### **G D Humphries**

As I have lived in Reydon for a great number of years I have seen the village grow in size, and if not careful the village atmosphere would change. As for the proposed site near Keens Lane a most dangerous road to come out onto the Halesworth Road at any time of year. It would mean more cars on the already stretched roads. Also like all developments second homes for people outside of the area. Too many houses mean over development, and ruin the atmosphere of such a lovely area. One can see what happened to our neighbours in Southwold as a victim of its own success. Nearly all second houses priced out of young people's reach. Parking in the summer time is hopeless. Shops trying to find people to work in them. Even the prices of Reydon property is going up and up as people struggle to afford Southwold prices, and even Reydon now has many holiday homes. It must retain the countryside aspect, without becoming a concrete jungle. As for building on St. Felix School playing fields that should be removed completely from consideration. It would spoil the whole outlook. Enough houses were built when St. George's Square was built. Enough is enough otherwise there is no end to development in the area.

As there is very little work apart from seasonal and retail it means more second homes which is ridiculous. More homes more traffic it is bad enough now. It would be a great shame to see the playing field built on, and lose more of the countryside that makes Reydon a village atmosphere. There is no industry here and prices are so high most of the young people move away, and you need a mixture of both young and old.

Do we need anymore development the answer is no. If we keep building at this rate all the villages will be joined up. Also with trees and countryside we have the pleasure of wildlife. Owls, bats and birds, and more.

### **Kevin Kinsella**

1Developing the land to the west of Keens Lane (690 homes in total) is wholly unacceptable, as that would completely alter the character of a town with a current population of around 2,500.

### **Julian Lawrence**

I think that scenario 1 option 1 would be more than enough for this area

Reydon and southwold have plenty of brown field sites and in fill sites earmarked already for housing .This area is an area of ONB and encroaching on more green land is ludicrous .The services and utilities cannot cope as it is. Water /sewage is overstretched ., the doctors dentist and school etc have waiting lists and long waits for appointments already. Children are already being bussed out on mass as no secondary school. Traffic into Swold and area is non stop already on the Halesworth road and people in Keens lane and area already find it a problem to access the road. This would add to mass overdevelopment for a village that is at the edge of nowhere with hardly any employment .where would all of the people work ,They would have to commute adding to more pollution ,road chaos and congestion .There are already enough second /holiday homes also in area so we do not need more of them either. Pease be realistic about the future plans at least and choosing sites a community that just copes with its services and utilities and employment would be overwhelmed and change it completely .

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Unacceptable urbanisation of rural landscape in an AONB.

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Many residents have moved here to live in a semi-natural area. These sites look like massive over-development. Second homes need to be controlled so that we can have local full time residents living here.

**Historic England (Debbie Mack)**

Gorse Lodge Farmhouse Grade II to north. Potential impact on setting of Listed Building

**Reydon Parish Council (Jean Brown)**

[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

**Southwold and Reydon Society (Philip O'Hear)**

This site lies on one side of an unmade road and is in the open countryside which is part of the AONB. It is not suitable for development due to its location in the AONB and also because of the very significant difficulties that would arise to create safe access for the traffic generated by this development to the busy Halesworth Road. The sewage infrastructure in Southwold and Reydon is at or beyond capacity which is a further reason for rejecting this proposal.

Most important of all, however, is that no large scale development such as this is needed in Southwold and Reydon to meet the target number of new homes required in the area if the option is adopted to concentrate the District's needed growth in and around Lowestoft which we regard as the best option on economic and regeneration grounds.

## **119 - Land to the west of St Edmunds Church, Kessingland**

**Janis Roberts**

Why on earth would you build on green belt when the old Ashley nursery site sits empty and derelict? Start destroying green belt and you destroy our beautiful land for future generations.

**Historic England (Debbie Mack)**

Adjacent to Church of St Edmund grade I listed. Potential impact on setting of high grade listed building.

**Kessingland Parish Council**

With regards to site 85 (Rider Haggard Lane), site 109 (London Road) and sites 119 and 125 (Church Road) – none of the landowners came forward during the 4 years that the Neighbourhood Plan has been in progress,



except the owner of sites 119 and 125 (part of these sites are being used as allotments), who stated that they didn't want to be part of the Neighbourhood Planning process. These two sites which are south of Church Road are part of the Area of Outstanding Natural Beauty (AONB) bordering the Kessingland Levels, and are not sites suitable for development.

Excluding site 41, which has been included in the Neighbourhood Plan, these 4 sites in total would bring forward 100 homes.

The Neighbourhood Plan, which is as a result of 4 years consultation with landowners and the local community brings forward 3 sites which would bring forward a total of 105 homes plus in the case of site SA1 a commercial incubator facility, in respect of site SA2 a new playing field recreation area extension and in the case of SA3 affordable homes held in perpetuity for the residents of Kessingland.

Therefore the 4 sites put forward in the Waveney Local Plan are considered to be surplus to the requirements of Kessingland, the 'Housing Needs Survey' figures are more than covered by the Neighbourhood Plan proposals, which should be included in the Waveney Local Plan in preference to the other sites put forward.

#### **Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 41; 85; 109 and 119 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

### **120 - Land west of London Road, Wrentham**

#### **Kevin Cross**

20 Homes in this location seems like a great idea to me. I live in the village and would be in favour.

#### **Benacre Estates Company (Edward Vere Nicoll)**

Land to the west of London Road, Wrentham, was submitted to the Council's Call for Sites in October 2015.

The site is located to the south west of the village and is enclosed by residential development to the north, south and south east. It is not constrained by any landscape or flood risk designations (as identified on the adopted Proposals Map (2012) and Environment Agency Flood Maps). It is anticipated access will be taken from the A12 which forms the eastern boundary of the site.

The site is within the sole ownership of our client and it is considered suitable, available and deliverable in the next 1-5 years.

#### **Historic England (Debbie Mack)**

Proximity of several grade II listed buildings including County Primary School and walling, Clyfton House and 30 - 32 London Road. Potential impact upon setting of Listed building.

#### **Wrentham Parish Council (Frances Bullard)**



As a Parish Council we would ask that previous concerns re density, infrastructure, recreational space, parking & increased traffic are taken into account when any planning application is considered for this site.

### **121 - Land west of Moores Cottages, Holton**

#### **Halesworth Town Council (N Rees)**

Similarly, Sites 73 and 121,103, 148 are classified as Holton and HTC and Holton would need to look at this together.

#### **Historic England (Debbie Mack)**

Proximity to Moat Farm house, grade II. Potential impact on setting of listed building.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 73; 121 Both these sites look to be outside the village envelope but there is already a 'local community' in this area and an innovative, environmentally designed scheme for local need could be considered.

### **122 - Land west of Norwich Road, north of Old Station Road, Halesworth**

#### **Tony L**

If more land needed after the 'Tesco' site and Dairy Hill developments, this would be one of the better options and is easier walking distance to town than some.

#### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

#### **Halesworth Town Council (N Rees)**

Site 122 with the potential of 150 houses, site 106 with 27 and site 140 with the potential of 30 houses is an area where drainage and water and sewage have already been raised as potentially problematic. 207 houses is far too many. Site 141 is in Wissett and this would add another 30 houses, making 237 in all. The Wissett Road is heavily used and would be inadequate if these houses were erected. The traffic on Wissett Road is a potential hazard for the pupils of Edgar Sewtwer School now, this development would make it much worse. Similarly the infrastructure of school places, doctors' surgeries and the current sewage system would all need



considerable improvement.

#### **Historic England (Debbie Mack)**

Wissett Place, grade II located to south east of site. Potential impact on setting of listed building.

#### **Hopkins Homes**

Following the previous Representations made to the 'Call for Sites' Consultation in January 2016, Hopkins Homes would re-affirm the suitability of Site 122 to provide for sustainable housing development, incorporating new public open space, as detailed upon the previously submitted Feasibility Layout Plan.

The site lies in a highly sustainable location, within walking distance to the town centre and railway station and is surrounded by built development.

The 4.9Ha site is suitable to accommodate a development of approximately 150 dwellings, together with new public open space. Vehicular access can be gained from the A144 Norwich Road, with pedestrian linkages also available through to the existing public open space to the north of Old Station Road.

Feasibility sketch and site boundary attached.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 122 encroaches on the buffer zone between the industrial site on Norwich Road and housing on Old Station Road. This site also has major drainage implications.

### **123 - Lock's Road, Westhall**

#### **Cubitt**

Westhall is a village of ribbon development and the proposed type of development would be a departure, and change the character of the village. There are a number of existing sites available for ribbon development that should be utilised before any development of this type is considered.

The road connections to Westhall are of poor quality and whilst they may not need widening the quality of the roads should be reviewed and upgraded before such development is considered

Sewerage treatment services have not changed for many years and would probably need investment prior to further development

#### **Kevin Grantham**

The potential development site behind Locks Road, Westhall would create the following problems and my family strongly objects to the development on site 123:

1. There is a lack of suitable access roads and paths to accommodate the additional houses. The roads and paths are already below the standards needed, especially with the large commercial and farm vehicles regularly transiting through the village. There is already a risk to pedestrians travelling around



the village due to the inadequate infrastructure. The risk of a foreseeable serious injury or fatality in the village would certainly be increased.

2. The school is at capacity and would be unable to accommodate additional children.
3. There is no suitable gas main into the village, therefore more HGV oil Lorries would be needed to serve the community.
4. The sewage system is at capacity and would be unable to cope with the additional load. Some houses do not have mains sewage already in the village.
5. There is already inadequate internet access in the village, additional houses would make this even worse.
6. Limited local employment would make the rural roads even more congested and dangerous during the commuter periods.
7. We purchased our house for its rural setting and field views etc. This development would certainly destroy this. On purchasing our house we checked about future developments with the relevant authorities and farmer concerned, both confirmed that future development would not happen.
8. There are other sites in the local area which are nearer the main roads with better infrastructure which could be developed if required.

### **Stephen Gray**

A potential development of 37 houses would increase the size of our village by 26% which the sewers, roads etc cannot cope with, also there is no mains gas and internet access is poor. Our village has already been blighted by the nearby wind farm which would put off potential purchasers anyway. It is debatable if there is the demand for such a large no. of houses in a village with very poor transport link, no school and poor public transport.

### **Stacey Howlett**

We do not agree with having more houses in Westhall, we may have a shop and a pub, but the roads can not withstand any more people or traffic, you only have to look at the destruction of the verges in the main part of the village to see the damage that already occurs with the volume of traffic we have already.

With the level of cars and the huge buses that come through, the buses are completely unsuitable for our small roads, the farming tractors and equipment are getting bigger and HAVE to come through the village, it wouldn't be the first time a tractor has not been able to get through because cars are in the way.

We do not have a school in the village or any form of employment, which means traffic constantly in and out of the village for these purposes, the roads only have a small number of layby's to get through as it is, if more cars come in, you are not going to be able to move, we do not the facilities or roads to be able to take any more traffic - if we were talking a couple of houses it would be different - BUT 37 houses, probably families, so 2 cars per house (1 for mum & 1 for dad) that is an extra 74 cars, plus visitors.

I live in a quiet village as a choice, I do NOT want more houses, the village is completely unsuitable for this - I don't care how much money is going to go in someone's pocket, I do not want to look out on houses, if I did I would live in a town.

### **Katie Johnson**

I am concerned with the news of the potential housing development in Westhall. A development of 37 homes will spoil the village. It's greedy of the developer to request so many! I understand that there is a need to build new homes but why does it have to be in this quantity? Westhall does not need a housing estate;



instead I ask the developers to take a clear look at the village and how the houses are sparsely situated. 5- 10 houses would have my full support if built in a position that would not spoil the landscape and upset those living close by. The village is prone to frequent power outages, has slow broadband and drainage. The roads are also narrow and have limited adequate passing spaces. Has anything been thought of this?

### **Anna Jordan-Smith**

As a resident of Locks Rd we enjoy very much the farm fields and outstanding views over the fields beyond. We have all purchased a home with a beautiful view to enjoy which will be destroyed by the injection of some many new homes.

This field is a haven for wildlife, birds and helps maintain the tranquility of the village. An increase of this many houses will create a lot more noise and all in a very condensed area of space. There will be little space inside of the village for animals to come free.

This village does not have the infrastructure to maintain any substantial increase in road use which an increase of over 30 homes to a small area will create. Our roads are very small and there is very little of our roads where two cars can pass on the road side by side. This is never more evident than coming into the village at both the north and south ends. In fact outside the potential site the road is small.

However this perfect for the villages at present, it maintains a slow flow of the little traffic we have. This would be a lot with increase of the cars servicing the new homes.

It would be a massive shame to lose the space we have and the atmosphere we are lucky to have and appreciate in our small village. It is a very large injection of housing in a very small space.

I am sure I speak for many others who object to this potential Project, from Locks Rd and all other places within the village.

### **Lorraine Knight**

I consider this site to be completely unsuitable for development!

To put these houses on this site would be equivalent to creating an estate in a rural location!

There simply is not the infrastructure in place in this small village:

- ▶ small sewage works
- ▶ small local shop
- ▶ small school on outskirts of village not within walking distance
- ▶ no employment as completely rural
- ▶ no gas supply
- ▶ poor internet access
- ▶ narrow lanes & roads ( higher & wider farm vehicles regularly use these, as do existing residents, delivery drivers & commuters to avoid the A 12)
- ▶ no train station

The population is aware that new development maybe inevitable, but where people are not adding to a location but commuting away from it, surely it would be more appropriate for ribbon development, infilling



small spaces on the OUTSKIRTS where amenities are already available and access to main roads, train stations etc is already in place!!

**Patsy Knight**

Westhall Site 123 - potential land for development 37 houses in Locks Road is just ridiculous, the roads are too narrow and even now with the traffic flowing through buses/tractors, they are all tearing up our grass verges. There is no infrastructure for future development. One shop and a pub which keeps on closing and re-opening, who is to say they will both be here next year. I am not against development a few houses each year in Westhall is fine, but not mass development. I love this village and do not want it turned into a sprawl.

**Belinda Lee**

I bought my home for the lovely field view at the back, if the 37 homes are built this will be spoilt.

the same proposal was turned down 10 years ago so can anybody tell me what has changed ??

we still have the same sewage works. the same small shop and small school outside of the village

we have NO gas in the village the roads are still the same, and we still have poor mobile signal and internet

so with 37 new homes will all the roads be upgraded to a standard which would accommodate the volume of traffic to a safe standard

**Christopher Lynch**

Nothing has changed since the previous failed application to develop this site 10 years ago, we have same infrastructure supporting the Parish, but added demands since that time of:

a) greater traffic density

b) higher demand for drainage, with many drainage ditches lost

c) increase in delivery vehicle e.g. Internet sales/no gas supply, therefore greater reliance on oil tender deliveries

d) narrow roads with a lack of suitable passing places/damage to roads and verges

e) no school within the Parish/more school bus transport

f) medical facilities at bursting point

Regards,

Chris & Valerie Lynch

**Edward Lynch**



I would like to please express my concern regarding the proposed development along Lock's Road in Westhall. I feel that the proposed number of properties would have an adverse effect on the character of the village and that the narrow rural roads would struggle to cope with the increase in traffic.

**Mr Lynch**

Dear Sir/Madam,

I would like to comment on the proposed site for housing development on Lock's Road, Westhall (Numbered 123).

I believe that the site is unsuitable for housing development due to the lack of infrastructure supporting the village. The village is accessed only by single lane rural roads and are already busy with traffic from the current residents, large farm vehicles and other delivery vans. There are also minimal services provided in the village with there being only a small shop, a very poor internet connection, no gas supply and infrequent public transport. A lack of local employment opportunities would mean that any new residents would have to travel a minimum of five miles to the nearest town or ten miles to the next. No school within walking distance would also increase road traffic and limit opportunities for children. An absence of sewage/water treatment works and drainage provision that could cope with extra housing is also a concern because when there is heavy rain the current roads flood quickly.

Regards.

**Helen Marr**

Most villages need 'new blood' and Westhall is no exception. However, it is clear that the present infrastructure and services are not sufficient to accommodate more properties, let alone the number suggested. The village is already under pressure due to increased traffic, verges destroyed due to larger farm vehicles and parking problems, further housing would only exacerbate these problems.

**Mark and Joy Moore**

As long time residents of Locks Road we wish to state that we strongly oppose the proposed housing development in our road. There are no amenities such as sewage and gas etc. and in our opinion would destroy the fabric of the village.

**Peter and Ann Mulley**

We oppose the proposal to build 38 houses on this site. 38 is in excess of what is widely considered to be the amount of new housing that can be successfully integrated into an existing community of this size.

The local infrastructure is far from adequate and would require considerable investment in:

Sewerage treatment capacity.

Narrow roads already stressed by more and larger farm traffic, increased use by commuters, present resident children using car ownership age.



Schools not just the local primary at the next village of Ilketshall but also the secondary at Bungay.

Very poor internet access.

**Anne O'Connor**

We would like to voice our concerns regarding the proposed building of over 30 houses in the land behind Locks Road.

Our house backs onto the proposed development, so from a personal viewpoint we are concerned that it will spoil the open rural view at the rear of our garden which we have enjoyed since moving into our house almost 20 years ago.

From a more objective viewpoint, we think that the relatively large number of houses proposed would be too great for the local infrastructure to cope with.

We understand that the current population increase means that more houses are needed. In the case of Westhall it would be more appropriate to build small numbers of houses on a few different sites. This would better maintain the character of the village and new residents would find it easier to be absorbed into village life rather than all be clumped together on the edge of the village.

**Madeline Prasser**

It would be ridiculous to allow this many homes to be built in our small village. We already struggle day to day on the roads, which are all single track with passing places (and even more dangerous at this time of year when the verges are very high and visibility is awful, many near misses). Roads aren't in particularly good condition and would be made even worse with an additional 70 odd vehicles using them. Internet provision is poor as we are so far from the exchange, without the possibility improvement in the foreseeable future. Children have to be bused to nearby schools. There just isn't the infrastructure in place to cope with this many additional homes. At the moment we do have a Village Shop, but it is unlikely to remain once the current shop keeper retires, he is 91 this summer! No mains gas supply and also the sewage works are apparently at capacity.

From a personal point of view, we chose to live in our house because of the beautiful outlook to the rear, overlooking rural fields. I think I share the view, certainly of ALL of the residents along Locks Road, that this would completely ruin our houses. I moved here to NOT be overlooked and if houses were put on the proposed site we certainly would be. It would definitely cause a loss of value to current properties.

I am not against any development in the village, but there must be better sites and for a fraction of the amount of houses i.e. 5 or 6!

Houses were turned down on this site because of these very reasons 10 years ago and NOTHING has changed.



Please, please do not consider this site a possibility. You will completely ruin our village.

### **Kevin & Mary Roe**

A similar proposal for 44 houses in the same location was turned down 10 years ago! Since then NOTHING has changed!

The village has the same infrastructure

? same small sewage works and many existing properties not on mains drainage

? small village shop

? no school in village - nearest primary school 3 miles away not within walking distance

? no employment at all as completely rural

? no mains gas supply to village (this would necessitate more oil tankers delivering)

? already poor internet access

? all lanes rightfully narrow as this is a rural location

? traffic would increase on these rural roads as additional people commute out of village to work and schools

? there is already an increase in traffic from existing growing families within the village

? roads in the village already becoming more dangerous with higher and wider farm vehicles and commuters already

Using the village as a cut through to the A12

? we live at number 1 locks road with a blind entrance which is already dangerous to come in and out of with existing traffic volume - extra village volume will cause concern regarding childrens' welfare when going out and about in the village.

? we have lived here for 21 years and in this time we have already seen our verges and hedgerow eroded by existing traffic with a potential 37 more properties with an average of 2.vehciles each this can only get worse!

? this village prides itself with a quiet safe community and the ability to let our children play out 'in the old fashioned way,"

? our country roads are already full of pot holes and uneven surfaces, which aren't maintained satisfactorily to cope with current traffic volume - surely money would be better spent maintaining what we already have rather than putting further strain on resources throughout our village!

? why doesn't the farmer put in for planning for new houses next to his own home in his own village ?



**karen smith**

No gas in the village so more oil tankers Narrow rural lanes in and around village Same small sewage works No employment at all as rural Small school and have to wait for places Fram vehicles regularly using theses roads there as wide as the road Poor mobile access Poor internet access The opening to the site is only wide enough for one car Water pump house in Halesworth needs up grading to take more housing

**Donna Southwell**

I would like to express my concerns regarding this planned housing development. Westhall is a small, rural village and is not big enough to handle an extra 37 households. There is no school in the village or within walking distance, there is also no employment in the village as we are very rural. The services are not great now and these extra houses would strain an already overworked system, we have poor sewage works, no gas supply and a very poor internet connection.

The village would not handle the extra traffic either, the roads are very narrow and we already have extra commuters cutting through the village to avoid the A12.

I believe we should keep Westhall as it is until we manage to resolve the issues current residents have before adding new ones.

**David Thompson**

This site has been the subject of discussion of future housing development in Westhall for several decades. Whilst there is potential for a small, limited development of between 5-10 properties the idea that 37 new houses could be built there is impractical given the nature of Westhall. Westhall is a small rural community with limited facilities. The roads in the area are all single track and barely suitable for the existing traffic demands. There is no school, there are very limited employment prospects in the locality, the utility services are poor (limited sewage treatment, very old and frequently unreliable overhead power and telephone systems and the broadband service is pathetic) I consider a large scale development at Lock's road to be totally impractical and unsuitable for a small rural community.

I ask Waveney District Council to reject this proposal.

**Nathan Tonkes**

The village is too small for development. The roads are too small for development. The drains are too small for development. We already struggle with the WiFi. There has been no proper warning or information for all locals to find out about this and have their say. It was denied before and nothing has changed except more people use the roads due to multiple cars on existing houses and with other roads cutting through the village. Not to mention the farm vehicles are getting much bigger. The village is a beautiful village as it is and I would personally hate to see it change. I'm all for development just not on the doorstep of existing houses. It would be a real shame to see



the village change just to see someone get rich

I hope there will be a proper meeting held where everyone invited and not done in secret so know one turns up. This should have a proper vote

**Ann Trodd**

This site has been investigated before. There is an insufficient sewage system in this area as it is. These tiny lanes will not take all these extra cars - remember every house will generate TWO cars nowadays. There is a not a bus service suitable for people to work so they will ALL have cars. All this extra traffic meeting the huge farm vehicles? Accidents waiting to happen.

Local primary schools are already full.

Socially it is unacceptable to increase small villages by high volume building. The incoming residents outnumber the existing number of households and this causes social unrest. Increasing houses by one or two at a time, infilling where possible is the way to build a community so that newcomers can be assimilated without causing local resentment.

This is just a local farmer wanting to cash in.

**Historic England (Debbie Mack)**

Proximity to St Georges House grade II and Moatyards Scheduled Monument. Potential impact on setting of listed building and Scheduled Monument.

**Homeowner (John Jackson)**

I am the owner of property at Locks Rd and the plot in question sits directly behind my house. It is, apparently, not owned by a resident of Westhall, but owned by someone in another village. My understanding of the consultation is that it involves a proposal to build up to 37 houses on this lot, with an access point just down from the already existing terraced houses off of Locks Rd.. It is also my understanding that a similar proposal for approximately 44 houses was turned down nearly 10 years ago. The reason for the refusal, which was a wise move, was the lack of adequate infrastructure.

In principle, I am not opposed to building new homes where they are needed and in appropriate locations, making use of brownfield sites as a priority rather than greenfield sites as the first option. However, I do oppose the building of houses on this site, for the following reasons. First, this site is directly behind my house and the lay of the land is such, the water run off and drainage would be a problem. The houses now on Locks Rd. along this field sit below the field and run off and drainage would be a concern. Further, 37 houses in that space would leave little room for green spaces and buffers for the existing properties. Secondly, to pack 37 houses into this area would create an unsustainable and dangerous amount of traffic on Locks Rd., which is little more than a single track road, indeed all of the roads servicing Westhall are little more than single track roads. All roads in this area have many passing places to allow cars to pull over so two can pass. Large farm



machinery regularly travels these roads and an increase in traffic would make this work difficult for farmers. The roads are simply not capable of taking on an increase in traffic. The village is currently not a rat run, but would be and would create a problem for dog walkers and families who walk along these roads. In addition, this area, and especially Locks Rd. is a popular and safe route at the moment for horse riders, hikers and cyclists. Adding 37 houses to this area would create an unsafe environment for these activities. Thirdly, the infrastructure that was present when the council turned down the last proposal has not changed. Westhall has the same sewer system, continues to have no natural gas available (which would necessitate more and more oil trucks in and out of the village), has no school within either walking or cycling distance, The broadband and phone signals are mostly inadequate. In short, the infrastructure not only has not changed, but, given the advances in modern technology, probably has fallen behind. 37 houses would not benefit from this area, in other words.

I am aware that the village council is unanimously opposed to this proposal and so are every other resident that I have spoken to, and that is most. Please do not consider this for development, there are better sites in the area closer to more appropriate facilities.

Thank you.

#### **Housewife (Sally Self)**

I registered to object to the development off locks road for several reasons. Firstly the increase in traffic on narrow country roads particularly lorries if it goes ahead; Pressure on the local schools both primary and secondary; Drainage and sewers not good if problems occur to those directly backing onto the site; Also the landowner in question does not live in the village and hasn't bothered to ask the views of those who will be directly affected. My views from my garden will be ruined.

I sincerely hope any objections are seriously considered as many of my neighbours are also upset by this news too.

#### **Red Bird Publishing (Michael Barnes)**

I can not even fathom how a potential site for 38 houses in a very small village like Westhall would even be considered for development. If this development went ahead it would increase the housing population in the village by just under a third. This is a small rural location which has been farmed for years, turning this into a major housing site would cause no end of problems.

I moved to the village a few years ago as the country lifestyle was what we wanted after living in busy towns previously. The view from my windows is currently out over beautiful farm landscape. Now the possibility of a concrete jungle being at the bottom of my garden is not a great prospect. In fact if this did go ahead we would leave the village, its as simple as that. This would effect the value of my house and many others in the village because it would not be a pleasant place to live. The extra traffic and people would create much more noise than we are all used to, it simply would not be acceptable.

The infrastructure of the small village I live in is just not good enough for these extra dwellings. As I understand it this exact plot was put up for possible development in the previous proposal some 10-15 years ago. It was rejected back then as the infrastructure was not good enough then and now in the years that have passed nothing, yes nothing has changed.

Lets start with the roads. The village only has roads that are big enough for one vehicle to pass. In order to pass others, both vehicles have to mount verges or find one of the very few passing places. We are a farming



community and have lots of large farming vehicles/machinery using the roads on a daily basis. Combines, Tractors, large lorries etc this all with the vehicles of those that already live in the village. The prospect of 38 houses worth of additional vehicles (say 2 per household) would mean a massive increase in cars, vans etc coming and going every day. The increase in vehicles using the roads in the few years we have lived in the village has increased no end. Many ignoring the 30mph speed limit and endangering horse riders and cyclists that use the village roads regularly.

Employment. In this village there are 2 places where you can work. The pub or the village shop, both of which may be closing down in the near future for various reasons. This housing development would increase people commuting in and out of the village looking for work. Something again our roadways would not handle very well at all!!

Schooling. The local schools are already struggling with the amount of children locally. I have a young 16 month old and have been advised by the local schools to apply for her school place now as she may not be accepted. All these extra people coming into the village would no doubt have extra children making it harder for those that already live locally to get their school placements!!!

Mobile phone signal for many different users is non-existent. Broadband speeds are dreadful and very slow as the cables that supply the village are old copper cables. These would need a major upgrade to provide these extra dwellings.

Our Parish Council are against this development as they think it would cause many major issues for the village life of many residents.

I sincerely hope that this development is ignored as Westhall is not a good choice at all for such a major increase in population.

Thank you for your time

**Teacher (Linda Ashford)**

Dear Sir / Madam

I have studied the proposed building development for 44 houses at Locks Road in Westhall and find the scale of the project alarming for our small rural village. There is a very limited infrastructure in the village that currently struggles to serve the existing residents in the village. My understanding is that the sewer facilities are at full capacity so much so that the house that I live in, built over 20 year ago, is not on the mains sewerage system. The internet and broadband facilities are not adequate and the connection is slow and patchy in the village. At present we have small shop and post office but there have been numerous attempts to close it and with the post master aged 90 it is unlikely to be kept open after his retirement.

The local schools are full and some distance away and would certainly require a bus to be provided for the children to get to them. There is a bus service again at present through the village. It has been drastically reduced over the recent years and now only provides a service through the village 4 times a day. The first bus to come through the village is the school bus which has no room for the general public and the next service is at 10am which is not compatible with usual working hours.

Whilst I understand that land for housing is essential and I am not against some building in the village it is the scale of the project that I am objecting to and its significant impact on the village and lack of infrastructure to support such a scale of housing. I think my concerns are shared by many other Westhall residents and I hope councillors will listen and consider the views of the people who live in this village and know it well.

Yours faithfully



Linda Ashford

### **Westhall Parish Council (Louise Studd)**

Westhall PC wrote to WDC about the draft Local Plan on 6th April 2016, having also imparted information about the parish at a meeting in Lowestoft to which we were invited in 2015. The following are relevant extracts from our e-mail:

"Westhall has approximately 140 households spread over a large agricultural area served by single track roads with passing places. The centre of the village is concentrated around Wangford Road, which is also an agricultural thoroughfare and so is in frequent use by large vehicles and machinery. The junction of Nollers Lane, the single track road from the village, with the A143 is narrow with poor visibility and there is little scope for widening and improved sight lines due to existing buildings. Many properties in Westhall lack mains drainage and there is no piped gas. Telephone coverage is unreliable due to our distance from the exchange and the age of the copper cabling, and BT Openreach has said a fibre optic replacement would be uneconomic." "Meaningful development within any part of the parish would therefore require a considerable investment in infrastructure and so it would seem unlikely that the parish would appeal to developers. Further, in a 2008 opinion poll the majority of parishioners stated that they did not wish to see any substantial change in the nature and size of the village. That view has not changed: in the last two months fewer than 10 responses have been received to the Parish Council's request for parishioner input, only one of which supported any form of development."

In light of the above facts, in particular the inadequacy of the road network within and around the village, the Parish Council has serious concerns about the suitability of this site, or indeed any site within the parish, for a 26% increase in the number of dwellings.

### **Westhall Village (David Christian)**

I believe that this would cause problems within the village due to?

Narrow Roads

Sewer system I am not directory on main drains

Schools

No Gas - oil heating - large lorries

Movement of large farm equipment

I appreciate that housing in needed but in our village another 37 houses would cause problems as listed above

Regards David d d Christian



## 124 - London Road, Weston, Weston

### Nicky Elliott

I feel this site should not be developed, as it is to the south of the Southern Relief road which provides a natural limit to a southward creep of development from Beccles.

### Charlotte Sanderson

Development on this site, especially of 243 houses is pushing the boundaries of Beccles further out into the countryside. The occupants of these houses will be largely reliant on using their cars, which will bring many knock on effects, for Beccles (congestion, parking and pollution).

### Beccles Society (Paul Fletcher)

Plot 124 should not be developed for any use under any circumstances as it takes development beyond the Relief Road and hence beyond a natural barrier to urban sprawl.

The corridor adjacent to the Beccles Relief Road should only be developed for housing on a limited scale ie. not all the sites listed should be identified for housing.

### Suffolk County Council (James Cutting)

The county council welcomes the reference to the Beccles South Relief Road and encourages the district authority to mark the route on the Beccles site map. Subject to any further assessments, the proposed level of growth around Beccles is generally acceptable with the exception of the following sites 124, 50, 71, and 77 since these are all further out from the town centre and less likely to encourage sustainable travel choices.

## 125 - Manor Farm Barns, Church Road, Kessingland

### Historic England (Debbie Mack)

Adjacent to Church of St Edmund grade I listed. Potential impact on setting of high grade listed building.

### Kessingland Parish Council

With regards to site 85 (Rider Haggard Lane), site 109 (London Road) and sites 119 and 125 (Church Road) – none of the landowners came forward during the 4 years that the Neighbourhood Plan has been in progress, except the owner of sites 119 and 125 (part of these sites are being used as allotments), who stated that they didn't want to be part of the Neighbourhood Planning process. These two sites which are south of Church



Road are part of the Area of Outstanding Natural Beauty (AONB) bordering the Kessingland Levels, and are not sites suitable for development.

Excluding site 41, which has been included in the Neighbourhood Plan, these 4 sites in total would bring forward 100 homes.

The Neighbourhood Plan, which is as a result of 4 years consultation with landowners and the local community brings forward 3 sites which would bring forward a total of 105 homes plus in the case of site SA1 a commercial incubator facility, in respect of site SA2 a new playing field recreation area extension and in the case of SA3 affordable homes held in perpetuity for the residents of Kessingland.

Therefore the 4 sites put forward in the Waveney Local Plan are considered to be surplus to the requirements of Kessingland, the 'Housing Needs Survey' figures are more than covered by the Neighbourhood Plan proposals, which should be included in the Waveney Local Plan in preference to the other sites put forward.

### 126 - Marsh Lane, Worlingham

**N/A (Robert Devine)**

I have objections due to a number of factors:

1. This site does not comply with Anglian Water's Encroachment Policy concerning the safe distance between a sewage works and any new development.
2. Anglian Water has confirmed to the Worlingham Neighbourhood Planning Group that "there is very limited capacity to accommodate growth" in the Worlingham Sewerage Treatment Works. Also "there is no investment planned to create further capacity."
3. Proposed density of housing is +50% higher than adjacent homes so would not blend in with the environment.
4. There would be an increase of at least +35% more vehicles using Marsh Lane which is very narrow and has a passing place.

### 127 - Mill Farm Field, Somerleyton

**Paul Douch**

Not greatly desirable.

Potential, but only for third to half of site, circa 10-12 houses, to include starter & affordable; to include open space. Drainage problem?

**Gerda Gibbs**

This piece of land consists of two separate fields. To the west there is a strip of agricultural land bordering on to Station Road. This area may be potential for very limited building and will be discussed as part of the proposed Neighbourhood plan. Any future housing in the village must be supported by adequate



infrastructure. The local bus service has been withdrawn and although there is a train station in the village with a two hourly stop, the station can only be accessed via a steep sloping narrow road with no footpath making the walk to the station extremely unsafe and difficult for children, the elderly and disabled. There is minimal employment in the village, the school is at its full capacity and the country roads are very narrow.

The second field on the eastern side of this site is a beautiful meadow filled with wildlife including nesting birds, rabbits, occasional deer and a variety of insects. There is a small pond on this field where two different species of newts have been found. This is a small piece of land supporting a large variety of fauna and flora and should not be used for further development. There is no access to this field from the main road except through a narrow unmade lane.

#### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for the proposed development as this is too large and out of scale with the rest of the village. The community has discussed various alternatives such as using less of the site and/or developing at a lower density but does not wish the site to be included in the new Local Plan. The community has also discussed the proposer's suggestion that the site could accommodate a new community building but has noted that the landowner has not reached any agreement with the owner of the existing village hall.

#### **Historic England (Debbie Mack)**

Adjacent to the Conservation Area, adjacent to Somerleyton Park Historic Parks and Gardens and proximity to Widows Cottage and The Rosery, both grade II listed. Potential impact upon Conservation Area, Historic Park and Garden and setting of Listed Building.

#### **Somerleyton Estate (Lord Somerleyton)**

##### **Site Description and Development Potential**

6.1 Site Option 127 (known as Mill Farm Field) is located in the centre of Somerleyton opposite Mill Farm and the bowling green, south of The Street. A plan of the site is included in Appendix 5.

6.2 Housing would most appropriately be directed to the western portion of the site which is approximately 1.5ha in size. It is generally flat and has a regular shape.

6.3 According to Policy DM16 a density of 30dph would indicate a minimum of 45 dwellings on this part of the site. **A figure of 20 to 25 (including 7 affordable homes) would be more reflective of local character.**

6.4 The site is currently in agricultural use which is Grade 3. To the north is Mill Farm beyond The Street. To the east is Somerleyton Common (a small group of dwellings accessed off The Street) and to the west is residential land (Morton Peto Close, Station Road). To the south beyond a copse of trees is Waveney Grange Farm.

6.5 The site is bounded to the north by The Street and to the west by Station Road.

##### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

6.6 The site sustainability appraisal (SSA) at Point 1 states that "no community facilities propose". We disagree with this assessment. The drawing E374/CFS2 submitted with our call for sites submission clearly shows potential amenity land at the front of the site and a potential beneficial relationship with Site Option 127 where community facilities are a possibility, as discussed in the written part of our call for sites submission. Suggest the effect here should be raised to ++ effect.



6.7 At Point 4 the SSA states “limited community facilities located in the village”. This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised. Suggest the effect should be increased to ++.

6.8 At Point 9 the SSA scores -? And this in part because it is a “significant sized site relative to the size of the village”. However please review drawing E374/CFS2 submitted with our call for sites submission as that shows the potential subdivision of the site and a smaller area than the Council are assuming for the residential element.

### **Somerleyton Estate (Lord Somerleyton)**

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

8.1 We are pleased the Local Planning Authority has assessed these sites in combination as this reflects our submissions to the Call for Sites consultation.

8.2 At Point 9 in the site sustainability appraisal (SSA) the comments are generally positive with only a single negative comment and yet the topic scores - because it is a “significant sized site relative to the size of the village”. However please review drawings E374/CFS2 & 3 submitted with our call for sites submission as they show the potential subdivision of the site and a smaller area than the Council are assuming for the residential element.

8.3 We look forward to discussing these possibilities further as the process moves forwards.

### **128 - Mill Farm, Somerleyton**

#### **Paul Douch**

While the farm is viable, not desirable.

Potential for 8-12 houses, incl starter & affordable; to include open space.

#### **Gerda Gibbs**

This Farm land has been part of the village for many, many years and contributes strongly to the character and uniqueness of Somerleyton village. To walk past on a lovely summers day watching the cows in the meadow and hearing the song thrushes sing in the farmland trees is a lovely experience. It is not suitable for development.

#### **Bruce Hook**

I would like to comment on the proposed land for development at Mill Farm, Somerleyton (Site No. 128). As the tenant of the farm I would like to provide Waveney District Council with detailed information on the current use of the site as well as my observations about the proposal.

##### **1. Current Use of the Site/Buildings**

Drawings prepared by Paul Robinson Partnership appear to show my home (Mill Farmhouse) as a redundant building. This building is not redundant and was extensively refurbished in 2014 and is occupied by myself all



year round.

The farm buildings earmarked for a material change of use are an integral part of my beef production facility and are used throughout the year. There is a clear market with consumers for local, quality beef and my successful business model is based on traditional farming methods out of Mill Farm and can be supported by a number of year's financial accounts, if required.

#### 2. Agricultural Tenancy Agreement

I am the second generation of a three generation full agricultural tenancy.

#### 3. Conservation Area

Somerleyton has been designated as being an area of special architectural or historical interest, which it is desirable to preserve or enhance. Mill Farm is referred to many times within the Somerleyton Conservation Area – Character Appraisal (Waveney District Council Design & Conservation Team (2011) Somerleyton Conservation Area – Character Appraisal). The document states “Included within the conservation area are the historic cores of two working farms, White House Farm, and Mill Farm. Despite the introduction of modern buildings their historic farmyards remain clearly discernible.”

My Grandfather and Father before me have lived at Mill Farm and it is understood that a group of farm buildings appears on this site on the 1844 tithe map<sup>1</sup>. Mill Farm has been an operational farm for many generations and is fundamentally part of the character of the area. The material change of use of fully utilised farm buildings to residential would appear to result in an adverse effect on the character and appearance of the Conservation Area.

#### 4. Adverse Impact on Residential Amenity

I consider myself to be a sensitive farmer and endeavour to reduce any adverse impact on my existing near neighbours and enjoy good relationships with local residents. However, the drawings prepared by Paul Robinson Partnership show the proposed dwellings within a few metres of a full operational farm with a shared access. As a large beef producer (a herd of over 200 head) activities can take place during the daytime and night-time periods. This may include vehicle movements (tractors and HGV deliveries of feed) as well as animal husbandry.

In my opinion, there is no realistic method of satisfactorily mitigating the impact of noise and disturbance at the new dwellings given such close proximity. To put this into context, new large scale livestock buildings would not be permitted in such close proximity to existing dwellings.

I would be grateful if you could please take my comments into consideration when looking at the proposed residential development of Mill Farm.

#### **ann hutchinson**

Mill Farm is in the middle of Somerleyton which adds to the rural character of the village. I have heard tourists comment on this with appreciation.

#### **Julie Reynolds**

There is a farm on this site, would not like to see it leave the village, do not believe it is necessary to develop the only working farm left in such a good location.

#### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for inclusion in the new Local Plan because it is a working farm held on a lifetime



tenancy by the farmer, who reports he does not intend to leave.

### **Historic England (Debbie Mack)**

Located within the Conservation Area and proximity to Widows Cottage, grade II listed. Potential impact upon Conservation Area and setting of Listed Building.

### **Somerleyton Estate (Lord Somerleyton)**

#### **Site Description and Development Potential**

5.1 Site Option 128 (known locally as Mill Farm) is located in the centre of Somerleyton adjacent to the bowling green. A plan of the site is included in Appendix 4.

5.2 It is a regular square shape with existing agricultural buildings and a pond to the front. The site is generally flat and level with a slight rise in the land to the north.

5.3 The site is 1.2ha in size and is well related to the built form of the village. It occupies a central position within the Somerleyton Conservation Area. None of the agricultural buildings are listed.

5.4 It is expected that the existing buildings would remain and form part of any future development. There is approximately 0.7 ha to the rear of the site unencumbered by buildings. According to Policy DM16 a density of 30dph would indicate a minimum of 21 dwellings on this part of the site.

5.5 More appropriately and reflecting the density of surrounding development this part of the site could provide for 15 dwellings (including 5 affordable homes) arranged in a manner sympathetic to the form and position of the farmyard within the village.

5.6 To the north of the site is agricultural land extending some 400m to the B1074 St Olaves Road. To the east is residential land and to the west the bowling green and further residential land. To the south is The Street, Morton Peto Close to the southwest and Mill Farm Field to the southeast.

5.7 In the south of the site is Mill Farm pond again described in the Somerleyton Conservation Area Character Appraisal (SCACA) for its contribution to the character of the area.

5.8 The site has a significant frontage onto The Street and an existing access with good visibility in each direction.

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

5.9 The site sustainability appraisal (SSA) at Point 1 states that “no community facilities propose”. We disagree with this assessment. The drawing E374/CFS1 submitted with our call for sites submission clearly shows potential amenity land at the front of the site and a potential beneficial relationship with Site Option 127 where community facilities are a possibility. Suggest the effect here should be raised to ++ effect.

5.10 At Point 4 the SSA states “limited community facilities located in the village”. This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised. Suggest the effect should be increased to ++.

5.11 At Point 13 the SSA states that there are several listed buildings on site and the resultant score is --. This is incorrect. The buildings on site are local list and not statutorily listed and they are outside of the potential land for housing as shown on drawing E374/CFS1 submitted with our call for sites submission. This score should be improved to ‘0’ (neutral).



5.12 In terms of the current use of the Mill Farm site for agriculture we understand from our clients the land owners that arrangements have been put in place to move the tenant to more modern buildings locally.

## 129 - Old horticultural nursery to the north of Oakleigh, Market Lane, Blundeston

### Mr Atkinson

I wish to object to the development of site 129 on the grounds of limited access via Pickwick Drive. Pickwick Drive is accessed from Market Lane via a very sharp, blind bend. This would not be safe for construction vehicles accessing the site or for future residential traffic accessing the site. In addition Market Lane has suffered from flooding in recent years because the drainage system is unable to cope with the demands placed on it.

### Ian Caile

This development is unwanted by many local residents and with the old prison site ear marked for re-development it's just a case of too much in a small area. The sewage system doesn't seem to be able to cope with the amount of houses that are already here, and the road network around Blundeston is not sufficient to carry the additional vehicles given that most households have 2 cars. Also on a personal note we moved to a village to get away from an over populated town and feel that further development will cause Blundeston to lose its charm and appeal.

### Lisa Doylend

With comment to the option of sites that housing has been proposed for in our village, I seriously think that our small village roads cannot cope with the extra volume of traffic. Sites 42, 27, 129, 29 should definitely be ruled out.

### Lisa Doylend

Sites 27, 129, 49, same main reason of extra traffic as sites mentioned above. Sites 20 and 63 are better situated with access from Flixton Road, which would keep extra vehicles away from village, but still too many houses proposed for sites, these could potentially create an extra 600 vehicles on small roads.

### Terry Gooding

Blundeston cannot support a development of this size, there simply isn't the infrastructure to justify it. Destruction of greenfield sites, over subscription of essential services such as schools and doctors, the fact that roads will become busier and more dangerous as a result. Increased risks of flooding due to concrete coverage.

As a wider concern I do not see plans for new hospitals, fire stations, police stations, doctors, school or public transport

Why is the redevelopment of the prison site not included here which in itself will contain at least 100 houses - will this offset your need to build all over Blundeston & ruin yet another beautiful village. People live here to escape the sprawl not live on a housing estate.



I appreciate that housing is required but not on this scale and any planning application of this nature will be opposed by all who live there.

**Laura Gooding**

The Pippins is a road which will be backed onto by site 129 where they want 45 houses. Our garden gets flooded in the winter as the drainage is so bad due to old sewage systems which simply can not Handle all the drainage currently. If more houses are built on the back field this will cause damage to our gardens.

**andy Howlett**

Suggest that this is planted as a woodland area to make wildlife habitation.

The village of Blundeston will become Carlton Colville if further development is permitted.

Just take a drive down The Street in Blundeston along the obstacle course and mish mash of parked cars and current overdevelopment.

On the plan so far no account is taken of any future development of the former prison site and the impact this could have.

Blundeston is a village – keep it that way.

This is simply greed and over development.

We strongly object.

**Anthony Light**

Site 129 has previously been refused planning permission.

**John Mitchell**

Site 129 for 45 houses could use the existing road access on the corner of Market Lane. But, it seems a shame to extend housing into the open countryside around the village, when a suitable brownfield site already exists in the village.

**Bruce Rayner**

Site 129

Plan indicates that housing demand may exceed supply and that there may be a requirement for a further 8,000 homes before 2036. Before large areas of the locality are built upon, are the Council certain of the requirement? It would seem irresponsible to build numerous 'white elephants'. Is this not merely a function of the Government's policy to build a specified number of homes but without certainty of need in this area?

The plan indicates that there are already 3,141 new homes in the pipeline plus a further 633 anticipated. That



would seem to be enough for the present until precise requirements are known.

Comments are:

- a) Most employment is South of the river. Blundeston is to the North.
- b) Transport in Blundeston is poor, there is bad road access and it is dangerous even with low traffic. Sites 164-165 are better served.
- c) Site does not benefit from obvious safe and easy access.
- d) Why spoil such a beautiful area, enjoyed by tourists, local runners and cyclists? Further traffic would be a hazard.
- e) As a Chartered Surveyor, your numbers per hectare do not appear to be accurate.
- f) There are no amenities in Blundeston, not even a village shop for milk, bread, etc.
- g) There is no regular bus service. Increased traffic to get in and out of the village is an environmental issue. Areas identified South of Lowestoft are already served by public transport and allocated safe cycle routes.
- h) Properties in Blundeston are mature. New homes next to what are already new homes in Carlton Colville would be much better.
- i) By publishing this document, you seem to have added planning blight to nearly all of the homes surrounding Lowestoft for no apparent reason.
- j) Building 456 new homes in Blundeston would almost double the population of the village, surely not desirable, sensible or necessary.
- k) Current essential services /supply are limited. At certain times of the day, water pressure is already very low.
- l) Risk of flooding through rainfall if a concrete jungle is built - sewers can't cope.
- m) Broadband is slow and mobile phone signal is bad.
- n) Development on the prison site is already ample for the village to cope with.
- o) Blundeston is inhabited by lots of wildlife. There are owls, newts, hedgehogs, etc. I've heard baby owls calling to their parents from our house. Some of these species are becoming rare. Why destroy these areas when there are alternatives?

It makes far more sense to build on the sites identified in Carlton Colville. The proper infrastructure could be put in place in one designated area. Why spoil beautiful landscapes, upset huge numbers of the local population and potentially decrease tourism and enjoyment of the areas outlined.

### **Rosalind Roots**

Sites 129 and 27 are close to fields and hedges where wildlife would be threatened. We are presently blessed with an abundance of wildlife, that I have recently been able to photograph, like hares, rare butterflies, deer, and varieties of birds including species on the decline like skylarks and cuckoo. It is a peaceful area enjoyed by the villagers and it is hoped that these sites will not be chosen.



**Gary Shilling**

As outlined in my local village news letter (Blundeston) I would like to register my rejection to any large scale building (sites 29, 42, 63 & 129), in my opinion the village neither has or has the ability to enable a construction on these scales. We have neither the roads to handle the increased traffic ( roads not in a good state of repair or wide enough, concerns for children around the village as no road has a cycle lane or footpath), the school could not accommodate an increase, no local facilities and simply no need. It is nice to remain a village and not end up becoming part of oil ton broad as outlined village has done! I have no objection to small (under 10) development that allow the village to absorb the impact that it would have. I understand this is a biased view, but like everybody whom lives here, we picked it because it is a small village. This is mind with the development on the old prison site and other sites (that have been constructed and are just footings in the ground) the usual infill sites have been enough. The development on the prison will increase the traffic in and out of the village hugely as most households have two cars if not more, and that with children staying at home for longer traffic will increase without further building. T can already be seen throughout Lowestoft, Blundeston aside people are increasing parking on the road instead of using garages of changing front gardens to off road parking which should be implemented to remove cars parked on roads to increase road safety. Sorry didn't mean to turn into a rant.

**Gary Shilling**

Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians),

**N/A (Tim caley)**

This is green belt land.

Blundeston has a huge pending development site at the prison site.

There is no infrastructure in the village to support the present expansion let alone more building. Blundeston has no shops, doctors surgery or dentist and has a school which is already oversubscribed.

All local roads are small and dangerous with numerous blind bends and hidden entrances and exits. Further increases in traffic will increase deaths and or serious injuries. Roads are in an appalling state of repair and are constantly clogged with school traffic.

**Suffolk County Council (James Cutting)**

The large sites around Blundeston (63, 42, 129) are not currently desirable as there are limited amenities and services within reasonable distance to promote sustainable travel patterns and some of the road network might not be of sufficient standard or capacity. If this scale of development, including growth beyond the village and the proposed redevelopment of the prison, is to be brought forward, a comprehensive review of transport issues will need to be undertaken which may include opportunities for further enhancement of transport infrastructure and services.

**Suffolk Wildlife Trust (James Meyer)**

Based on aerial photographs, sites 54; 84; and 129 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated



that this would not result in an adverse impact on any existing ecological value that they have.

### **130 - Old Rectory Poultry Unit, Benacre Road, Henstead With Hulver Street**

#### **Mrs Moore**

We feel the potential building of 57 homes (a mini Housing Estate) on this rural field would be a massive over-development. Henstead with Hulver Street is a small countryside village with no facilities.

There are no public buses through the village so all journeys would have to be taken by car to Beccles, Lowestoft or Norwich for shopping, leisure, medical services etc. 57 homes could easily involve a hundred vehicles and access onto the busy B1127 would cause a lot of problems.

There are no doctors, schools, pubs in the area, not even a village shop. There is nothing (not even a safe play area) for young children, no pub or entertainment or centre for elderly people.

The visual appearance of a housing estate would ruin the quiet countryside area and be totally out of keeping with the surroundings.

We therefore strongly oppose this as a suitable site for multiple housing.

#### **Julie Reynolds**

Good area to develop, well centred in the village with good access and pleasant views. Would link well with existing housing.

#### **Henstead with Hulver Street Parish Council (John Armstrong)**

The Parish Council considered the questions you asked it to provide information about. They agreed that the proposed sites for possible development were unsuitable in terms of the number of houses projected for the sites. As I explained in my previous response the Councillors did not feel that they could respond to the other questions about jobs and facilities until after the consultations with residents in the development of the neighbourhood plan.

#### **Historic England (Debbie Mack)**

Old Rectory grade II 150 metres to east. Potential impact on setting of Listed Building.

### **131 - Orchard Farm Rear Field, New Road, Mutford**



**Robert Gill**

This site (together with site 132) is the middle of open farmland, and is situated up a very narrow lane, with a dangerous junction onto a fast moving and busy road. Building here is not necessary in order to meet the housing demand. We oppose the inclusion of the site.

**Charlotte Sanderson**

I feel that this development would be inappropriate for a number of reasons:

- ▶ This is currently a Greenfield site.
- ▶ It is outside the village envelope.
- ▶ The development of 42 homes would change the very rural nature of this end of the village, and would lead to the suburbanisation of the area.
- ▶ I feel that this development would set an unacceptable precedent.
- ▶ 42 homes would place pressure on the struggling existing sewage infrastructure.
- ▶ Neither Mutford nor Barnby / North Cove has no village shop, few places of employment, and no surgery. The village school at Barnby is full.
- ▶ The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 84 cars regularly joining the A146 (and add a likely 212 extra vehicle movements a day). There would be greater likelihood of collisions, and increased levels of air pollution.
- ▶ The New Road and surrounding lanes are used for recreational purposes and are popular with cyclists, horse riders and walkers.
- ▶ The “soundscape” of this part of the village is likely to change in character. Other than the noise of the A146, it is quite quiet. You can hear farm animals and wildlife. This is an important feature of the villages “breathing space”. It is likely that a suburban housing development would add lawnmowers, radios and voices, and so change peoples experience on the nearby public footpath.
- ▶ The rural character of the night sky would change, with the addition of security lights and potentially street lights.

**Historic England (Debbie Mack)**

Proximity to grade II Ash Farmhouse to the east. Potential impact on setting of Listed Building.

**Mutford Parish Council (John Armstrong)**

At their last meeting the Council also agreed that the proposed sites were totally unsuitable for development. Site 131 is a greenfield site, site 88 is also a greenfield site and would extend the curtilage of the Village and also impact on two grade 2 listed buildings. Council is also undertaking a neighbourhood plan and wish to wait until the outcome of the consultation process is known before responding to the other questions.

**132 - Orchard Farm, New Road, Barnby**

**Robert Gill**

This site, together with site 131, is situated in the middle of open farmland and along a very narrow lane. The access from the lane is onto a fast moving and busy main road. This site is not required in order to meet



housing need and will detract from the rural environment. We oppose the inclusion of the site.

**Charlotte Sanderson**

I feel that this development would be inappropriate for a number of reasons:

- ▶ This is currently a Greenfield site.
- ▶ It is outside the village envelope.
- ▶ The development of 40 homes would change the very rural nature of this end of the village, and would lead to the suburbanisation of the area.
- ▶ I feel that this development would set an unacceptable precedent.
- ▶ 40 homes would place pressure on the struggling existing sewage infrastructure.
- ▶ Barnby has no village shop, few places of employment, and no surgery. The school is full.
- ▶ The occupants of the new development would be reliant on their car, which is not sustainable. It is my view that this development is likely to add a further 80 cars regularly joining the A146 (and add a likely 200 extra vehicle movements a day). There would be greater likelihood of collisions, and increased levels of air pollution.
- ▶ The "soundscape" of this part of the village is likely to change in character. Other than the noise of the A146, it is quite quiet. You can hear farm animals and wildlife. This is an important feature of the villages "breathing space". It is likely that a suburban housing development would add lawnmowers, radios and voices, and so change peoples experience on the nearby public footpath.
- ▶ The rural character of the night sky would change, with the addition of security lights and potentially street lights.

**Barnby Parish Council (Ian Hinton)**

So called "Orchard Farm" (including 131 in Mutford) although away from the village, it has been the subject of many applications for residential, aborted farming functions, then holiday lets. It now has a new feed shed being built that would be sufficient for a 100-acre farm rather than a 10-acre field – currently allegedly farmland.

**Historic England (Debbie Mack)**

Proximity to grade II Ash Farmhouse to the east. Potential impact on setting of Listed Building.

**133 - Owls Cottage, Marsh Lane, Worlingham**

**N/A (Robert Devine)**

I have objections due to a number of factors:

1. The proposed site does not comply with Anglian Water's Encroachment Policy concerning the safe distance between a sewage works and any new development.
2. Anglian Water has confirmed to the Worlingham Neighbourhood Planning Group that "there is very limited capacity to accommodate growth" in the Worlingham Sewerage Treatment Works. Also "there is no investment planned to create further capacity."
3. The proposed density of housing is +50% higher than adjacent homes so would not blend in with the



environment.

4. There would be an increase of at least +45% more vehicles using Marsh Lane which is narrow and has a passing place.

### 134 - Playing Field, off A145 London Road, Shadingfield

#### John Lavery

This also applies to plots 68,59,64,94. Any and all of these possible developments are going to change the Village dramatically. Shadingfield is a very pleasant Village to live in provided you have a car and are in good health. Without big changes to infrastructure these developments wouldn't be viable. With the necessary changes Shadingfield becomes a suburb of Beccles and loses its character forever. I am therefore firmly against these suggestions.

#### Broads Authority (Natalie Beal)

Group of sites to the south of Beccles – As they are on rising ground, any development proposals would need to be assessed for potential landscape and visual impacts on the Broads area.

#### Historic England (Debbie Mack)

Close to Fox Farmhouse, grade II listed building to north. Potential impact on setting of listed building.

#### Sotterley Estate (-)

#### Site Description and Development Potential

4.1 Site Option 134 is the Playing Field and is located in the centre of Willingham. A plan of the site is included in Appendix 4.

4.2 It is accepted that replacement provision of the existing facilities would need to occur to allow for development of this site i.e. the playing field and play equipment would need to be replaced/relocated. The Sotterley Estate own adjoining land so this is not a constraint to delivery. Indeed, improvements such as dedicated parking and improved facilities including road safety features on the main road could be considered.

4.3 The site is 1.2ha in size and is well related to the built form of the village . It is a regular square shape with a pair of goal posts and some play equipment in one corner. According to Policy DM16 a density of 30dph would indicate a minimum of 36 dwellings on this part of the site.

**4.4 More appropriately and reflecting the density of surrounding development this site could provide for around 20 dwellings (including 6 affordable homes) arranged in a manner sympathetic to the site and its location.** This could also include a route through to a new playing field site (as identified on the map in Appendix 4) with parking provision which does not currently exist.

4.5 The site is bounded on all sides by residential development and adjoins an agricultural field to the northeast which could provide for the replacement playing field. The site has a significant frontage onto London Rd which is in a 30mph zone and an existing access with good visibility in each direction.



## Response to Issues and Options Consultation and Site Sustainability Appraisal

4.6 The Site Sustainability Assessment (SSA) for this site at Point 1 states that there would be a significant loss of an open space and football pitch. This is not what is proposed; the Estate do not expect to be able to develop the site in whole or in part without replacing that provision.

4.7 The assessment for Site Option 134 in combination with Site Option 68 is the correct assessment based on the submissions we made to the Call for Sites consultation.

4.8 The combined assessment for Options 134 and 68 notes the potential loss of a village focal point. We agree that the retention of some open space on the frontage with London Road, combined with improved pedestrian facilities would mitigate this loss.

### 135 - Playing Field, Somerleyton

#### Paul Douch

Undesirable: this land should be protected as "Local Green Space"

#### Gerda Gibbs

The playing field is a well used green area for all sort of recreational purposes. It is the home grounds for Blundeston and Somerleyton Cricket club participating in County matches. In addition the club has a children/young people cricket group attached. The tennis courts are used twice weekly by the local tennis club and by individual tennis players. The play equipment on the enclosed play area is used by many small children especially while the grow-ups are playing sports. Families fly kites and play ball games on the field, people enjoy walking across the grass and the surrounding hedges are filled with a variety of wildlife. Temporary accommodation has been placed on the field - the clubs and the village are hoping that these will be replaced by a sport/village hall when funding becomes available. This invaluable recreational land is NOT suitable for housing development.

#### Joy Jones

Building on this site would greatly increase the volume of traffic through the village. The playing field is a valuable resource for villagers to use. I can't think of any alternative and accessible area, within easy reach for villagers, that could resite the playing field and have space for cricket pitch, a play area, tennis court etc. Therefore it is very important that the playing field remains where it is now.

#### chris Morris

Site 2 on the plan area the village allotments (much prized and fully utilised) and site 135 is the playing field, again, a very valued community asset. Neither should be considered for development.

#### Julie Reynolds

**Strongly disagree** with any housing development on this site which is presently a well used playing field. Part of this site is owned by Somerleyton Community Association in trust for the people of the village to use for recreational and community purposes, it cannot be taken away from us. Our playing field is precious and



there are many other sites which are more suitable.

### **Ashby, Herringfleet and Somerleyton Parish Council (S Phillips)**

This site is not suitable for housing development as this would breach national planning guidance, it would result in the loss of a vibrant playing field which is used for league cricket and is one of very few publicly accessible large grass areas in the parishes and that the indicative number of houses would create traffic problems in Station Road. The site indicated is mainly held on a long lease by Somerleyton Community Association, which also owns a small part of the site. The proposer has not reached any agreement with Somerleyton Community Association for any use of this site except as a playing field.

### **Historic England (Debbie Mack)**

Adjacent to Conservation Area and proximity to White House, Pond Cottages and Widows Cottage, all grade II listed to north. Potential impact on setting of listed buildings and conservation area.

### **Somerleyton Estate (Lord Somerleyton)**

#### **Site Description and Development Potential**

7.1 Site Option 135 (playing field) is located in the south of the village off Station Road. A plan of the site is included in Appendix 6. The Site edged red on the enclosed plan is approximately 3.2ha in size and incorporates space for a cricket pitch and football pitch, a children's play area and a multiuse games area (MUGA). It is clearly understood that any loss of sport and play space provision would need to be compensated for and that the precise details of this would be a matter of detail for a later stage in this process and/or a planning application.

7.2 The suggested development area could be less at approximately 1.6ha and this would be dependent on the degree of retention of existing playing field and play space facilities which may be surplus to requirements or replaced locally. The Estate are currently investigating whether there is majority support in the community for a proposal like this hence the nature of this particular site submission proposing to link to the adjacent site to provide offset facilities. According to Policy DM16 a density of 30dph would indicate a minimum of 48 dwellings on this part of the site. **We consider a figure of 20 to 25 (including 7 affordable homes) would be more reflective of local character.**

7.3 To the north of the site is residential land associated with the properties fronting Station Road, Morton Peto Close and properties fronting The Street. To the southeast is Waveney Grange Farm, and to the east and south is agricultural land beyond Station Road. To the west is woodland.

#### **Response to Issues and Options Consultation and Site Sustainability Appraisal**

7.4 The site sustainability appraisal (SSA) at Point 1 refers to "limited community facilities in the village". This is incorrect. The Waveney village profile or Somerleyton confirms that there is a full suite of key facilities and this needs to be recognised.

### **136 - Rear of 11, 15, 17, 19 & 21 Birds Lane, Lowestoft**

Mrs Jones



Re: Development of small plot on land at rear of Birds Lane in Lowestoft.

I have recently taken the time to read a lot about the future growth for waveney.

I have lived in Lowestoft all my life I have formed an opinion on where housing should be developed based on my lifetime of living here.

I feel that yes we will need large areas of growth on the outskirts of town. People naturally will want to move to the suburbs when they start a family or grow their family. However, and this is reference to this and one other site i can see on the map for potential land for development [137].

I think that we do have lots of land or indeed disused buildings in the central areas of towns, places near schools and shops - where i feel should be immediate and top priority for development.

Why do i think this? Well if we continue to just expand the housing on the outskirts of town then we are just causing a traffic problem. If you are on the outskirts of town you are going to need cars to be getting in and around town. If we develop in town then this will reduce the traffic problems and indeed encourage healthy transport such as walking and cycling.

People want to live near schools, shops, parks, the beach etc so to keep mindlessly expanding on more green space, lets have a look around and develop the many small scale areas where homes are going to be close and convenient to amenities which people need.

I know NIMBY's will say we dont want development near my house, and this will occur if developing in urban areas, however we can't leave prime space or horrible looking disused buildings where families could be living just because people don't want houses built there.

I see the flood deference is being consulted on and i'm sure once this is built it will free up a lot of land which currently maybe in a supposed once every few hundred year flood zone. Again i hope this opens up more urban area for development so that we can stop the sprawl and start to live in town and reduce the need to use a car and block up the roads.

So in my opinion smaller sites like 136, which are actually in the town of Lowestoft should be developed as a priority.

### **137 - Rear of Nos 485 & 487 London Road South, Lowestoft**

**Mrs Jones**

Having read a lot about the future growth for waveney and having lived in Lowestoft all my life I have formed an opinion on where housing should be developed.

I feel that yes we will need large areas of growth on the outskirts of town. People naturally will want to move to the suburbs when they start a family or grow their family. However, and this is reference to this and one other site i can see on the map for potential land for development. I feel that we do have lots of land or indeed disused buildings in the central areas of towns, places near schools and shops - where i feel should be immediate and top priority for development.

Why? Well if we continue to just expand the housing on the outskirts of town then we are just causing a traffic problem. If you are on the outskirts of town you are going to need cars to be getting in and around town. If we develop in town then this will reduce the traffic problems and indeed encourage healthy transport such as walking and cycling.



People want to live near schools, shops, parks, the beach etc so to keep mindlessly expanding on more green space, lets have a look around and develop the many small scale areas where homes are going to be close and convenient to amenities which people need.

I know NIMBY's will say we dont want development near my house, and this will occur if developing in urban areas, however we can't leave prime space or horrible looking disused buildings where families could be living just because people don't want houses built there.

I see the flood deference is being consulted on and i'm sure once this is built it will free up a lot of land which currently maybe in a supposed once every few hundred year flood zone. Again i hope this opens up more urban area for development so that we can stop the sprawl and start to live in town and reduce the need to use a car and block up the roads.

Get building 'in' Lowestoft. That's my opinion Anyway.

#### **Adam Skinner**

I feel this should be left in its current use

#### **Historic England (Debbie Mack)**

Adjacent to Conservation Area. Two Chapels and Lychgate at Kirkley Cemetery, all grade II listed. Potential impact on setting of Listed buildings and Conservation Area.

### **138 - Saint Felix School (land between St Georges Square and Lakeside Park Drive), Halesworth Road, Reydon**

#### **John and Barbara Carter**

Wherever possible it is important that new homes are built on brown field sites and that village boundaries are not extended.

We strongly believe that allowing the St Felix playing field site to be developed would be detrimental to this AONB and it would set a precedent for the approval of future applications for other parts of St Felix and adjacent areas.

At peak periods (especially in summer time) the A1095 (Halesworth Road) is heavily trafficked and often access from connecting roads is delayed. Any future development of this area would seriously impact on this traffic problem.

#### **Simon Clack**

As regards the sites to the west and south of Keens Lane (site numbers 138, 116, and 117), I believe that they should all be excluded from any further consideration. The reasons for not developing the Saint Felix playing fields have already been well rehearsed (cf the comments made by local residents and organisations such as Sport England regarding planning reference: DC/15/3288/OUT) and many of the same arguments also apply to site numbers 116 and 117, specifically: a/ the land enjoys AONB status and there seems to be no reason why



the Planning Inspectorates' recent decision regarding the proposed Reydon Smere development (cf APP/T3535/W/15/3131802) should not also apply to this area; b/ any vehicular access points from the A1095 would have to be located next to a blind corner or in a blind dip and would increase traffic on an already dangerous stretch of road. Any measures to remedy this situation (i.e. a roundabout) would only serve to further harm the character and appearance of the main gateway to Southwold & Reydon from the south; c/ developing these sites will encourage the landowner to fill-in the area between the solar farm and the Adnams distribution centre; and e/ the sites abut a pair of Grade II listed properties at the end of Keens Lane.

### **Margaret Dinn**

I strongly oppose the development of the fields to the west of Keens Lane and the Saint Felix playing fields (sites 117, 118, and 138) as: i/ access to these sites from the Halesworth Road (A1095) would be next to a blind corner or in a blind dip and would increase traffic on a dangerous stretch of road; ii/ developing these areas of AONB land would have a massive impact on a landscape that forms a gateway to Southwold and Reydon; and iii/ developing sites 118 and 117 would create an urban sprawl and no doubt encourage the landowner to seek permission to fill-in the remaining land framed by the Adnams distribution centre and the solar farm

### **Jim Elmes**

Access onto Halesworth Road may be difficult. With the fall of this land to the south, how will drainage be dealt with?

### **G Golding**

Site 138 has had objections from all these professional bodies

Sport England

Natural England

Suffolk Coast and Heaths

Suffolk Wildlife Trust

Suffolk Preservation Society

Suffolk Archaeology

Suffolk Highways Department

circa 100 local objections have been logged on the Waveney planning website, this site borders a Natura2000 site, which is protected under EU law, this is simply not the place to develop. Reydon and Southwold has already sufficient land stock to meet the needs of local demand. Development along the approach to Southwold is of significant importance to attracting visitors into the area, so to is safe guarding our AONB and wildlife environment.

Any additional access point onto the Halesworth Road for a significant number of vehicles will cause many problems on what is an already busy and dangerous road,

The gateway into Southwold is a recognised attribute to Southwold and this extends along the entire road



leading into Southwold from Reydon and the A12. In 2006, a previous planning application was turned down by the Planning Inspectorate who ruled that development on this site would damage the natural line of trees

Mr A S Newman for and on behalf of the Secretary of State, wrote

“This double line of Holm Oaks ..is a feature of high amenity value on the main road approach to Reydon and Southwold.”

“In my opinion the construction of this access would have a harmful visual impact on the group value of TPO trees and their contribution to the approach to Reydon.”

### **G D Humphries**

As I have lived in Reydon for a great number of years I have seen the village grow in size, and if not careful the village atmosphere would change. As for the proposed site near Keens Lane a most dangerous road to come out onto the Halesworth Road at any time of year. It would mean more cars on the already stretched roads. Also like all developments second homes for people outside of the area. Too many houses mean over development, and ruin the atmosphere of such a lovely area. One can see what happened to our neighbours in Southwold as a victim of its own success. Nearly all second houses priced out of young people's reach. Parking in the summer time is hopeless. Shops trying to find people to work in them. Even the prices of Reydon property is going up and up as people struggle to afford Southwold prices, and even Reydon now has many holiday homes. It must retain the countryside aspect, without becoming a concrete jungle. As for building on St. Felix School playing fields that should be removed completely from consideration. It would spoil the whole outlook. Enough houses were built when St. George's Square was built. Enough is enough otherwise there is no end to development in the area.

As there is very little work apart from seasonal and retail it means more second homes which is ridiculous. More homes more traffic it is bad enough now. It would be a great shame to see the playing field built on, and lose more of the countryside that makes Reydon a village atmosphere. There is no industry here and prices are so high most of the young people move away, and you need a mixture of both young and old.

Do we need anymore development the answer is no. If we keep building at this rate all the villages will be joined up. Also with trees and countryside we have the pleasure of wildlife. Owls, bats and birds, and more.

### **Kevin Kinsella**

As for the St Felix playing fields, our objection to that plan has already been lodged with your good selves and a copy can be found in this thread at the bottom of this section. We would ask you to take note of those objections in this consultation too.

Planning Reference: DC/15/3288/OUT – Outline Application for Residential Development on St Felix School Playing Field, Halesworth Road, Reydon.

Please be advised that we strongly object to this application for the following reasons:

1. The site is in an AONB and is therefore protected from development...
2. The site is outside the approved village physical limits of Reydon and this should not be breached...
3. Other brownfield sites are available in Southwold...



4. The site is immediately adjacent to a sensitive County Wildlife Site and bats and other protected and/or valued wildlife thrives in the area...
5. The site is designated Open Space, so any development is wholly inappropriate. Light pollution and other undesirable impacts upon the environment will result...
6. I note Sport England's unequivocal and strong objection to the application and wholeheartedly support their position. We would though, further emphasise that community sports clubs, such as Southwold Rugby Club, make extensive use of the existing playing fields...
7. These new houses will almost certainly turn out to be mainly second homes. All recent new housing developments in both Reydon and Southwold have a 'second home' occupancy of at least 50% and many become empty properties for a large amount of the time...
8. These are very unlikely to be 'starter' homes. It is not clear to us where the jobs or employment prospects for those, expensive, homes are, or will be...
9. As to affordable homes, there are currently 54 affordable houses either being built, or planned, in the local area. We are not aware of any discernible evidence that there is a need for another 24...
10. Central to Saint Felix Schools application, appears to be a financial case whose supporting documentation is not being made available to the public. It therefore cannot be taken into account when determining this application. Similarly, as Sport England noted, no matter what the school intends to do with the funds, none of that comprises any part of this application and as such, none of it can be taken into account when assessing the merits of the application...
11. The proposed access road onto Halesworth Road is at a dangerous point. We note that the previous application permission for egress onto the Halesworth Road was denied...
12. There is a threat to the Holm Oaks especially from the new roadway...

We therefore strongly object to this planning proposal and ask that it be refused.

**Julian Lawrence**

I think that scenario 1 option 1 would be more than enough for this area

Reydon and southwold have plenty of brown field sites and in fill sites earmarked already. For housing .This area is an area of ONB and encroaching on more green land is ludicrous. The services and utilities cannot cope as it is. Water /sewage is overstretched. the doctors dentist and school etc. has waiting lists and long waits for appointments already. Children are already being bussed out on mass as no secondary school. Traffic into Swold and area is nonstop already on the Halesworth road and people in Keens lane and area already find it a problem to access the road. This would add to mass overdevelopment for a village that is at the edge of nowhere with hardly any employment .where would all of the people work ,They would have to commute adding to more pollution ,road chaos and congestion .There are already enough second /holiday homes also in area so we do not need more of them either. Pease be realistic about the future plans at least and choosing sites a community that just copes with its services and utilities and employment would be overwhelmed and change it completely.

**russell martin**



The area numbered 138 is, I understand, in an AONB, and I cannot believe it would be sensible to set precedents by allowing building on land designated as such. I have made more detailed comments below.

Area 138 should be removed entirely – this is in an area of AONB and development would require removal of protected trees. The size of and location of other areas is better. Also the suggestion that this site is included seems to be nothing other than a fall-back position by the applicants of a current planning application, which has every possibility of being rejected.

#### **Kimberley Martin**

Any sites allowed for building should be small sites and the St Felix site should be removed from consideration. The St Felix site is in an area of AONB and in the absence of needs that cannot be met from other sites should not be considered. Also it is a playing field in current use and according to government legislation could only be considered if other conditions were met. It is the subject of a current application and Sport England has strongly and correctly objected.

#### **Mr & Mrs McNally**

We attended the meeting on Tuesday 10 May to view the Waveney Local Plan. We were surprised to see so many homes planned for Reydon. Is there really a need for this amount of extra housing in this area?

We asked the Planning Officer if the necessary infrastructure would be put in place prior to or at the same time the homes would be built. We were shocked to be told that this would not be the case and their remit was just to built houses and there was no link up with any necessary services. We pointed out that there are currently long waiting times for appointments at the Health Centre and treatment times at the James Paget A&E are below targets. The Planning Officer said that shortage of doctors is a nationwide problem and any improvements needed cannot be part of the housing development plan. There also appears to be no firm plans proposed for more school places, jobs, shops, sewage capacity etc. for the 972 homes mentioned.

It would appear that the area will be overdeveloped to provide housing with no thought for the well being of existing or new residents. Surely this cannot be right and we are writing to ask what action you will be taking.

There is also the concern that a lot of the new property will be second homes and holiday lets and wonder if you will be-considering adopting the St Ives ruling of not allowing this type of person to purchase new properties. This would make it less attractive to developers to build such large housing developments.

One last point when does a village enlarge so much to qualify to become a town?

#### **Pamela Morris**

Please delete areas in 117, 118, 138

All these are large areas and all off the very busy rural A1095. Any development in any one of these areas would be in excess of the % new dwellings sought and would change a village to a town. This is an area where affordable homes are not required; developers would building houses as holiday or second homes for excess profit. Very many other reasons could be given.

#### **des o'callaghan**

I do not think the St Felix Reydon site is suitable. It is an AONB, part of and adjacent to fauna and flora reserves of great importance. Moreover I do not think the current infrastructure supports the existing developments



e.g water and sewage.

As asides, the school plan seems not to have been thought out properly with a reason for wanting monies to defray operating costs. This is only postponing the demise of the school if true. Also, the number of houses applied for (70) is ridiculous given the plot size.

#### **Mr Parke**

Completely unsuitable, for all the reasons given in the objections to this, as described in and submitted to planning application DC/15/3288/OUT. Urbanisation in an AONB.

#### **Ruth & John Pigneguy**

Many residents have moved here to live in a semi-natural area. These sites look like massive over-development. Second homes need to be controlled so that we can have local full time residents living here.

#### **John Reaney**

I wish to strongly object to any proposal to build on the St. Felix School Playing Fields by St. Georges Square (referred to as Site 138 on the Waveney Map). My objections cover firstly the entire proposal and secondly, to the development of land west of St. George's Lane, directly behind St. George's Square.

#### **Objections to the Entire Application:**

The land on which the application DC/15/3288/OUT proposes to build 71 houses is of unique character and gives to the environs of Reydon and Southwold a quality that makes the area so attractive to all those who visit this part of Suffolk. This land, although used as school playing fields, forms a natural division between the buildings of St. Felix School and the row of houses along the Halesworth Rd. that continue all the way into Southwold. This natural break between these two entities is enhanced by the beauty of the unbroken line of trees that separate the land from the Halesworth Road. The application, if it succeeded, would result in this natural green space disappearing and result in a mishmash of building/housing developments stretching from St. Felix School to Southwold, which would present to any visitor to the town a dreary and depressing backdrop as they came along the Halesworth Rd.

The location of the access road shown on the development plans is at the worst position possible. It is very close to three other road entrances near to Keens Lane, which are all near to a bend and a dip in the road. The proposed location of the entrance would make this stretch of the Halesworth Rd. very dangerous. Drivers coming out of this entrance would have great difficulty getting on to the Halesworth Rd. at peak times and drivers exiting from other entrances would be exposed to greater hazards than they experience already.

The land should remain as playing fields, either for the school or for use by the local community. Presently the playing fields are heavily used by the Southwold Rugby Club for practices. Other uses could be made by local football and cricket clubs.

Before the plan is even considered by the planning inspectors, it is vital that the viability of St. Felix School in the long term is considered. St. Felix School used to own a considerable amount of land in the Reydon/Southwold district that has gradually been sold off over the years in order to finance the school.

#### **Objections to development of land west of St. George's Lane, directly behind St. George's Square:**

The land to the west of St. George's lane is part of the wooded area that forms the eastern escarpment of the sunken track (Shepherds' Lane) which runs down from the Halesworth Rd. to the Marsh Cottages. This area is



of unique beauty and character and is situated mostly in the Area of Outstanding Natural Beauty as defined on the maps. Unfortunately, there is a small level patch of land between this area and St. George's Square on the west side of St. George's Lane on which the plans submitted with the application DC/15/3288/OUT show the placement of two houses.

Building two houses in this location would represent a serious intrusion into a beautiful area of wooded country. Furthermore, their close proximity to the residences of St. George's Square would affect the aspect that many of the residents enjoy looking to the south and south-west as well as reducing some of their natural light.

The original plans prepared by St. Felix School's agent, Bidwells, did not show these two houses on the west of St. George's Lane. In order to preserve this unique area to the west of St. George's Lane, it is vital that approval to build these two houses is not given.

#### **David Salter**

I am a resident of St Georges Square but I don't look over the proposed development (so not a NIMBY)

I appose this development on the following grounds:

- ▶ The infill on green and field sites (in this case AONB) will destroy the look and feel of Reydon
- ▶ The development will drag in more holiday/second home owners
- ▶ Reydon will become so big that we will need to develop a shopping centre to support the people
- ▶ Does this now fit into a plan to make Reydon a town and is that what the people of Reydon want
- ▶ I don't feel there is a need for more housing and if the UK pulls out of the EU, the country may be awash with unused housing
- ▶ This is a serious decision that could spoil the very special position Reydon holds
- ▶ Please listen to what the **people** want

#### **AP and AE Wolton**

On no account should the St. Felix playing field site still be considered when there are already other sites - both within and outside the village boundary. The Government's view on health, fitness and the war on obesity should immediately reflect this application. We understand, already many objections have already been submitted to you including national Sports Council etc.

#### **Historic England (Debbie Mack)**

Gorse Lodge Farmhouse Grade II to north. Potential impact on setting of Listed Building

#### **N/A (Kerry Pace)**

The environmental impact, the increased traffic, the over development of an area of outstanding natural beauty, are all reasons why this proposition should not proceed in its current form. The proposal is to build simply too many houses on this patch of land. Access would affect the 'gateway to Southwold', and it's hard to see how the additional traffic could be managed properly without causing major disruption and delays.

#### **Reydon Parish Council (Jean Brown)**



[Therefore,] none of the proposed large sites offered for development around Reydon (5,6,38, 117,18,138 in the options consultation, p51) will be needed and we believe these should not be considered for designation as development sites in the final Local Plan. Our residents strongly opposed the expansion of the village envelope in their response to the consultation for our Village Plan in 2014 which was confirmed more recently in the public response to the current application to develop land at St Felix School (site 138). There is simply no case for major development of housing or business accommodation on any of these sites, given the analysis of the housing needs set out above and the availability of undeveloped land at the current Reydon Business Park.

#### **SHRBUA (Graham Hay Davison)**

The area referred to in this location is in an area of AONB and outside the curtilage of the village boundary of Reydon. It is actively used as a sports field by both St Felix School and Southwold Rugby Club as a practice ground. Experience has shown that any attempt to build affordable homes in this location fails due to the lack of work opportunities in this area. It is undeniable that any attempt to provide affordable homes results in an increase of second/holiday homes when they are sold off due to lack of purchasers in the lower socio/economic strata to which these homes are targetted. The lower paid simply cannot afford "affordable housing" in this area where there is no work opportunity. In the adjacent St George's Square, eleven of the nineteen properties built there are second/holiday homes and infrequently occupied. The key worker houses built with this development were eventually sold off to the highest bidder due to lack of interest from the market at which they were aimed. Building more will only add to the already economically negative stock of empty houses with little social benefit to the area.

#### **Southwold and Reydon Society (Philip O'Hear)**

We believe this site is unsuitable for development for the reasons given in our objection to the current planning application. The site is a playing field in open countryside which is part of the AONB. There is poor access for the traffic that would be generated by the proposed development onto the busy Halesworth Road. The sewage infrastructure is already at or beyond capacity, There is no adequate replacement for the lost sports facilities.

Not only is the site unsuitable for all these reasons, no development on this scale is required in Southwold and Reydon to meet the targets for housing in this area of the district if the option is adopted to concentrate growth in Lowestoft. We regard this as the best option economically and as part of the much needed regeneration of \Lowestoft.

#### **Suffolk Wildlife Trust (James Meyer)**

Site 138 is adjacent to St Felix School Grounds CWS and, based on aerial photographs, may also contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the CWS or any existing ecological value that the site has.

### **139 - Shoe Devil Lane, Ilketshall St Margaret**

#### **Historic England (Debbie Mack)**



Church of St Margaret grade I listed to south west and various Grade II farmhouses around the village including Church Farmhouse, Corner Farmhouse, Ropers Farmhouse, Shoe Devil Farmhouse and barn and School farmhouse. Potential impact on setting of high grade listed building and other listed buildings.

#### **Ilketshall St Margaret Parish Meeting (Jane Waring)**

139 - Shoe Devil Lane - this site is not appropriate for development as the electric, water and broadband services to the village are stretched to capacity and any development would also require significant alterations to the narrow lane for access. Shoe Devil Farm at the end of the lane is a local landmark and as such would be adversely affected by development in such close proximity.

#### **140 - Site to the rear of 51 Old Station Road (1), Halesworth**

##### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

##### **Historic England (Debbie Mack)**

Wissett Hall grade II to north west. Potential impact on setting of Listed building.

##### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 106; 140; 141 the creation of 87 houses lacks adequate infrastructure on Wissett Road leading to Norwich Road, the narrowest junction in Halesworth, with the danger of increased traffic bordering the Edgar Sewter School.

#### **141 - Site to the rear of 51 Old Station Road, Halesworth (2), Wissett**

##### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.



**Historic England (Debbie Mack)**

Wissett Hall grade II to north west. Potential impact on setting of Listed building.

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Site 106; 140; 141 the creation of 87 houses lacks adequate infrastructure on Wissett Road leading to Norwich Road, the narrowest junction in Halesworth, with the danger of increased traffic bordering the Edgar Sewter School.

**142 - Southwold Police Station and former Fire Station site, Blyth Road, Southwold**

**Kevin Cross**

The former police & fire station land at Southwold is below the 5m contour line on the OS map. Homes would therefore always be at risk of flooding (unless you build them on stilts or similar).

**Jim Elmes**

Is already proposed.

**Peter and Deborah Gillatt**

We would support the development of site number 142, the position of the old police and fire stations. Other brown field sites throughout the area should also be exploited.

**Kevin Kinsella**

Some of the sites are significant in size and are clearly outside of the existing boundaries. Any housing expansion should be kept to identified sites within the boundary. As such we would not have an objection to the construction of housing on the site accommodating the Southwold police station and the old fire station (site no. 142: 40 homes) but we are opposed to all the other sites. We would also draw your attention to the fact that there are a number of other, potentially brown field sites, that are likely to become available between now and 2036.

**Historic England (Debbie Mack)**

Adjacent to Southwold Conservation Area - Potential impact upon views into and out of Conservation Area

**Oulton Parish Council (Carolyn Gosling)**

- Sites suitable for development:  
142 Southwold Police Station and former Fire Station site, Blythe Road



### **Reydon Parish Council (Jean Brown)**

With regard to housing, the remaining target for Southwold and Reydon could be met by the development of the Station Road site (142), some infill development in Reydon and modest expansion of the Reydon village envelope on the lines already allowed for affordable housing under the Rural Exceptions policy (DM22).

### **Southwold and Reydon Society (Philip O'Hear)**

This is a key brownfield site at the entrance to Southwold. It should be developed for housing as proposed. There will be infrastructure issues to be addressed in this development, including mitigating flood risk on the lower part of the site, provision of adequate off-street parking and sewage (the whole local sewage system is at or beyond its capacity).

Given the prominence of this location, considerable care will be needed in the design of any development to add to the character of Southwold at its sole point of entry.

### **Southwold Town Council (Lesley Beevor)**

The number of units that can be built on Site 142 in Southwold is grossly overestimated, and could not be achieved within the Ingleton Wood Design Framework, which will be part of our Neighbourhood Plan. If built as proposed, this would create a density of 137.9 units/hectare on the Fire/Police Station site, which is nearly three times as much as the current average density of new or proposed build in Southwold, which is 77.7 units/hectare. (This includes Tibby's Triangle, Station Road and Duncan's Yard. Housing without garden space is attractive to the second home/buy to invest/buy to let markets. We are seeking to limit these markets in Southwold in order to rebuild our population and create a more diverse demographic. We would like to see a mix of housing for different needs, as required by the NPPF. This includes families and younger retired people who seek garden space.

## **143 - St James Lane, St James South Elmham**

### **Michael Fontenoy**

St James is a village with poor transport links, it has been said that you find it when you are lost. It is a mainly agricultural village still and therefore has lots of large agricultural vehicular movements on lanes which they just fit into. Public transport is non-existent, a community transport bus provides a service to a different town once each day and is no use for commuting. There are no schools, shops, pubs or other typical infrastructure all meaning that everyone in the village drives somewhere to do anything. Those who do not or cannot drive are trapped.

Superfast Broadband only came to the village because people in the village paid for the connections instead of waiting years. Power is not assured with regular outages in winter, and low amperage is a common occurrence. Low water pressure is another factor to take consideration.

The number of houses suggested for the sites in St James would double the size of the village and the council will need to seriously consider how to overcome elements described above.

The existing housing stock is not densely situated and the number of houses would change the character of the village.



### **Janet Holden**

St James South Elmham does not have the infrastructure to increase in size, there are no buses or transport that runs on a regular basis, the nearest schools are a distance away for both primary and secondary pupils. I am concerned that increasing the size of the village, where we don't have mains drainage, where power supply is often interrupted and where residents had to pay for BT to install superfast broadband will add further pressure to an overstretched infrastructure. The development will increase traffic through the village on roads that are falling apart and poorly maintained. The fact that there is no public transport and that new developments often are occupied by families with children will mean that school run traffic will cause significant road safety concerns to pedestrians especially because there are no pavements through the village and the road is already heavily used by agricultural vehicles. In addition there are no facilities in the village, no shop no pub, no opportunities for young people's leisure, which means that the development will just result in people simply living in the location with no opportunity to support and build the community.

### **Ruth Key**

On behalf of my sisters and myself, I submitted a proposal for two areas of potential development land in St James South Elmham, sites referenced as 143 and 150 in your consultation document. We were rather surprised to see in your document that these have been identified as having possible room for 33 and 93 houses respectively, including a care home on the latter site.

We recognise that these housing figures are based on the standard densities you use for calculating a site's potential, but obviously in a small village such as St James, housing groupings of this size would create an over-dominant development. If these areas are included in your final plan we would therefore seek to work with Waveney Planning Department to create a development suitable for the village.

### **Historic England (Debbie Mack)**

Elm Farmhouse grade II to east. Church Farm grade I. Church of St James grade I and Moated site Scheduled Monument to north east. Potential impact upon setting of high grade listed buildings and Scheduled Monument.

### **St James South Elmham Parish Meeting (Mary Henry)**

Your Help Plan Our Future booklet shows (p 53) that two sites in St James South Elmham have been put forward by a developer/landowner as having potential for housing development and being suitable for inclusion in the local plan. We have the following comments about these two sites:

1. The maps show two large areas fronting The Street and St James Lane with capacity for 93 and 33 homes respectively – 126 in total. Having spoken to the landowner, the origin of these numbers is unknown, and it is not believed they formed part of the proposition made in response to this consultation. It is thought they were added by WDC.
2. As noted above, the village currently has 88 homes. This development would increase the size of the village by about 150%. We believe this is wholly disproportionate to the size of the village.
3. The development would also represent 50 times as many houses as would be a proportionate increase for the village under the scenario examined under Q7 above and be inconsistent with a housing strategy based on that approach.
4. It would imply a population rise from 205 to almost 500 and be significantly beyond the available infrastructure's ability to cope and beyond the scope of the current amenities. The communal village facilities are limited to a hall, a church, a village orchard and small wood.
5. The village is agricultural at heart and set in a deeply rural area. There is no likelihood of local employment needs generating housing demand of this scale.



6. The nature of the village is reflected in its structure and character, with agriculture coming right into the heart of the village. Development on this scale and on these sites would remove that distinctive feature and destroy the nature and cohesion of the community.

7. We do believe that some small growth in housing in the village, fitting with its size and character, on appropriate sites, and consistent with the rural area percentage as noted in Q7, above, could be considered.

In summary, the proposed St James developments are inappropriate sites, massively disproportionate in scale, unnecessary in the context of any of the Waveney development scenarios, unsustainable by the existing infrastructure, and damaging to the structure, style and character of the village. Small levels of additional development (up to 1 – 2 homes per year) might be sustainable and useful.

I hope these comments and observations will be useful. Should you have any questions about the content of this response do not hesitate to contact me.

### 144 - Station Road and Molls Lane, Brampton with Stoven

-

I object to the proposed site (144) along Station Road and Moll's Lane, Brampton because:

1. It is not 'infilling'
2. It is prime agricultural land
3. Molls Lane is too narrow for yet more traffic and has a difficult turning off Station Road, especially from the station direction.
4. There is no 'green' transport for working people. We have a limited bus service to Beccles and Southwold, none to Halesworth and the station is over a mile away with a very small permissive parking area.
5. We have no shop, PO, pub
6. A long walk to the school so possible more car journeys.
7. There is a large ditch which, I believe, should be left for drainage and wildlife. Many ditches are piped to the detriment of the environment.

Thank you for your time and I look forward to your reply.

#### Jeremy Arnold

Brampton Suffolk is a village with very dispersed housing and without a proper centre, no shop, no pub. It is possible to drive for over two miles within the village boundaries with mainly fields on either side of the road, and just the occasional house. The area of Brampton that is the closest to being a village centre is the part closest to the Primary School, Church, Village Hall, Bowls Club and former Brampton Dog pub. In my opinion, any housing development in Brampton should occur in this area, so helping to build a village with a proper centre. Therefore I would support developments such as proposals Nos 92 and 93 on Southwold Road close to the Primary School. (At the moment Southwold Road is frequently constricted by parked vehicles, and could therefore be usefully widened in this area.)

With regard to the proposed ribbon development along Molls lane, proposal No. 144, presumably of "executive" type houses, for the reasons mentioned above, I consider this inappropriate. If this land owner wants development on his land, then I suggest a much more appropriate area, part of what I think is the same field, would be a new road driven in from Station Road between the Bowls Club and the driveway to Manor Farm, no ribbon development, and the new houses on the new road, such as has already been done with Old School Close. Being close to the Primary School, Children's Playground, Village Hall etc. my suggested area would be helping to develop a village centre as mentioned above.

(\*\* Anyone doubting my claim to drive in Brampton for over two miles with mainly fields on either side of the road, I am referring to driving from the Brampton / Shadingfield boundary on the A145 London Road, via



Station Road to Brampton Station, according to Google Maps a distance of 2.4 miles, and passing about 15 houses next to the road!)

### **Alexander Carr**

I have been given a copy of your interactive map showing site 144 for potential development in Station Road and Molls Lane, Brampton for 15 new houses.

I understand that many of the proposed sites may not be required for development but cannot assure planning permission will not be granted.

Some years ago I contacted Waveney District Council and was told the place homes could be built in Molls Lane was on the field running from the vicarage (next to the telephone box) down to the Lower Road and that all other land was registered agricultural and could not be built on.

I very much hope the above still stands and the proposals for Station Road and Molls Lane will be removed from your present proposals.

### **B Carroll**

I understand from your new Local Plan that there is proposal to build 15 new homes in this area plus a possible further 50 and 90 near Redisham.

We will need more transport facilities than we have now, unless they all have a car each, which will mean 30 more cars using the lanes. A roundabout will need to be constructed at the junction of Molls Lane and Station Road to slow down the traffic coming from Redisham (30 miles an hour signs do not mean anything to some drivers) even coming round an S bend which Molls Lane comes out on.

The junction at the A145 will need to be improved. Look right and you are looking at a line pylons and road signs, look left and you have to ease into the road to see pass the Brampton Dog hedge.

Obviously, with children we will need a crossing over the A145 for them to reach the school.

Pavements will be required for people to walk along and street lighting for the winter months. We have none of these at the moment. Molls have a few street lights.

**JOBS JOBS** where will these people work?

Doctors! Where will these new people go. 900 homes in Beccles. Possibly 155 in Brampton and Redisham- at least two people per home. The doctors are struggling now. The NHS Trust cannot shut down facilities quick enough when they should be building more.

Electricity supply will need to be increased, sewers improved, increase water supply, telephone access, must not forget internet access, and drainage. We have a high water table with heavy clay soil, good drainage is essential. The ditches must be maintained. I would not expect a repeat of Carlton Colville where the builder of the Mardle made sure his buildings were alright, but flooded the original village houses.

I understand you are having to comply with government orders, but these market towns with their old roads built in the days of the horse and cart cannot cope. People move to the villages from the cities, but still want town facilities. We do not have a pub or shop. A farm shop has recently opened in Shadingfield, the next village on the A145, and the local Post office in Westall then it is either Beccles, Halesworth, Bungay or Southwold.



**Lynn Durkin**

We believe this land is totally unsuitable for development because, it is a country site there is nothing this side of Brampton, no shop, no pub, no school, just open fields and that is how the people who live here want it to stay, that's why we moved here!

Both roads are very narrow country roads with a dangerous sharp bend on the corner, where there has been numerous near accidents in the past with tractors, lorries, with the extra volume of traffic both from the site being developed and once developed there will be a serious accident(s) in the future. This side of Brampton also has no mains gas supplies and at times invariable drainage problems, Station road has no street lighting, Molls Lane has limited. No pavements on both roads.

Please look at other options.

Thank You

Mr & Mrs Durkin

**Ray Edwards**

I realize that at the moment this is future planning but the proposal by Waveney District Council to earmark land to build houses in Moll's Lane, is very strange as several years ago as the then District Council turned down a similar scheme as unsuitable on the same piece of land when proposed by a different farmer. So what has changed? The lane is still narrow and many of the vehicles that use this land exceed the speed limit by quite some margin.

The very large field has little drainage for such a huge area and ditches have not had any cleaning in the last 25 years that I know of. The Vicarage halfway down Moll's Lane has been vacant since October 2015 due to subsidence caused by the unstable conditions of the clay subsoil as is our bungalow also.

In winters of snowfall Moll's Lane becomes completely blocked with massive snow drifts and as winds can and do blow snow all the way from Shadingfield and is not cleared by the County Council!

Lastly the corner of Moll's Lane and Station Road is a death trap if travelling from Brampton Station and making a right turn into Moll's Lane, the maximum distance one can see down the road is only a few metres, it is so bad that I never attempt it as the near misses and minor bumps that drivers experience are just warnings of a possible fearful accident.

(photos enclosed)

**Stephen Fuller**

I wish to object strongly to the proposed development of 15 homes in Molls Lane, Brampton (Site No. 144).

Brampton is a dispersed settlement where development proposals should be considered very carefully; infilling would ruin the character of the village while estate development would totally overwhelm it.

My reasons for objection are:

- ▶ A previous planning application for 17 dwellings in Molls Lane, Brampton (DC/89/1090/OUT) was refused back in 1989 on the grounds "that it would be an undesirable addition for which there is no overriding justification to an area of scattered development beyond the main built-up area of Brampton". There has been no change in circumstances in the area since this date, therefore these grounds still apply.



- ▶ Complete lack of local infrastructure:
  - o No local shop – the closest shop is 2 miles away in Westhall. The current proprietor is in his 90's and the shop is likely to close on his retirement.
  - o Unsuitable country lanes – there's no pedestrian pavement and several dangerous blind bends on adjoining roads. An increase in traffic will therefore increase the risk of potential accidents
  - o Molls Lane is single lane and totally unsuitable for our modern 21st Century world of regular internet deliveries via large vans and lorries. This is already evident today and will only get worse.
  - o The inadequacy of Molls Lane to accommodate even small increases in traffic, and because road widening would destroy ancient field boundaries. Geographically a number of hedge-line drainage ditches have been filled in without the correct understanding of the impact on local housing; this has resulted in building damage. With the addition of a high water table any development would impact on the local rainwater drainage.
  - o Nearest train station is 1.5 miles away. Access by foot is highly dangerous down unlit, narrow, country lanes with no pavements. Onsite parking is extremely limited.
  - o No high speed broadband
  - o No mains gas – new houses would have to use oil heating which is not environmentally friendly.
  - o Public sewers are inadequate for additional housing
- ▶ Loss of high quality agricultural land and potentially trees. The Government has communicated through various types of media that agricultural land is essential for food production.
- ▶ Lack of local employment – the nearest areas of major employment are Norwich & Ipswich.
- ▶ There are better alternative sites available – priority should be given to “brown field” sites rather than “green field” sites.

### **Middleton**

Whilst not directly affected by this proposal, I do think that building new houses on this site is not a good idea.

All new residents in Brampton will have to travel several miles by car to shop as there are no shops nearby. The bus service is inadequate for shopping purposes, there is little chance that the service will improve, and there is no guarantee that Anglian Buses will even continue visiting Station Road and Molls Lane.

The adverse affect on the environment would appear to be far less if new homes were built close to Beccles

Accessing the A145 from Station Road is not good with regard to viewing traffic coming from the Beccles direction. There is 30mph speed restriction on the A145 at this junction, but seldom observed.

The value of some of the existing properties on Molls Lane will undoubtedly be adversely affected. The open views across the fields will be lost and their properties will be overlooked.

If the Council do decide to allow new houses to be built in this area, then surely using the land on the north side of Station Road would be far better. This would not adversely affect existing properties, and would give the new residents uninterrupted views across open fields to the north and south. I believe that the owner of the site number 144 also owns this land.



### **Les Tarver**

I object to this proposal for the following reasons:-

There is no shop, post office etc in the village and journeys to such facilities will involve car journeys in the vast majority of cases.

The land involved is prime agricultural land.

The proposal does not contribute to reducing private car journeys and promoting the use of public transport. If occupants of the proposed dwellings work out of the village they will have to drive. There is no public transport suitable for journeys to any destination which would enable people to travel to and fro even for basic 9 - 5 work hours and Molls Lane, in particular, is too narrow for an increase in daily bus journeys. Please note that the railway station (the only option for travel to nearby Halesworth and points south and a possible option for journeys to Beccles and Lowestoft) is up to one and a half miles from the site along a road with no footpath and dangerous bends for pedestrians. The station car-park is small and privately owned and inadequate for current needs, let alone increased use. The school is up to a mile from this site, again along roads with no footpath and with a crossing of an A road (the A145) at a junction with limited visibility. Journeys to and from the primary school are thus inevitably going to be by car.

I believe that any new local plan should have at its core consideration of 'green' issues, particularly reducing the number of private vehicle journeys and facilitating the use of public transport. By this yardstick the proposal is seriously flawed.

### **Historic England (Debbie Mack)**

Manor Farmhouse grade II listed building to east. Potential impact upon setting of listed building.

## **145 - The Bull Field, Ringsfield Road, Beccles**

### **Mr R & Mrs P Crack**

We have concerns regarding:

1. Road Access
2. Ability of community services to cope.
3. Ability of existing water, sewerage and drainage systems to cope.
4. Lack of Public transport serving the area

#### **1. Road Access**



The site is in close proximity to the Sir John Leman High School. Ringsfield Road is very congested on school days, with extra cars parked along the road and in neighbouring streets. South Road has had pavements widened, but the remaining road width causes many near misses - it is not suitable for 2 way traffic, and any additional traffic would add to this problem. Meadow Gardens is currently a dead end with little space for passing parked cars (it also has the cycle path entrance/exit to/from London Road). Any changes in traffic flow or volume could compromise the safety of those using the cycle path, which was introduced to provide a safer means of accessing this part of town. Please also see item 4 below.

## **2. Ability of Community Services to Cope with Extra Demand**

The Beccles Medical Centre and local pharmacies are already stretched beyond acceptable limits. There is a shortage of GPs and other vital health and social service workers which means the local services cannot adequately serve the current population. Any additional residential developments (especially those which are designed with elderly people in mind) would add to these pressures. The Sir John Leman High School already has to turn away prospective pupils as it is full. Where will these new residents access work, education, healthcare and social support?

## **3. Ability of Existing Water, Sewerage & Drainage Systems to Cope**

There have been previous issues in the area regarding water pressure. Sewerage systems already struggle to cope with demand. Heavy rains result in flooding. The existing infrastructure struggles to cope. What assurances are there that any proposed developments will not add to these problems?

## **4. Lack of Public Transport Servicing the Area**

Although there are several bus stops in the South Road and Upper Grange area, most of these are not currently served by public transport. Indeed, in several cases, by the time the installation of the bus stops and kerbs was completed, the buses were no longer serving this area. If the proposed development goes ahead, how are the residents expected to get about? Those with a car will simply add to the daily Beccles gridlock and the hunt for a town centre parking space. If they need to go to the Medical Centre there is limited parking when they get there. Those without a car face a long walk into town with very few resting opportunities en route, or an expensive taxi journey. It may well be possible for the existing cycle path network to be extended into this development, but not everyone is able to ride, or afford, a bicycle. With increased traffic volume both cycling and walking become a less attractive option due to safety concerns.

### **Garry Nicolaou Kiriakis**

As someone who backs onto site no 145 I am horrified that I had no notification of any planning proposals or consultation process from WDC. I was only notified through word of mouth.

I have major concerns that should this site be developed for c. 90 homes the infrastructure surrounding the site would be wholly inadequate. Already the volume of traffic at the SJH school and Beccles Sports Centre causes congestion, parking difficulties and poses a traffic safety risk especially during term times and throughout the weekend (sports activity). The use of this greenfield site would have an immediate impact on local residents and on the extensive wildlife that occupies the margins of the site and surrounding area. I would suggest that if development had to take place it should happen nearer to the proposed southern link road so that current residents are not adversely affected. 90 houses would need more roads, more schools, more recreation facilities and I believe this is not the most appropriate site to develop these requirements. Just to give you some idea of the wildlife that would be affected, here is a list of species I have spotted in the



margins of the field, in the trees in the field and in my garden (plot 145)

Mammals – Pipistrelle and noctule bats, hedgehogs, squirrel, fox, muntjac deer

Amphibians – frogs, toads (and hence probably newts) in the dyke surrounding the plot.

Resident bird species – barn, tawny and little owls in oak trees in the plot. GS woodpecker, LS woodpecker, Green woodpecker, bull finch, pheasant, partridge, siskin, yellow hammer brambling, wood pigeon, collared dove, mistle thrush, song thrush, gold finch, treecreeper, blue, great and coal tit, long tailed tit, chaffinch, house sparrow, greenfinch.

Migrant species – turtle dove, white throat, black cap, willow warbler, chiffchaff, redwings, fieldfares.

Developing this site would impact directly on these species.

### **Paul Leman**

I do not think this site is suitable for housing / development for the following reasons:

If there is to be any access via Ringsfield Road, there is a definite safety issue. Ringsfield Road is generally very congested, Not just during school hours, but also weekends and evenings, given the popularity of the Sports Centre and playing field. Much of the time the road is single width only. We have to time our car journeys to and from our property to avoid the worst of the congestion. Visibility on the road is compromised by parked / stationary vehicles, making road conditions dangerous. This has resulted in damaged vehicles and accidents. Any additional traffic on the road will exacerbate this situation.

The Medical Centre in Beccles is already stretched, any further development will put a further strain on this facility.

There is an issue with drainage on the Bull Field which raises serious concerns.

The Bull Field contains several mature oak trees which need to be conserved. One of the trees is a protected owl nesting site, with limitations on encroachment. There is also a considerable amount of bird and mammal activity which enhances our future environment and should be protected.

The majority of local people who may be effected, are not aware of this proposal. Not everyone takes a local paper, so people need to be informed and given the opportunity to voice their opinion, to obtain a balanced view.

Paul & Helga Leman

### **Mr McGregor**

The development of this site would bring disproportionate disruption to a particularly quiet area of town in relation to the amount of housing it would provide.

If it was to be developed I would recommend a low density site of single storey buildings that are adapted specifically for elderly or people with limited mobility.

The surrounding roads already face heavy use due to there being two schools and a leisure centre nearby so more vehicles would be a huge detriment. In fact many children walk or cycle in this area so it would make it less safe for them.



It would also mean more vehicles having to go through the centre of town to get to the ring road or shops. Ringsfield road offers visitors an appealing entrance into the area which would be compromised by more development and it would significantly unbalance the feel of the town.

### **Geoffrey Nobbs**

This proposed site has problems of access in that the only options are for traffic to enter and leave via either Ringsfield Road or Meadow Gardens. In the case of Ringsfield Road access would be in the vicinity of a sharp double bend next to the Sir John Leman School Playing Field and then continue past the Sir John Leman School; and then St Benet's Primary School before having to cross the junction at St Mary's Road. This option also has the problem of the associated traffic with the two schools along Ringsfield Road where there are considerable numbers of parked vehicles during the working day as well as school buses which reduce the road to a single lane for a considerable length at times. The other option means traffic passing along the narrow Meadow Gardens before having the option of turning right into South Road and continuing on to London Road. South Road narrows considerably in the vicinity of the Cemetery before joining London Road near a pedestrian crossing. The proposed development suggests at least 94 dwellings which could equate to a significant number of vehicle movements during the day onto two roads with problems. It must be assumed that the majority of residents on this site would need the use of a car to travel to and from their places of work.

The field itself although farmed has a number of mature trees within the field rather than on the boundaries which form part of the area's biodiversity and should be protected. In addition there is a margin of land left unfarmed on the North side of the field providing cover for nesting birds etc.

### **Mr Rowbottom**

I would be against opening a road out of Meadow Gardens because of the increase in traffic this would cause in a road which is already busy enough. If access was from elsewhere I would have no objection to further building development on this site.

### **Rosemary Shaw**

I am writing with reference to sites 145 and 24. The development of these sites would increase traffic on Ringsfield Road, which the proposed new road linking London Road to the Ellough Industrial Estate would not extend to. Traffic from these two sites would go into the town centre and congestion outside both the schools on Ringsfield Road (Sir John Leman High and St Benet's primary) would increase. Ringsfield Rd is also part of the national cycle route network (route 1). If Ringsfield road is developed in this way, the logical corollary will be that pressure will mount for a south-western distributor road to link London Rd with the B1062, whereas the whole purpose of the new southern relief road in Beccles is to channel traffic onto the A146.

The most sustainable sites for development are those which would be served by the new road to the south, namely site numbers 8, 9, 81, 82 and 107 - and this would also apply to sites like number 124. It would also make sense if these sites (8, 9, 81, 82, 107) had good cycle paths and walkways into the centre of Beccles even though they would primarily be served by the new southern relief/distributor road for motor vehicles.

### **R Simpson**

My concerns for this site are as follows; for a small development it will have a huge impact on small local roads, Ringsfield rd and South road. These two roads already have extreme congestion with school run and school



busses from two schools twice a day plus a leisure centre. The junction of Ringsfield and St Mary's is particularly perilous for most drivers.

Also there is no capacity for the schools to expand including nearby Albert Pye as this has already occurred recently.

The surrounding roads are already choke points at the bottom of South Rd and Ashmans Rd.

It would be an advantage for a new development to include the ability to build new schools. I propose sites 8, 9, 81, 82 and 62 as this also would include the new link road which the new houses need to feed into.

This field also is hunting ground for local Owls.

The houses at the end of Meadow gardens have a risk of flooding, a development would increase this risk.

### **Beccles Town Council (C Boyne)**

Whilst the council appreciate the need for development in the area over the next twenty years, it must be handled with great care as the infrastructure in Beccles is at breaking point now, especially the Health Centre. With this in mind, it is felt that any housing development should be restricted to the area to the South West on one or two of the sites numbered 24, 43, 108, 145 and 156, as this makes the best use of the existing and planned road infrastructure. However, this area would require a new primary school and a convenience store and other associated infrastructure to service any expansion. In addition, the two small sites in Beccles, numbers 1 and 16 and site number 60 in Worlingham could also be included as sites for development.

### **Historic England (Debbie Mack)**

Proximity of grade II\* Ashman's Hall to north west and Conservation Area to the east. Potential impact to setting of high grade Listed Building and Conservation Area.

## **146 - The Hill, Shipmeadow**

### **Alison Arnold**

This site is just in front of a Grade II listed building, the former workhouse, which is now known as Viewpoint Mews. Developing on this land would take away the beauty and originality of this site and detract from the attraction of living in the workhouse development. It would affect the view from the properties and most likely would also affect the prices of these properties. Shipmeadow is a little hamlet with no facilities except for a farm shop which is most appropriate to the area. We would not want any other shops etc., that would inevitably be campaigned for if more houses were built. I strongly object to this site being proposed for development and will ensure that all other owners/occupiers of Viewpoint are aware of this proposal.

I hope that you will take my comments onboard.

Regards

Alison Arnold



### **Christopher Arnold**

This is not an appropriate site for development.

1. This is a beautiful greenfield site with outstanding views across the Waveney Valley. This would be lost if a large housing development was built.
2. This site adjoins a grade 2 listed Victorian Work house.
3. Vacant land on the edge of the Town needs to be developed first.
4. A land owner wanting to make money by selling his land is not a good reason to use it. Especially when it is highly unlikely that this development will be thoughtfully designed to seamlessly fit into the beauty of the countryside.
5. 60 houses on a small plot will be an eyesore and will clearly not seamlessly fit in.
6. I believe that the extra volume of traffic leaving onto a fast road would be a danger, especially as the access road would probably be nearer the corner and visibility of fast oncoming traffic from Beccles would be very poor. This is particularly evident leaving Viewpoint Mews. This junction is nearer Bungay and is still a dangerous exit, particularly turning right.
7. The residents of this area have worked hard to stop wind turbines being built here. This would be an even larger blot on the landscape.

### **jfmb**

The proposal for 60 homes is completely out of scale for and must be about the existing number of dwellings in Shipmeadow Parish. The development is completely unsustainable. The Parish has no facilities is dependent on Beccles and Bungay for all its services. There is no public transport and no safe way for pedestrians alongside the B1062. The main drainage system may not be sufficient.

The only way for the proposal to be even considered is for the developer to provide a shop, agree to subsidise a continuing bus service between Beccles and Bungay and meet the cost of any upgrade to utilities. Even then, it will completely change the character of the parish and its benefits must be doubtful when compared to developments elsewhere.

### **Samantha Kent**

The land is completely inappropriate for building. It's situation is in the beautiful waveney Valley. It's located on the same site as a grade 2 listed building that's 250 years old. New builds would not be in keeping at all. The building itself is named viewpoint which it wouldn't be with new houses built. The proposed build would have



a serious negative effect on property prices as the views, quiet and natural beauty is its selling point. Owners would live in a town if they wanted hundreds of neighbours. The land has drainage running underneath also. The beauty and tranquillity of the countryside should remain just that and not spoiled by noise and an eyesore of a modern housing estate. There are far more appropriate sites that are within built-up areas, with amenities close by. This site would pose serious problems for a car-less family and there isn't a bus service. The field itself is also a haven for wildlife, seeing numerous bees, birds and bats upon an evening.

### **Phil Starling**

With regards the above site 146. The site of Shipmeadow workhouse is a site of national historical importance. The buildings are all grade 2 listed and any new development in this area would seriously detract from the character, presence and integrity of the site.

Additionally the sewerage and drainage from the workhouse site runs through the middle of this field and if compromised will lead to serious issues for all residents.

As an owner of a property here I specifically chose this site for its Georgian listed status, privacy, originality and green belt status with its fantastic views across the Waveney valley. Any new development would impact extremely negatively on the listed status of the area, the natural beauty of the area and additionally on the wildlife presence here (owls, bats) not to mention possible compromise of services and access issues. It would also impact negatively on property values and as such I would like to register my **STRONG OBJECTIONS** to any consideration of development here.

I am sure there are far more suitable sites to consider without destroying a beautiful historical area with conflicting building types and impacting on the environment and wildlife.

### **Barsham & Shipmeadow Parish Council (P Smith)**

With reference to the above. Barsham and Shipmeadow Parish Councillors' response to site reference 146 The Hill, Shipmeadow, 2.02 hectares of land which has been proposed to use as housing for an indicative 60 homes is listed below:

1. The Hamlet of Shipmeadow would be more than doubled by a development of this size
2. 60 homes would be too dense a development and would have a negative impact on the landscape of Shipmeadow
3. This would be a car-dependent community requiring the use of cars for commuting to work and leisure activities. There is no bus service, no cycle track and no pedestrian footpath along the B1062 between Beccles and Bungay
4. The infrastructure of Shipmeadow's waste water is at its capacity and would not cope with the volume from 60 new homes. The owner/property developer would need to address this
5. No employment
6. No local facilities
7. Danger with the extra traffic emerging from the 60 homes, exiting on the B1062 close to a corner on a fast



road

8. The Parish Council is against the suggestion of this site being used for future development.

#### **Barsham and Shipmeadow Village Hall (L R Hatton)**

This major development of 60 homes would double the population of Barsham and Shipmeadow. These villages have small rural communities with little in the way of amenities to support their escalating populations. There is not a pub, garage, shops, Post Office or news agent. All we have is slow broadband, poor electricity and water services, a telephone kiosk, a church and a village hall. I am chairman of the Barsham and Shipmeadow village hall and have a long and clear experience of organising facilities in the locality.

I doubt that the community could accept or accommodate such a large influx. There is no local employment and thus would bring significant increase in traffic on the B1062. All present access points to this road are narrow with poor line of sight in both directions. I have to be very careful when entering and leaving the road and have had several near misses. The planned reduction to 50 mph may help somewhat.

On a personal note I would object to having what would be a small village on the boundary of my property, which would be out of character in such an attractive agricultural environment as the Norfolk Broads.

#### **Broads Authority (Natalie Beal)**

This site is on rising ground with the potential for impacts on visual amenity and landscape character (LCA2 and 3). Views across the valley are panoramic. The existing development in this area breaks the skyline. This area of land outside the Broads forms its setting for the Broads. If this site was to come forward it will have to be very carefully designed in order to mitigate likely impacts which would need to be assessed very carefully.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 1 and drinking water protection zone

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Historic England (Debbie Mack)**

Former Wangford Hundred Workhouse grade II and former Wangford Workhouse Chapel grade II to the south, Manor Farmhouse grade II and Barn grade II\* to north and Church of St Bartholomew grade II\* to east. Potential impact upon setting of high grade listed buildings.

### **147 - The Old Rifle Range, A12 London Road, Gisleham**

#### **Teresa Garbutt**

As a long-term resident of the Waveney area, please find below my thoughts/comments on three of the



proposed blocks of land:

Site 22 (117 proposed dwellings) – Hammonds Farm

Site 147 (473 proposed dwellings) – Old Rifle Range

Site 98 (54 proposed dwellings) – Rear of Elizabeth Terrace

These three sites provide a fabulous opportunity for different types of housing in South Lowestoft. Each block of land could provide a specific type of housing to meet different needs, and together they would form a diverse development that accommodates residents of all ages. The three sites could be developed as follows:

Site 22 – Affordable rented 1-2 bed apartments

Site 147 – Affordable rented 2-3 bed houses

Site 98 – Affordable rented 1-2 bed retirement accommodation (flats/bungalows)

Sites 22, 147 and 98 are also ideally placed to service this diverse range of residents, and the surrounding amenities would fulfil their requirements and provide a greater quality of life:

1. Close to schools for those with children
2. Close to shops (literally over the road, so can leave car at home and reduce carbon footprint)
3. On main bus route – Lowestoft to the north, and Kessingland/Southwold to the south
4. Close to the beach. This provides a free 'day out' for those with young children, and a pleasant walk in the fresh air for older residents. Many elderly people have mobility issues, and the proximity of the beach to the three sites makes it feasible in terms of exercise and enjoying the natural environment

This site could also provide an opportunity to provide a new type of private 'rented' property to the residents of Waveney. A large percentage of the population are now priced out of the housing market, and according to The Guardian, 'by 2025, more than half those under 40 will be living in properties owned by private landlords' (2015, see link below).

<http://www.theguardian.com/money/2015/jul/22/pwc-report-generation-rent-to-grow-over-next-decade>

Unfortunately, many of these people are not only priced out of the housing market, but are also ineligible for Social Housing. This leaves them in a 'no mans land' of private rentals, with little long-term security based on the current practice of 'two months notice' within their tenancy agreements.

Could Waveney provide quality and affordable 'private' rental properties that give greater security to tenants? After an initial six months probation within the property, could a longer lease period be agreed between tenant and landlord (say 5-10 years) as they do in continental Europe? This would be beneficial on several levels:

- Landlords have the security of knowing they have a quality tenant in their property
- Tenants have the security of knowing they are not permanently on 'two months notice' within the property.

(This also encourages investment in the property by the tenant (new carpets, decoration etc), that they may not feel committed to make on a short term notice lease)

- Tenants looking to rent for a fixed term (5-10 years) could use that period in an 'affordable' rented property to save up for a deposit on a place of their own. If they subsequently become part of a couple, then a double income can assist in this process

All of the above contributes to a greater harmony in the landlord/tenant relationship, and provides stable and



realistic housing opportunities for the residents of Waveney.

I believe that these three sites have fabulous housing potential within the Lowestoft area, and provide a very good quality of life for the future residents who live there.

### **Bruce Provan**

It is crucial to keep the buffer between Lowestoft and Kessingland.

### **Tegerdine**

On behalf of Martin and Lawrence Tegerdine, we wish to support the development of Site 147 for housing and associated purposes. We have reviewed the Initial Sustainability Appraisal of the Emerging Site Options, and consider that site 147 represents a sustainable and deliverable site, capable of accommodating a significant quantum of the planned growth for Lowestoft, whilst also providing an opportunity to create an attractive, defensible southern boundary to the town through a well-designed Sustainable Urban Extension.

The site would represent a logical and sustainable extension to the settlement at the southern edge of Lowestoft/Pakefield, particularly if allocated in conjunction with site 22 to the north. A comprehensive Masterplan for the sites would facilitate the creation of a Sustainable Urban Extension in this location, which would not only provide much-needed housing, but also make provision for community facilities and other infrastructure, whilst providing a natural and defensible southern boundary to the town in the longer term.

At present, the southern edge of Lowestoft in this location is poorly defined, and unattractive. Development of the northern-eastern quadrant of site 147, together with site 22, for housing would provide an opportunity, through a comprehensive landscaping scheme, to create a clear buffer and a defined edge to the settlement. If built development is concentrated at the northern end of the site, the southern and western parts could provide a significant area of open space, which would not only provide a community asset, but also an opportunity to enhance the appearance of the town and create an attractive entrance to Lowestoft from the south when travelling along the A12.

At present, there is an undeveloped stretch of frontage to the east of the A12, between the southern edge of Beach Farm Residential and Holiday Park, and the northern edge of the row of cottages known as Catherine Terrace, Elizabeth Terrace and Barnard's Terrace, which measures less than 200m. However, whilst undeveloped, this stretch of the A12 does not have a rural or remote character and appearance; when travelling northwards on the A12, there is a clear change in character from more rural to urban and developed, which occurs at the Morrisons Roundabout, opposite Catherine, Elizabeth and Barnard's Terrace. On the western side of the A12 is an existing industrial area, and a more recent retail area. In addition, planning application DC/15/5066/FUL was granted a resolution to approve in April 2016, for 4 additional retail units, a café and a flexible retail/restaurant unit at the junction of Tower Road with the A12, to the immediate north-west of the site. If built, this will further alter the environs of the site, emphasising the urban and developed nature of this part of Lowestoft. Residential development of the northern part of site 147, and site 22, would balance this development on the opposite side of the A12, and provide an opportunity to 'round off' the southern edge of the town in an attractive, robust and defensible way.

As described above, in order to overcome any concerns regarding landscape impact and the loss of the undeveloped gap (designated in the Adopted Local Plan as a Strategic Gap) between Pakefield and Kessingland, it is suggested that development of site 147 could be concentrated at the northern end of the site, with the triangular section at the southern end being used for open space and therefore continuing to fulfil the function of the Strategic Gap. This approach would result in the loss of a stretch of approx. 300-400m of the Strategic Gap, but in reality this area of land makes only a minimal contribution to the function of the Gap at present. From the A12, glimpses through to the coast are at best extremely limited, and are mostly obscured by Pakefield Caravan Park, and the row of cottages known as Catherine Terrace, Elizabeth Terrace



and Barnard's Terrace.

The northern edge of Kessingland is very clearly defined, with a very distinct east-west boundary between the countryside and the settlement. With the exception of site 85, a relatively small 2.66ha site, landowners have not suggested any significant expansion of the town in this location, and it can therefore be assumed that this edge of the Strategic Gap will remain largely unchanged. On this basis, a Strategic Gap of between 2 and 2.5km could still be retained between the southern edge of Pakefield, and the northern edge of Kessingland, which is more than sufficient to ensure that the function of the Strategic Gap, as defined in Policy DM28 of the Adopted Development Plan, continues to be fulfilled. Concentration of any development within site 147 in the north-eastern quadrant will also assist in ensuring that the undeveloped stretches of coastline remain unaltered.

Residential development of the northern part of site 147 would be well-contained in landscape terms, and, subject to a comprehensive landscaping scheme, would have minimal impact from public viewpoints. Development would be kept away from the cliffs and the County Wildlife Site, in order to address concerns regarding coastal erosion and impact on ecology/biodiversity. This would also limit views of the development from the beach. Restriction of development to the northern and western parts of the site, could be secured through either a Development Brief or Masterplan for the site, specifying the extent of built development, and identifying the parts of the site to remain undeveloped.

In terms of accessibility and sustainability, there is an existing footway on the eastern side of the A12 which allows pedestrian and cycle access into Pakefield. The site is well-served by public transport, with regular services to Lowestoft and Great Yarmouth to the north and Kessingland and Southwold to the south, running along the A12. The site is well-located in relation to the existing Primary School in Pakefield, and the new High School which is currently under construction on London Road, approximately 500m to the north of the site. The proposed retail units to the north-west of the site, for which a resolution to approve has been granted, and the existing retail units further south, are readily accessible by foot or by cycle, as are the employment areas to the west.

Contributions to community infrastructure could be secured either through CIL payments, or through on-site provision. Allocation of the site, in conjunction with site 22 of the north, would enable a comprehensive masterplan to be drawn up for a Sustainable Urban Extension to the south of Pakefield, which would consider the provision of all types of infrastructure.

Whilst the site is currently undeveloped Greenfield land, it has not been in productive agricultural use nor used for grazing, since 1912 when it was first used by the Ministry of Defence as a military rifle range. Its loss for housing development would therefore have a far less significant impact than the loss of other sites on the edge of Lowestoft that are currently in productive agricultural use. Indeed, development of the site represents an opportunity to bring the site into productive use, which is not likely to occur otherwise; the nature of the site's previous uses does not make it desirable for either agriculture or grazing. The size of the site is such that it would be capable of delivering a quantum of development that is capable of making a significant contribution towards the Council's required housing numbers, and would in turn reduce pressure on the Council to release more sensitive sites for housing.

The site is deliverable, as defined within the National Planning Policy Framework. It is available now, and as described above offers a suitable location for development now. Development of the site would be viable, and housing could be brought forward within the next 5 years.

In conclusion, it is considered that development of the north-eastern quadrant of site 147 could provide a considerable quantum of the new homes planned for the District and more specifically Lowestoft, in a sustainable location that is well-related to existing and proposed services and infrastructure and which provides an excellent opportunity to create an attractive entrance into Lowestoft from the south, with a clear and defensible southern boundary to the town. Development of the site would not undermine the function of the Strategic Gap between Pakefield and Kessingland, and the site is capable of providing a significant area of public open space, to the benefit of the wider community, and meeting infrastructure needs either on-site or



through financial contributions.

### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Partly in Flood Zone 2 and 3

\*Flood Zone – A floodplain is the area that would naturally be affected by flooding if a river rises above its banks, or high tides and stormy seas cause flooding in coastal areas.

<http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

### **NorCas**

This is an open coastal area and adjacent to the Heritage Coast. Totally inappropriate to build on this land and it should be opened up to be a wildlife site for coastal flora and fauna. A vital gap between Pakefield and Kessingland. .

### **Suffolk Wildlife Trust (James Meyer)**

Site 147 appears to partly include Pakefield Cliffs County Wildlife Site (CWS) and, based on aerial photographs, may also contain habitats and species of conservation value. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on either the CWS or any existing ecological value that the site has.

## **148 - The Sawmill, Sandy Lane, Holton**

### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

### **Jeffrey P Geering**

On behalf of Mr J Geering, we wish to support the allocation of site 148 for residential use, to deliver approximately 20 dwellings.

In accordance with the NPPF, the site is deliverable, inasmuch as it represents a suitable location for development, is available immediately and would be viable.

### Suitability

The site is located immediately adjacent to the settlement boundary of Holton, in easy walking distance of the village's primary school and other facilities. Holton is categorised in the Adopted Local Plan as a larger village, which recognises the presence of a range of services in the village. In addition, it is close to the market town of Halesworth. As such, it represents a sustainable location for development, and a modest level of growth will ensure the future vitality of the village, helping to sustain the local services and facilities. At present, the village pub is closed, although it continues to offer Bed & Breakfast accommodation; an appropriate scale injection of new households into the village may act as the catalyst for the re-opening of this important community facility.



The site constitutes Previously Developed Land, having been used as a sawmill for some 200 years, with current consent for storage and distribution, with an element of ancillary retail use, secured under planning permission reference DC/10/1572/FUL. Development of this site would, therefore, be preferable to the release of Greenfield land elsewhere around the village, and would be in line with the NPPF, and Core Strategy policy CS01, which seek to ensure that Previously Developed Land is brought forward in preference to Greenfield sites. Development in this location would protect the important and more sensitive areas of undeveloped land around the village from pressures to accommodate housing. It should be noted that the Initial Sustainability Appraisal of the Emerging Site Options, incorrectly identifies the site as Grade 3 Agricultural Land at point 11 of the matrix; this directly contradicts the comment at point 14 which states that development of the site would result in the loss of the site from employment use. As previously described, the site has not been in agricultural use for at least 200 years; this is widely acknowledged by the Council, for instance in the Committee Report for application DC/15/0871/FUL which describes the site at paragraph 2.1 as a “long standing commercial site”. Whilst the site is, technically, an ‘employment site’ it is not currently in use, and although the consent for storage and distribution is extant, the building works have not been completed, and this use has not been brought into place. Consequently, its loss from an employment use would not have any negative impacts.

In contrast to many of the other sites put forward through the ‘Call for Sites’, the site would not result in the coalescence of Holton and Halesworth, and would not have significant landscape impact, being relatively well-contained and screened within the wider landscape. As such, it represents a more suitable location for growth of the village. Sites 65 and 87 are both located within the identified Strategic Gap between Holton and Halesworth, which the 2015 Green Infrastructure Strategy identifies as important to the character of both communities, and states should be protected.

Whilst the site is located immediately adjacent to the Holton Conservation Area, sensitive development of the site would ensure no adverse impact on the Conservation Area, including views into and out of it.

The site is adjacent to the Holton Pit SSSI, which is designated for its geological significance, specifically the exposed sediment sequence. In accordance with Natural England’s views on management of the SSSI, development at the site would not result in concealment of the features of interest, i.e. the exposed rock face, and would therefore have no adverse impact on the SSSI. In addition, a County Wildlife Site is located to the east; sensitive development of the site can help to ensure that there is no adverse impact on this site.

#### Availability

The site would be available for development immediately, and it is envisaged that housing could be delivered within 3-5 years. The site is within single ownership, and the owner is willing to release it for development without delay.

#### Viability

Development of the site for residential purposes would be viable, taking into consideration the policy requirements in relation to matters such as affordable housing provision and CIL contributions.

#### Conclusion

As outlined above, the site is suitable, available and viable, and can therefore be considered deliverable, in accordance with the NPPF definition, and the use of the site to deliver approximately 20 dwellings would represent sustainable development. Environmentally, the site is the least sensitive of those put forward on the fringes of Holton, being located away from the Strategic Gap between Holton and Halesworth, on previously developed land, which is well-contained in landscape terms. Local services, including a primary school, are easily accessible on foot, and there are good public transport links. Economically, development of the site would put an under-utilised brownfield site back into productive use, and would bring benefits to the local economy, helping to sustain and bolster local services and facilities in the village. Socially, development for housing would not only provide much-needed accommodation for local people, it would also deliver a policy-compliant level of affordable housing.

**Jeffrey P Geering**



The current volume of housing shown for this site is 5 (five). Please amend with a number that would be indicative of a site this size, similar sites of a similar size in the local area would suggest a number between 45-55. Notwithstanding the final development use is open to discussion and as the owner I would welcome feedback from the planning office and any other interested parties.

regards,

J P Geering

**John Lavery**

Why not leave this in its traditional use as an area for light industry, instead of cramming in housing/ care homes?

**Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

**Halesworth Town Council (N Rees)**

Similarly, Sites 73 and 121,103, 148 are classified as Holton and HTC and Holton would need to look at this together.

**Halesworth Town Council (N Rees)**

Sites 32, 103 and 148 are Holton.

**Historic England (Debbie Mack)**

Adjacent to Holton Conservation Area. Also proximity to Montagu Cottage, K6 Telephone Kiosk, Holton Mill (post windmill) and Millside and Myrtle Cottage, all grade II listed. Potential impact upon setting of listed buildings and Conservation Area.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

It is difficult to see how this site could be developed as the access is very restricted. The area is part of a natural open space in Holton



## 149 - The Street, St Margaret South Elmham

### Anonymous

I would like to bring to the attention to the planning dept. that this small quiet village has no school, no shops, no doctors surgery, no leisure facilities, few if any local jobs and a road network which is only fit for horse and carts, surely therefore it would be logical to build new houses close to places where these amenities already exist and a road network which can cope with the extra traffic. I also like many others can see the decline in wildlife in general, and development in rural areas in my opinion will only add to this decline. I just hope if permission is given it does not open the flood gates for more of the same.

### L Blaxland

I have just heard of the plan to put fifty six extra houses in the village.

I would like to object in the strongest possible terms.

There are only 35 houses at present – no main drainage or other facilities – shops – buses, lighting.

Please do not spoil the well loved and tended small communities which remain in this area.

I can assure you we value them very highly.

### John Riseborough

The amount of houses submitted for this piece of land would double the size of this very small village. Also there is no sewerage system and at present all effluent goes into the ditch at the back of the present houses and is supposed to drain away. In practice this does not happen and we have to dig the ditch out ourselves every other year as this ditch is on our farmland. Otherwise this creates a problem with rats. If more houses were built here in this village, a proper sewage system would have to be installed. A small number of houses on this site (maybe up to 10) would be more appropriate.

### Kathryn Savage

St Margaret South Elmham is a small village with 29 residential properties in the village itself at present, and approximately only 41 in the whole of the parish. We are told that this potential land for development would be for 57 properties - more than doubling the entire parish properties. The population here is mainly of the older generations, enjoying a peaceful later life way of living.

If we take as an example 2 adults in each proposed new home, the new development would more than double the existing adult population. The new development would similarly produce as many more cars in the village as the number of homes provided, and likely even more. There is no public transport from this village, so cars, bikes etc are a must. The roads around the village on all sides, are not well-built, narrow, and frequently need attention. These would need to be upgraded. This also would increase greatly with double the number of vehicles attached to the development.

Further, there is also no mains drainage/sewerage in the village at all. All properties are serviced by septic tanks. The row of eight cottages where I live uses a very large septic tank servicing the row of eight - how might drainage/sewerage be considered on a plot with 57 properties?



There is no mains gas provision in the village. Homes with gas appliances have to use caller gas tanks. Most others are all electric.

All in all, it seems to me, as a former Clerk to the Parish Council, without bias, that this proposal is a no-brainer, given the enormous amount of infrastructure that would be needed to service and maintain the development.

### **Valerie Smith**

The proposals of Waveney DC are indiscriminate and unrealistic- they do not address the actual housing need in the area, have no regard for the impact on the village nor the consequences for the infrastructure of the area generally.

1 LOCATION : St Margaret's is a totally inappropriate location for mass housing; it

1.1 is remote from centres of employment

1.2 is remote from essential services - schools, medical centres, leisure facilities

1.3 has no public transport and poor bus and train transport services from nearby towns

1.4 is accessed by only small local roads/lanes which only meet the present needs and are prone to flooding

1.5 has an under-developed infrastructure eg no gas, no mains drainage, no street lighting or paving

2 DEVELOPMENT: It is unrealistic to propose a development on a scale that would more than double the size of the village:

2.1 it would totally change the character and cohesion of the village,

2.2 it takes no account of the impact on existing services which are already fragile for example electricity (overhead supply) and water supply

2.3 it would significantly add to problems of surface drainage with a potentially increased risk of flooding

2.4 there is no evidence of significant demand for a major housing scheme in the locality and therefore the development may not achieve the Council's objective with the consequent possibility of creating second homes

NB The village has long been considered by Waveney DC to be at the limit of its sustainable size and even small developments have been rejected on these grounds - these earlier reservations are still valid.

### 3 SPECIFIC SITE PROBLEMS

3.1 Drainage is already a serious problem on this field (the reason given for it not being cropped). Water run-off would be immeasurably worsened by building, especially dense occupancy. Existing ditches were made to deal with field drainage and already flood from time to time impeding road access - they would not cope with the additional run-off caused by buildings. The site would therefore require special drainage measures to cope with additional water usage and to direct run-off to suitable water courses to avoid the risk of flooding. (It is unclear where the excess water might have to go.)

3.2 it would need either a substantial sewage treatment plant or mains drainage for the village

3.3 electricity and water supply would have to be upgraded - probably for the whole village

3.4 there is no gas

3.5 with an increase in population there would be a need to provide open spaces/ play areas

4 COST : it should be acknowledged that the cost of essential infrastructure improvement beyond the environs of the site itself (eg drainage or village access roads) would fall on Waveney DC and not the developer

### 5 GENERAL COMMENT

It is unfortunate that the consultation does not start from the question of what the needs are rather than what sites are available for building and has not given local communities enough time to take on board the need to consider the true needs for the village . The approach direct to landowners has produced only interest from those with pecuniary interests rather than a comprehensive consideration by local people. Our parish council has sadly not attended to the need to look at local planning and I fear that being presented with a part of the plan that is unsuitable will only serve to provoke rejection of all possible development.



## **Flixton, SE St Cross & St Margaret Parish Council (Susan Glazer)**

### Context of this response

This response is informed by the views of local residents who attended an Extraordinary Parish Council Meeting on 6th July 2016. Over 40 people were there out of a village total population of approximately 100 and written contributions were also received. This level of participation reflects the strength of the community and the feeling about local developments. The meeting was audio recorded. At the start an email from District Councillor David Ritchie was read saying there was no likelihood of large scale development in the villages in this area due to lack of services. Robert Walpole, the landowner who had put forward the site, also made a statement confirming he did not want or suggest 57 houses and had anticipated a very much smaller number. Nor had he been consulted or aware of the figure of 57 before publication. He stated he would not sell the land for a large scale development. An email from a resident was read out strongly opposing the suggestion of mass development in the village with detailed reasons. This email summed up the feelings of many and is reproduced below for information. There was then a lively and open discussion regarding the scale, nature, need for, history, location, environmental aspects, implications of access across common land, costs, and concerns regarding any new houses which would be considered appropriate and proportionate. Without exception the speakers alluded to the wonderful spirit and the special and highly valued sense of community and cohesion in this village which they feel is important to maintain. At the end of the meeting there was no official vote but a show of hands was taken about the preferences of residents which has informed the Parish Council response below.

Based on the outcome of local consultation, the response of the Grouped Parish Council to the suggestion of housing development in St Margaret South Elmham on site 149 is:

1) The majority of residents of St Margaret South Elmham are prepared to consider some small scale housing development provided it was sympathetic to the environment and in proportion with the size and spirit of the village. It is recognised that some appropriate development in keeping with local needs and circumstances could enrich the community and affordable houses in particular could enable local people to stay in the area. However, any developments should be gradual and incremental, carefully considered and the residents should be consulted at all stages. Where possible new houses should be on small infill sites where new residents could be more easily absorbed into the village to the benefit of all concerned. In addition there may be alternative sites within the village which could be considered for small scale housing instead of site 149.

2) However, the Grouped Parish Council and local residents are unanimously and totally opposed to large scale development in St Margaret South Elmham. It is obviously unrealistic, unsustainable and disproportionate in a small remote village. There are clearly inadequate services of all kinds to meet the needs of a high number of new residents with the sewerage being a particular concern as this village is not on mains drainage and there are already problems regarding drainage on this site. The cost to Waveney District Council for providing these services to the required standard would be exorbitant. Access to any new development in the village would be across common land which brings significant issues about permissions especially on a large scale. The suggested number of 57 houses would more than double the village and would be completely out of scale and out of keeping with the environment, and the spirit and character of the area. The many reasons why a large development would be so inappropriate are summarised in detail at the end of this letter.

3) Some residents do not want any new development at all in the village because they feel it would be detrimental to the overall local environment and too remote for new housing. It was pointed out that some years ago this village had been designated by Waveney District Council to be a 'dead village' where no new development would be possible.

4) We recognise that this local consultation is part of a much larger process and that there is a need for more housing in Waveney. However we consider that the right place for mass development is in the towns because of the much greater access to essential services.

### Comments on the process of consultation

We consider that the process of publishing a potential number of houses for sites according to a blanket



formula and without knowledge of the landowner or others is insensitive and could be damaging to both local relationships and to the planning process overall. For St Margaret South Elmham the figure of 57 was given a) without paying any apparent regard to the potential impact on the village, the residents and the environment b) without supporting evidence that large scale development could be possible or sustainable on the site and c) without the knowledge of the landowner. This could have caused significant discord and divisions between local residents for instance if people believed that the landowner supported the idea of 57 houses. It could also have been self defeating to the aims of WDC by creating conditions which then spoiled the chances of finding sites which are suitable and acceptable for development in the village and surrounding area. We hope very much that in future Waveney District Council will consider a consultation process, at whatever stage, which respects local people and local impact and need.

We hope these views from the Grouped Parish Council will contribute to the development of the final New Waveney Local Plan.

## Appendix

The email from a resident of St Margaret South Elmham which sums up the reasons for opposing large scale development in the village. See above

The proposals of Waveney DC are indiscriminate and unrealistic- they do not address the actual housing need in the area, have no regard for the impact on the village nor the consequences for the infrastructure of the area generally.

1 LOCATION : St Margaret's is a totally inappropriate location for mass housing; it

1.1 is remote from centres of employment

1.2 is remote from essential services - schools, medical centres, leisure facilities

1.3 has no public transport and poor bus and train transport services from nearby towns

1.4 is accessed by only small local roads/lanes which only meet the present needs and are prone to flooding

1.5 has an under-developed infrastructure eg no gas, no mains drainage, no street lighting or paving

1.6 access to any new development would be across common land which would bring difficulties re permission especially on a large scale

2 DEVELOPMENT: It is unrealistic to propose a development on a scale that would more than double the size of the village:

2.1 it would totally change the character and cohesion of the village,

2.2 it takes no account of the impact on existing services which are already fragile for example electricity (overhead supply) and water supply

2.3 it would significantly add to problems of surface drainage with a potentially increased risk of flooding

2.4 there is no evidence of significant demand for a major housing scheme in the locality and therefore the development may not achieve the Council's objective with the consequent possibility of creating second homes

NB The village has long been considered by Waveney DC to be at the limit of its sustainable size and even small developments have been rejected on these grounds - these earlier reservations are still valid.

## 3 SPECIFIC SITE PROBLEMS

3.1 Drainage is already a serious problem on this field (the reason given for it not being cropped). Water run-off would be immeasurably worsened by building, especially dense occupancy. Existing ditches were made to deal with field drainage and already flood from time to time impeding road access - they would not cope with the additional run-off caused by buildings. The site would therefore require special drainage measures to cope with additional water usage and to direct run-off to suitable water courses to avoid the risk of flooding. (It is unclear where the excess water might have to go.)

3.2 it would need either a substantial sewage treatment plant or mains drainage for the village

3.3 electricity and water supply would have to be upgraded - probably for the whole village

3.4 there is no gas



3.5 with an increase in population there would be a need to provide open spaces/ play areas

4 COST : it should be acknowledged that the cost of essential infrastructure improvement beyond the environs of the site itself (eg drainage or village access roads) would fall on Waveney DC and not the developer

#### 5 GENERAL COMMENT

It is disappointing that Waveney DC have not conducted this search for building land through parish councils who would have brought local knowledge to bear in what could be considered practicable and take account of the local housing needs. The approach taken by Waveney makes a nonsense of the planning process and is unlikely to fulfil the goal of building much-needed housing because it will have spoiled the chances of finding more sensible small scale developments that are more achievable in rural locations.

#### **Historic England (Debbie Mack)**

Proximity to Greenside Farmhouse to south west and Post Office Stores Thimble Cottage to north west, both grade II listed and scheduled Monument Moated site to east. Potential impact on setting of listed buildings and on Scheduled Monument.

### **150 - The Street, St James South Elmham**

#### **Michael Fontenoy**

St James is a village with poor transport links, it has been said that you find it when you are lost. It is a mainly agricultural village still and therefore has lots of large agricultural vehicular movements on lanes which they just fit into. Public transport is non-existent, a community transport bus provides a service to a different town once each day and is no use for commuting. There are no schools, shops, pubs or other typical infrastructure all meaning that everyone in the village drives somewhere to do anything. Those who do not or cannot drive are trapped.

Superfast Broadband only came to the village because people in the village paid for the connections instead of waiting years. Power is not assured with regular outages in winter, and low amperage is a occurrence. Low water pressure is another factor to take consideration.

The number of houses suggested for the sites in St James would double the size of the village and the council will need to seriously consider how to overcome elements described b.

The existing housing stock is not densely situated and the number of houses would change the character of the village.

#### **Janet Holden**

St James South Elmham does not have the infrastructure to increase in size, there are no buses or transport that runs on a regular basis, the nearest schools are a distance away for both primary and secondary pupils. I am concerned that increasing the size of the village, where we don't have mains drainage, where power supply is often interrupted and where residents had to pay for BT to install superfast broadband will add further pressure to an overstretched infrastructure. The development will increase traffic through the village on roads that are falling apart and poorly maintained. The fact that there is no public transport and that new developments often are occupied by families with children will mean that school run traffic will cause significant road safety concerns to pedestrians especially because there are no pavements through the village



and the road is already heavily used by agricultural vehicles . In addition there are no facilities in the village, no shop no pub, no opportunities for young people's leisure , which means that the development will just result in people simply living in the location with no opportunity to support and build the community. 93 homes will double the size of the village, will detract from the historical ribbon structure of the village, spoil the uninterrupted views across a unique and significant landscape and have a detrimental effect on wildlife in the area which is home to barn owls, larger mammals and important colonies of amphibians. Additionally the roads in and out of the village are very narrow with no passing places and the nearest shops are either in Bungay or Halesworth over 6 miles away. The proposed land is arable land adjacent to pig farms which I'm sure new residents will not appreciate. Finally this is a rural area and filling the area with high density suburban housing will ruin the look and feel of the surroundings and I believe that such a development does not fit in with Waveney councils current planning guidance.

### **Ruth Key**

On behalf of my sisters and myself, I submitted a proposal for two areas of potential development land in St James South Elmham, sites referenced as 143 and 150 in your consultation document. We were rather surprised to see in your document that these have been identified as having possible room for 33 and 93 houses respectively, including a care home on the latter site.

We recognise that these housing figures are based on the standard densities you use for calculating a site's potential, but obviously in a small village such as St James, housing groupings of this size would create an over-dominant development. If these areas are included in your final plan we would therefore seek to work with Waveney Planning Department to create a development suitable for the village.

### **Historic England (Debbie Mack)**

Abbey Farmhouse and Barn, The Thatched Cottage, Brook Cottages, all grade II listed. Potential impact upon setting of listed buildings.

### **St James South Elmham Parish Meeting (Mary Henry)**

Your Help Plan Our Future booklet shows (p 53) that two sites in St James South Elmham have been put forward by a developer/landowner as having potential for housing development and being suitable for inclusion in the local plan. We have the following comments about these two sites:

1. The maps show two large areas fronting The Street and St James Lane with capacity for 93 and 33 homes respectively – 126 in total. Having spoken to the landowner, the origin of these numbers is unknown, and it is not believed they formed part of the proposition made in response to this consultation. It is thought they were added by WDC.
2. As noted above, the village currently has 88 homes. This development would increase the size of the village by about 150%. We believe this is wholly disproportionate to the size of the village.
3. The development would also represent 50 times as many houses as would be a proportionate increase for the village under the scenario examined under Q7 above and be inconsistent with a housing strategy based on that approach.
4. It would imply a population rise from 205 to almost 500 and be significantly beyond the available infrastructure's ability to cope and beyond the scope of the current amenities. The communal village facilities are limited to a hall, a church, a village orchard and small wood.
5. The village is agricultural at heart and set in a deeply rural area. There is no likelihood of local employment needs generating housing demand of this scale.
6. The nature of the village is reflected in its structure and character, with agriculture coming right into the heart of the village. Development on this scale and on these sites would remove that distinctive feature and destroy the nature and cohesion of the community.



7. We do believe that some small growth in housing in the village, fitting with its size and character, on appropriate sites, and consistent with the rural area percentage as noted in Q7, above, could be considered.

In summary, the proposed St James developments are inappropriate sites, massively disproportionate in scale, unnecessary in the context of any of the Waveney development scenarios, unsustainable by the existing infrastructure, and damaging to the structure, style and character of the village. Small levels of additional development (up to 1 – 2 homes per year) might be sustainable and useful.

I hope these comments and observations will be useful. Should you have any questions about the content of this response do not hesitate to contact me.

### **151 - Town Farm 1, Land off Harrisons Lane, Halesworth**

#### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

#### **Tony L**

If more housing than that provided by the 'Tesco Site' on Saxons Way and the Halesworth Campus/Cutlers Hill/Patrick Stead proposed development is needed this is probably one of the better sites in Halesworth but is it too far from town encouraging more traffic.

#### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

#### **Edward Barnaby Milburn**

The land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ The land is remote from the town centre and residential development would exacerbate car journeys.
- ▶ It forms part of the Strategic Gap (Policy DM 28 Adopted January 2011) and Open Breaks to prevent coalescence of Halesworth and Holton and maintain the character of fields and ancient hedgerows that separate the two settlements.
- ▶ The land is only accessible from Harrison's Lane - an attractive but narrow country lane with poor connection to the primary road network and unsuited to increased traffic.



**G H Thomas**

This comment doesn't just apply to the site 151. It includes 65/152/153/154/155/161. All these sites are adjacent to one another and if they are all given the go ahead to build the housing units they have asked for that will mean 525 new homes in that one very large zone. At an average of two people per unit means 1,050 people. That on it's own causes a problem with road congestion but also potential need for more schools and another doctors surgery, let alone more shops and other facilities. If that is then put with site 102 which is designated for business, this may have the benefit of creating employment for the area, but again congestion on the roads

**Halesworth Town Council (N Rees)**

The sites adjacent to 161 - 151, 152, 153 should be considered as potentially adding to a sport/ recreational facility.

**Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to south. Potential impact upon setting of Listed Building.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This should be designated as aspirational sport and recreation facilities

**152 - Town Farm 2, Land off Harrison's Lane, Halesworth / Holton**

**Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

**Tony L**

Should not be considered for development as will impact on the strategic gap between Halesworth & Holton

**Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.



**Edward Barnaby Milburn**

This land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ The land is remote from the town centre and residential development would exacerbate car journeys.
- ▶ It forms part of the Strategic Gap (Policy DM 28 Adopted January 2011) and Open Breaks to prevent coalescence of Halesworth and Holton and maintain the character of fields and ancient hedgerows that separate the two settlements.
- ▶ The land adjoins or includes the distinctive landscape feature of a 'green lane' or 'loke' with high amenity value and much used and appreciated which should be conserved.
- ▶ The land is only accessible from Harrison's Lane - an attractive but narrow country lane with poor connection to the primary road network and unsuited to increased traffic.

**Halesworth Town Council (N Rees)**

The sites adjacent to 161 - 151, 152, 153 should be considered as potentially adding to a sport/ recreational facility.

**Halesworth Town Council (N Rees)**

Site 152 is on the border of Holton and Halesworth. 165 houses are far too many as proposal in this area and potentially encroach on the strategic gap.

**Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to south. Potential impact upon setting of Listed Building.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

The western part should be designated as aspirational sport and recreation facilities and the eastern part designated to preserve the non-housing strategic gap between Halesworth and Holton as in the WDC Green Infrastructure Strategy document 2015.

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**153 - Town Farm 3, Land off Harrisons Lane, Halesworth**

**Louis Baum**

[Saved in Chapel House as Objections to Waveney Development Plan 01 06 16]

Having only by chance come across the Waveney District Council's information re a consultation process for new developments between Halesworth and Holton, it is most surprising to us that this information was not circulated in Loam Pit Lane, which is surrounded by potential development plots, especially in the upper, northern end. This failure of consultation should on its own invalidate any proposals WDC might consider for development of this land for housing.



Further, considering WDC's own intentions to keep "strategic gaps" and "prevent coalescence and retain separate identities between Halesworth and Holton", and the assertion that "developments will not be permitted where it would prejudice the aims of maintaining the open character of strategic gaps and open breaks as identified on the proposal map", these locations, in particular 65, seem to be explicitly ruled out for further development. Why, therefore, are they up for discussion?

Even if this were not the case, problems of access and provision of services to these locations make them less desirable areas for development by comparison with other open spaces in the area northwest of Halesworth.

For these reasons we believe that WDC and Halesworth Town Council should explicitly rule out these locations as sites for future housing development.

### **Paul Cope**

Other sites - 65, 161, 153 etc would build within Halesworth.

### **Tony L**

Assumed that this was already part of the planned Dairy Hill development to improve Cutler's Hill surgery and replace Patrick Stead facilities and if so, should progress.

### **Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

### **Edward Barnaby Milburn**

I own a part of this land.

I have not been notified of any prospect of potential development of the land.

The land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ It forms part of the Strategic Gap (Policy DM 28 Adopted January 2011) and Open Breaks to prevent coalescence of Halesworth and Holton and maintain the open character of the high land and fields and hedgerows that separate the two settlements.
- ▶ There is no access to the land except through the Town Farm chick-rearing farmyard which is closed to vehicles; this in turn is only accessible from Harrison's Lane - an attractive but narrow country lane with poor connection to the primary road network and unsuited to increased traffic. Loam Pit Lane, the upper part of which borders the east side of the land is an unmade single vehicle width farm track which terminates at Town Farm; the surfaced lower part of Loam Pit Lane is also narrow and congested as it serves several houses on each side and the allotments. Furthermore the junction at Holton Road is very awkward with poor sight lines under



the railway bridge and totally unsuited to increased burden of traffic arising from development.

- ▶ Development of this land would adversely affect the setting of a Listed Building.
- ▶ The steeply rising nature of the land forms an important feature and backdrop to the principal approach to Halesworth down London Road; development of this site would be conspicuous and completely alter and harm the landscape setting of the Town.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Halesworth Town Council (N Rees)**

The sites adjacent to 161 - 151, 152, 153 should be considered as potentially adding to a sport/ recreational facility.<sup>1</sup>

#### **Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to east. Potential impact upon setting of Listed Building.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 153;155 both abut the proposed redevelopment of the existing sports field Site161 held in trust for the community by Halesworth Playing Fields Association. These sites could be linked to this proposed development

### **154 - Town Farm 4, Land off Harrisons Lane, Holton**

#### **Anonymous**

Water flooding Holton village. No method of getting water away. Holton Street floods in winter after heavy rain/thawing snow. Has never improved in last 30 years.

#### **Tony L**

Should not be considered for development as would impact on the strategic gap between Halesworth & Holton.

#### **John Lavery**



These comments apply to ALL the Town Farm sites i.e. 151, 152, 153, & 155! Along with site 65 these fields remain the only points of separation of Holton from Halesworth. If the town farm sites are lost to development Holton is effectively absorbed into Greater Halesworth. So, from being a pleasant village partly surrounded by fields, Holton becomes part of Halesworth's nondescript urban sprawl. This isn't desirable for either community.

**Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

**Edward Barnaby Milburn**

This land is not suitable for development for the following reasons:-

- ▶ It is productive agricultural land.
- ▶ The land is remote from the town centre and residential development would exacerbate car journeys.
- ▶ It forms part of the Strategic Gap (Policy 28 Adopted January 2011) and Open Breaks to prevent coalescence of Halesworth and Holton and maintain the character of fields and ancient hedgerows that separate the two settlements.
- ▶ the land adjoins or includes the distinctive landscape feature of a 'green lane' or 'loke' with high amenity value and much used and appreciated which should be conserved.
- ▶ There is no access to the land except through the Town Farm chick-rearing farmyard which is closed to vehicles; this in turn is only accessible from Harrison's Lane - an attractive but narrow country lane with poor connection to the primary road network and unsuited to increased traffic.

**Halesworth Town Council (N Rees)**

Site 154 is isolated and as it is adjacent to the envisaged sports development perhaps it should be considered as part of that.

**Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to west and Hill Farmhouse, grade II listed building to south. Potential impact upon setting of Listed Buildings.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 154 is difficult to access unless part of site 65 has limited development.

**155 - Town Farm 5, Land off Harrison's Lane, Halesworth**



**Louis Baum**

[Saved in Chapel House as Objections to Waveney Development Plan 01 06 16]

Having only by chance come across the Waveney District Council's information re a consultation process for new developments between Halesworth and Holton, it is most surprising to us that this information was not circulated in Loam Pit Lane, which is surrounded by potential development plots, especially in the upper, northern end. This failure of consultation should on its own invalidate any proposals WDC might consider for development of this land for housing.

Further, considering WDC's own intentions to keep "strategic gaps" and "prevent coalescence and retain separate identities between Halesworth and Holton", and the assertion that "developments will not be permitted where it would prejudice the aims of maintaining the open character of strategic gaps and open breaks as identified on the proposal map", these locations, in particular 65, seem to be explicitly ruled out for further development. Why, therefore, are they up for discussion?

Even if this were not the case, problems of access and provision of services to these locations make them less desirable areas for development by comparison with other open spaces in the area northwest of Halesworth.

For these reasons we believe that WDC and Halesworth Town Council should explicitly rule out these locations as sites for future housing development.

**Edward Barnaby Milburn**

The sites further north 106,140,141 & 122 are rather remote from the town centre but would provide additional housing capacity without harmful impact on the character of the town.

There would thus be no need to develop the Strategic Gap sites 65 and 151 - 155 or the western extension sites 115 and 116. The effect of the additional central area homes would improve the sustainability of the retail core and town centre amenities - and the town would be more compact, complete and animated as a result.

**Edward Barnaby Milburn**

This land adjoins my property.

I have not received any notification of a proposal for residential development.

The land is unsuitable for residential development for the following reasons:-

- ▶ There is no adequate vehicular access. The land is only accessible from Loam Pit Lane which is a narrow un-made single lane farm track closed at Town Farm; the surfaced lower part of the lane is extremely congested (see comment on site 153 above) and totally unsuitable as access to any further development.
- ▶ The land forms part of the Strategic Gap (Policy DM28 Adopted January 2011).
- ▶ The land is a rare survival of an enclosed paddock bounded by ancient hedgerows and trees (mainly oaks) and is of high landscape and amenity value.
- ▶ The land is Set-aside and subsidised for wild-life and conservation.
- ▶ This land forms an important backdrop to the peaceful setting and high landscape quality of the Town



Cemetery.

#### **Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### **Historic England (Debbie Mack)**

Proximity to Town Farmhouse, grade II listed building to north and Hill Farmhouse grade II listed to south. Potential impact upon setting of Listed Buildings.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

Site 153;155 both abut the proposed redevelopment of the existing sports field Site161 held in trust for the community by Halesworth Playing Fields Association. These sites could be linked to this proposed development

### **156 - West of A145 London Road, Beccles**

#### **Nicky Elliott**

I have misgivings about potential development of this site, along with sites 24, 145 and 43 as there is no limit to development to the south and west of this area. The sites further east are preferable, as they are bounded by the Southern Relief Road to the south, and the A 145 to the west.

#### **James Harvey**

Hello,

We currently live on London Rd bordering the proposed new developments. This would significantly reduce our quality of peace and privacy. It could well reduce the value of our property. We are at present taking legal action against Essex and Suffolk Water for not informing us of 3 significant TRUNK pipes running through our garden. The source being the proposed site behind us. We have asked in the past if we could buy additional land to extend our garden. We hope we will have first rights if the development goes ahead. This development will significantly effect our lives.

Thank you

James and Helena Harvey

**James Harvey**



Hello,

Following on from earlier comments, we hope the proposed Bypass will be built with all the new housing developments. Beccles cannot cope with the traffic now!, Additionally, as council tax payers why weren't these plans made more public earlier as they directly effect us?

Thank you

James and Helena Harvey

**andy house**

this seems a natural site for expansion after site 43. housing density is too high as proposed. additional health care and facilities required in beccles to meet this development

**Paul Leman**

This site is not suitable for housing development. It will further contribute to already congested town infrastructure & stretched local facilities.

Any development should be well outside the town, with its own facilities & with good road lincs to main roads avoiding Beccles.

**Councillor Caroline Topping**

As I said earlier, I am not against Beccles having new affordable homes and bungalows however these need to be built in manageable sizes around the periphery of the town and brown field sites such as plot 16 (24 homes) in the town centre and plots 156 (260 homes), 43 (40 homes), 108 (49 homes)all along a current main road, where there is currently little development and not feeding into the current traffic hot spots which is Ingate Street/Lowestoft Road.

**Beccles Town Council (C Boyne)**

Whilst the council appreciate the need for development in the area over the next twenty years, it must be handled with great care as the infrastructure in Beccles is at breaking point now, especially the Health Centre. With this in mind, it is felt that any housing development should be restricted to the area to the South West on one or two of the sites numbered 24,43, 108, 145 and 156, as this makes the best use of the existing and planned road infrastructure. However, this area would require a new primary school and a convenience store and other associated infrastructure to service any expansion. In addition, the two small sites in Beccles, numbers 1 and 16 and site number 60 in Worlingham could also be included as sites for development.

**Broads Authority (Natalie Beal)**

Group of sites to the south of Beccles – As they are on rising ground, any development proposals would need



to be assessed for potential landscape and visual impacts on the Broads area.

**Historic England (Debbie Mack)**

Proximity to Beccles Conservation Area

**Resident (Mark Beglarian)**

This site adds nothing to Beccles except to increase traffic and stretch services and facilities which are already under severe pressure.

### 157 - West of Redisham Road, Brampton with Stoven

**Stephen Fuller**

I wish to object to the proposed development of 90 homes West of Redisham Road, Redisham (Site No. 157).

Redisham is a dispersed settlement where development proposals should be considered very carefully; estate development would totally overwhelm it.

My reasons for objection are:

- ▶ Complete lack of local infrastructure
  - o No local shop – the closest shop is 2.5 miles away in Westhall. The current proprietor is in his 90's and the shop is likely to close on his retirement.
  - o Unsuitable country lanes – there's no pedestrian pavement and several dangerous blind bends on adjoining roads. There were four accidents in Redisham last year, therefore any increase in traffic will increase the risk of more accidents
  - o Parts of Redisham Road are single lane and totally unsuitable for our modern 21st Century world of regular internet deliveries via large vans and lorries.
  - o Access to the train station by foot is highly dangerous down unlit, narrow, country lanes with no pavements. Onsite parking is extremely limited.
  - o No mains gas – new houses would have to use oil heating which is not environmentally friendly.
- ▶ Loss of high quality agricultural land and potentially trees. The Government has communicated through various types of media that agricultural land is essential for food production.
- ▶ Lack of local employment – the nearest areas of major employment are Norwich & Ipswich
- ▶ There are better alternative sites available – priority should be given to "brown field" sites rather than "green field" sites.

**Environment Agency (-)**



We have done a high level review of the proposed sites and identified the following environmental constraints:

**Source Protection Zone 3**

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

**Historic England (Debbie Mack)**

Shingle Hall, grade II listed to south west. Potential impact on setting of listed building.

**Redisham Parish Meeting (Michael Parry)**

The suggestion is that this could accommodate up to 90 units. This site is actually in the Brampton area rather than Redisham, but the increase in traffic through Redisham could be considerable and we already have problems. We recommend that this site should only be developed if all the infrastructure considerations are addressed simultaneously. The routes to the local schools for instance (Halesworth Road and Beccles Road) would need significant improvement.

Both sites would also present a problem for sewage, as we understand that the present system is at its capacity.

**158 - Wood Cottage, London Road, Brampton with Stoven**

**Historic England (Debbie Mack)**

Manor Farmhouse grade II listed to south west. Potential impact upon setting of listed building.

**Suffolk Wildlife Trust (James Meyer)**

Site 158 is adjacent to Stoven Wood CWS. We therefore consider that this site should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on the CWS.

**159 - West of A144 opposite Triple Plea, Halesworth / Spexhall**

**Halesworth Town Council (N Rees)**

Site 159 very small site and adjacent to Spexhall. HTC and Spexhall would need to look at this together.

**The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This site could be included in small-scale housing in conjunction with any industrial site allocation north of



Halesworth

### 160 - Basley Ground, Bramfield Road, Halesworth

#### Historic England (Debbie Mack)

Proximity to South Lodge, grade II listed. Potential impact on setting of listed building.

#### Suffolk Wildlife Trust (James Meyer)

Based on aerial photographs, sites 14; 76; 86; and 160 may contain habitats and species of conservation value. We therefore consider that these sites should not be allocated for development unless it can be demonstrated that this would not result in an adverse impact on any existing ecological value that they have.

#### The Halesworth & Blyth Valley Partnership (Ezra Leverett)

recent development adjoining this site has proved successful with minimum impact. Limited development could be achieved on this site and provide resources towards the much-needed planned expansion of sports facilities on the old Middle School site

### 161 - Dairy Hill, Halesworth

#### Paul Cope

Other sites - 65, 161, 153 etc would build within Halesworth.

#### Tony L

I assumed that this plot and 153 were part of the planned improvement to the health centre and replacement for Patrick Stead Hospital facilities which should go ahead.

#### John Lavery

This is a site where some sensible thought has already gone in the proposed development. The development of the site for a Medical centre would be a boon in an area that is too far from many medical services, especially given the poor public transport locally.

#### Environment Agency (-)

We have done a high level review of the proposed sites and identified the following environmental constraints:



#### Source Protection Zone 2

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

#### Halesworth Town Council (N Rees)

Sites 161, the Dairy Hill site is currently part of a proposed development of health and sporting facilities. HTC strongly supports this development. Sporting facilities are greatly needed by Halesworth and the local parishes, particularly those south of the Town. Adjacent to Site 160 a small development has been very successful. The possibility of developing Site 161 to enable sporting/ health facilities could be explored further.

#### Historic England (Debbie Mack)

Proximity to Town Farmhouse, grade II listed building to east. Potential impact upon setting of Listed Building.

#### The Halesworth & Blyth Valley Partnership (Ezra Leverett)

Site 161 is the proposed site for Health, Welfare and independent living and should be strongly supported.

### 162 - South of Wissett Road, Halesworth

#### Halesworth Town Council (N Rees)

Site 162 is a very small and would provide few extra houses. Previously used by the guides, the development of this site would have minimum impact of the Wissett Road and complete the area.

#### Historic England (Debbie Mack)

Close to 15, 16, 17 and 18 Rectory Street, all grade II listed. Potential impact on setting of Listed Buildings.

#### The Halesworth & Blyth Valley Partnership (Ezra Leverett)

This small development would tidy up this site previously used by the Halesworth Guides, with minimum impact on Wissett Road.

### 163 - West of Roman Way, Halesworth

#### Edward Barnaby Milburn

There appears to be a significant area of land to the west of this site and within the existing town limits.



This appears to extend to about ten hectares and could therefore accommodate a significant number of residential units.

Residential development here would be inconspicuous and enjoy good access along Chediston Street to the Market Place and town centre.

#### **Halesworth Town Council (N Rees)**

Site 163 is opposite the Church Farm Estate and would complete that area as it is not too big. There is easy access to the town and being on the outskirts of the town, good links to major roads.

#### **The Halesworth & Blyth Valley Partnership (Ezra Leverett)**

This site has good infrastructure along Roman Way, easy access to the Town centre and would seem to be a natural addition to the current, well planned development east of the Town.

### **164 - Land west of Northern Spine Road/north of Pleasurewood Farm, Oulton / Corton**

#### **Barrington Blythe**

We have only just had the bypass road opened which looks to have been a great success and a relief to traffic and I note that plot 164 development ( whatever it is) will surely add significant traffic to the area. I then ask what was the point for the bypass?

#### **Terry Gooding**

I always knew that the new road wasn't put into help with traffic problems - it was to allow access to the Park Hill area for development - very predictable.

#### **Brian Jones**

Totally object to the development of this site as it is against all the statements from Suffolk and Waveney on all previous planning applications that they must protect the rural Northern approach to Lowestoft. Green belt areas must be protected from over development.

#### **CM Woodhouse**

I am writing to oppose the proposed plans for future land for housing development in the Blundeston Road area of Corton – sites 4, 164, 165. We have only just been made aware of these plans!

I object on environmental grounds and totally oppose more of our valuable farmland being lost. With regard to climate change carbon is stored in soil and not in concrete. This will have a major impact on wildlife. My neighbour has reported seeing 30 different species of birds in his garden. I am also concerned about the danger of flooding as a result of more concrete being laid, especially as we seem to be having more erratic weather patterns and exceptionally heavy rain. Where will all this additional water go?



If more houses are built how will the local schools, doctors surgeries cope? We have already lost Oulton surgery and there is a difficulty finding more G.Ps.

Surely in Lowestoft there are many empty sites and also couldn't the Council purchase properties that have been empty and neglected.

#### **Historic England (Debbie Mack)**

Adjacent to Parkhill Hotel grade II listed building. Potential impact upon setting of Listed building.

#### **LYRA ( Lowestoft &Yarmouth Regional Astronomers ) (Jim Slight)**

The agricultural land on the boundary of North Lowestoft ( area 164, 165 and 166 ) should be retained and included in a Green Belt Policy.

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

164 Land West of Northern Spine Road/North of Pleasurewood Farm

We do not consider this site suitable for development due to poor access and egress road infrastructure.

### **165 - Land west of A12 Yarmouth Road, Corton**

#### **Barrington Blythe**

These potential developments are encircling Corton village; with regards to the village we already suffer from heavy road congestion

and parking problems causing road congestion in The Street. We live in a village by choice wishing to town centre or housing estate living and to avoid heavy traffic etc, in viewing these two development prospects it is difficult to see how Corton village would cope with the additional burden of people and traffic without significant infrastructure and amenities improvements which I am sure will come at a great cost to the taxpayer and destroy a small village community.

This is a rural community and additional Industrial and or housing in the area requires much thought and planning. Given the size of our village and the current road congestion problems I would be opposed to any new development.

Also, I do not understand Councils' attitudes across the country toward the possibility and ease of bulldozing our countryside, rural or greenbelt areas when there are plenty of other options? Instead of ripping up what little countryside we have left why does our council not look at or consider the redevelopment of redundant or derelict sites within our town boundaries? A couple of places for example, the old Boulton and Paul site (I think the last owners were JeldWen), the Sanyo factory site, infact all along the south side of the river in Lowestoft also where the Zephyr Cams factory used to be on the South Lowestoft Industrial Estate. These places have left the town looking very desolate and an absolute eyesore!

#### **Brian Jones**



Totally object to the development of this site and site numbers 164 and 166 as it is against all the statements from Suffolk and Waveney on all previous planning applications that they must protect the rural Northern approach to Lowestoft. Green belt areas must be protected from over development.

**Darren McIntyre**

I feel the council should be considering the land on both sides of the dual carriageway between Lowestoft and Yarmouth there is large clear areas for possible 1000's of houses and you could easily build slip roads on to the dual carriageway Lowestoft new road system and hopefully the third crossing so the increase in car use and services well not over load the ageing infrastructure if you added large numbers of houses on to existing estate / developments with in the town.

Thanks for your time in reading my view and hope we can keep our town great in to the future

**P Mounser**

It would appear, alarmingly so, that at some time in the not too distant future to make Blundeston into part of Lowestoft and Corton through the huge green field development at Blundeston Rd (165). Villages should remain villages and not become swallowed up into the town, or made a town as has happened to Carlton Colville – some small in-filling areas allowed but not massive green field developments. Where is the employment coming from to sustain the number of houses that could be built.

**Gary Shilling**

Another massive unattractive poorly designed estate, should be built away from surrounding villages as it detracts from the appeal of such.

**CM Woodhouse**

I am writing to oppose the proposed plans for future land for housing development in the Blundeston Road area of Corton – sites 4, 164, 165. We have only just been made aware of these plans!

I object on environmental grounds and totally oppose more of our valuable farmland being lost. With regard to climate change carbon is stored in soil and not in concrete. This will have a major impact on wildlife. My neighbour has reported seeing 30 different species of birds in his garden. I am also concerned about the danger of flooding as a result of more concrete being laid, especially as we seem to be having more erratic weather patterns and exceptionally heavy rain. Where will all this additional water go?

If more houses are built how will the local schools, doctors surgeries cope? We have already lost Oulton surgery and there is a difficulty finding more G.Ps.

Surely in Lowestoft there are many empty sites and also couldn't the Council purchase properties that have been empty and neglected.

**Corton parish council (Gill Armstrong)**

Access to the area is difficult as the A12 is a very fast, busy stretch of road, so adding another junction would make it extremely dangerous, the surrounding country roads are narrow and already busy. These proposals would more than double the size of the village



Many people live in the area because it is a village with a fairly low crime rate, increasing it massively can only be a bad thing. I agree that some housing is required for local, young people, not second home buyers but even if affordable housing is built, it usually gets sold on to second home owners or landlords, then we are back to square one, needing more housing. How would access, infrastructure, water, power, drainage, etc be dealt with? The water system is already struggling with low power throughout the village

#### **Historic England (Debbie Mack)**

White House Farm House grade II listed to north east of site. Potential impact upon setting of listed building.

#### **LYRA ( Lowestoft & Yarmouth Regional Astronomers ) (Jim Slight)**

The agricultural land on the boundary of North Lowestoft ( area 164, 165 and 166 ) should be retained and included in a Green Belt Policy.

#### **M J Edwards & Partners (Chris Edwards)**

Object to this site due to it being well outside the building envelop of Corton village and to far into the strategic gap.

#### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
- ▶ 72 - Land north of Lowestoft Road, Beccles RUFC Common Lane
- ▶ 102 - Land south of Sparrowhawk Road
- ▶ 13 - Fairview Farm, Norwich Road
- ▶ 30 - Land adjacent to Elms Lane

National Grid Gas Distribution would like to take this opportunity to advise prospective land developers and the local authority of the following:

Crossing of assets: Construction traffic should only cross the pipeline at locations agreed with National Grid. To facilitate these crossings protection or diversion may be required; depending on site condition and pipe parameters.

Cable Crossings: For all assets, the contractor / developer will need to consider the clearance and necessary protection measures. The crossing must be perpendicular to the asset. The crossing may require a deed of consent to be agreed prior to work commencing.

Piling: No piling should take place within 15m of gas distribution assets without prior agreement from a National Grid Representative.

Pipeline Safety: National Grid will need to ensure that access to the pipelines is maintained during and after construction.

Our HP/IP pipelines are normally buried to a depth cover of 1.1 metres, however; actual depth and position



must be confirmed on site by trial hole investigation to be monitored by a National Grid representative. Ground cover above gas distribution mains should not be reduced or increased. Our MP/LP mains will not be as deep as the pipelines.

A National Grid representative may be required to monitor any excavations or any embankment or dredging works within 3 metres of a HP/IP pipeline or within 10 metres of an Above Ground Installations (AGI). Monitoring of works in relation to MP/LP assets may be required by a National Grid representative. National Grid steel pipelines are cathodically protected to prevent corrosion to the pipeline. For further information please refer to SSW/22 (see further advice section below).

If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

### Appendices - National Grid Assets

Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)

### Oulton Parish Council (Carolyn Gosling)

- Sites not suitable for development:

165 Land west of A12 Gt Yarmouth

We do not consider this site suitable for development due to poor access and egress road infrastructure.

## 166 - Land east of A12 Yarmouth Road, Corton

### Anonymous

166 as it has immediate access to A12 and could support housing and industry.

### Barrington Blythe

These potential developments are encircling Corton village; with regards to the village we already suffer from heavy road congestion

and parking problems causing road congestion in The Street. We live in a village by choice wishing to town centre or housing estate living and to avoid heavy traffic etc, in viewing these two development prospects it is difficult to see how Corton village would cope with the additional burden of people and traffic without significant infrastructure and amenities improvements which I am sure will come at a great cost to the taxpayer and destroy a small village community.

This is a rural community and additional Industrial and or housing in the area requires much thought and planning. Given the size of our village and the current road congestion problems I would be opposed to any new development.

Also, I do not understand Councils' attitudes across the country toward the possibility and ease of bulldozing



our countryside, rural or greenbelt areas when there are plenty of other options? Instead of ripping up what little countryside we have left why does our council not look at or consider the redevelopment of redundant or derelict sites within our town boundaries? A couple of places for example, the old Boulton and Paul site (I think the last owners were JeldWen), the Sanyo factory site, infact all along the south side of the river in Lowestoft also where the Zephyr Cams factory used to be on the South Lowestoft Industrial Estate. These places have left the town looking very desolate and an absolute eyesore!

**Brian Jones**

Totally object to the development of this site as it is against all the statements from Suffolk and Waveney on all previous planning applications that they must protect the rural Northern approach to Lowestoft. Green belt areas must be protected from over development.

**Adam Skinner**

I feel we already have enough large scale developments in Lowestoft

I'd like to see this land left as it is

**Corton parish council (Gill Armstrong)**

Access to the area is difficult as the A12 is a very fast, busy stretch of road, so adding another junction would make it extremely dangerous, the surrounding country roads are narrow and already busy. These proposals would more than double the size of the village

Many people live in the area because it is a village with a fairly low crime rate, increasing it massively can only be a bad thing. I agree that some housing is required for local, young people, not second home buyers but even if affordable housing is built, it usually gets sold on to second home owners or landlords, then we are back to square one, needing more housing. How would access, infrastructure, water, power, drainage, etc be dealt with? The water system is already struggling with low power throughout the village

**Historic England (Debbie Mack)**

White House Farm House grade II listed to north east of site. Potential impact upon setting of listed building.

**LYRA ( Lowestoft &Yarmouth Regional Astronomers ) (Jim Slight)**

The agricultural land on the boundary of North Lowestoft ( area 164, 165 and 166 ) should be retained and included in a Green Belt Policy.

**M J Edwards & Partners (Chris Edwards)**

**Object** to this site due to its location within the strategic gap between Lowestoft and Great Yarmouth. The proposed 50 hectare site would potentially make Corton village a sprawled out habitat which would have a negative effect on the centre of the village where there are currently shops and business's. It also takes away a large portion of grade two arable land north of Corton and also effects an established livery yard business



situated on Corton Long Lane which in turn gives employment to several people and companies in the Waveney area.

### **National Grid (Robert Deanwood)**

The following sites have been identified as being crossed by or within close proximity to IP/ HP apparatus:

- ▶ 166 - Land east of A12 Yarmouth Road
- ▶ 165 - Land west of A12 Yarmouth Road
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If you require any further information in relation to the above please contact National Grid's Plant Protection team via the email address at the top of this letter.

### **Appendices - National Grid Assets**

Please find attached in:

- ▶ Appendix 1 provides maps of the sites referenced above in relation to the affected National Grid Gas



Distribution (Intermediate Pressure /High Pressure) assets outlined above.

(map enclosed)

#### **Oulton Parish Council (Carolyn Gosling)**

- Sites suitable for development:  
166 Land east of A12 Yarmouth Road

#### **NorCas**

I would not like to see land developed north of the existing developments at Gunton & Corton. It would tend to become like ribbon development and would close the essential gap between Lowestoft & Gorleston.

### **167 - Land north of Church Lane, Lound**

#### **Mr A W Baker**

This is a lowland area which has been known to flood, especially the Blacksmiths Loke leading to the proposed site. As this is a rural area this makes an idea place for all kinds of wildlife i.e. bats, owls etc. Also it is sometimes used by walkers. Have any thought about entry and exit to the above it would be possible on Blacksmiths Loke it is too narrow as houses are already there.

I assume the other entry and exit would be Church Lane which has a large amount of traffic and the road system will have to be improved for safety etc. A major point with all these houses there will of course be more children and the schools in the area are already overflowing 'where will they go' due to the growing population new houses have to be built, but not to the proposed scale at Lound, as it is a small village and would be out of proportion.

#### **Hilary Baker**

This site is totally unsuitable for a housing development of the size suggested. Another 138 houses would almost double the size of Lound, and completely change the character of the village. There are no jobs or schools in the village, so there would be a big increase in car journeys. Church Lane is narrow, and could not take the extra traffic, so new access roads would be needed. The site is currently open agricultural land which is a major contribution to the attractive landscape around the village. A well used footpath (part of The Waveney Way) crosses this site. New infrastructure such as roads and drainage would be needed before a housing development of this size could be contemplated.

#### **Susan Burden**

I do not think the plans to put 138 houses on the site at the end of Blacksmith's Loke is a very good idea.

The infrastructure of the village could not sustain it. We on this part of Blacksmiths Loke are on soakaway sewage the pipe of which is under this field so it would mean a complete reconstruction of the sewage system.

The village itself has no shops, no school. Very limited transport. The only entrance to this field is down Blacksmith Loke which is an unadopted Bridal Way and there is a public footpath across the field itself and is



all part of the Waveney Way. There is no drainage system in Blacksmiths Loke and it floods badly after any rain. So concreting over the field would make this situation even worse. As the water would all run down the Loke as happened after housing was built on the land opposite the Village Maid. The water all runs down here now as it has nowhere else to go.

**Moira Cargill**

I feel that this is a completely inappropriate site for development , Lound is a rural , traditional English village that will be ruined by such a large development. The village will double in size , the sewerage system would require a massive upgrade, causing huge disruption to all who live in the village and surrounding areas. The people who live here enjoy the space and agricultural scenery , we have chosen to live here and feel that such developments are for less rural areas.

**Moira Cargill**

We feel that such a large development without giving consideration to the existing size / population of Lound is completely inappropriate, the existing sewerage / drainage system would require huge renovation leading to disruption and chaos for those already living in Lound and the surrounding areas. The population of the village would increase drastically. The roads are already in a poor state of repair and are not and are not wide enough to accommodate extra vehicles daily. Those choosing to live in the relative peace and quiet of a small village and the surrounding areas will find such a large development very difficult to adjust to. The two local primary schools would require to expand to accommodate extra pupils, Blundeston will already have to accommodate families from the prison site development. We are opposed to the development 167.

**Ms Francis Harvey and Mr Paul Church**

Site 167 is certainly unsuitable for 138 houses. That land is a haven for wildlife and has a well used footpath running across it. It has been used as a pasture land for years and building on it would be an absolute eyesore for the people living in Blacksmith's Loke and for the countryside around Lound.

**Mr R Lubbock & Mrs J Cockram**

We like the village as it is. It is quiet and friendly and a great place to live. We have enough idiots who drive through at well above 30 and we also have enough residents that need to park on the road making speeding cars cause a problem for people.

To build the proposed amount on both sites will only increase this problem as the infrastructure will not be able to support another 200 plus regular vehicles. We will lose the fragile tranquillity we have at present. We agree housing is needed, but this amount will cause problems on our very country roads.

**Paul & Christine Colby**

Lound has been our home for many years, one of the main reasons we chose to and love living here is because it is unspoilt by modern development and has a close-knit, friendly community, all of which will be destroyed by this proposed mass development.

For this reason and more besides, we strongly object to this proposed development. This would bring between 300/500 extra people to our village, the roads and local amenities would not be capable of coping with this!



**Rita Flatt**

The larger area has only just come into the picture I believe, and has been submitted by the owners, Suffolk County Council.

This is a green area.

This has a well-used footpath running across it, part of the much publicised Waveney Way.

This is a haven for wildlife, as it remains pasture from year to year, and a great pleasure to see the owls tracking back and forth for food.

This would be a visual disaster for Blacksmith's Loke dwellers.

Some 120 houses would just about match the existing number of houses in the village (excluding the larger, out of village dwellings).

Is this to divert our attention from possible plans to be put forward for new use of the old Lothingland School?

The four villages nudging the Norfolk County border i.e. Ashby, Herringfleet, Somerleyton, Lound should, in my opinion, remain as unspoilt villages without any large developments. They are visually attractive and should remain so, for present and future generations, not only for the dwellers themselves but for those who travel to visit the area for recreation. If they were to be developed where would the facilities needed (doctor, shop, transport come from? And that's without the consideration of the basic needs of electricity, water sewerage). Is putting new housing in a country area, knowing that any transport for jobs/shopping would have to be by car, causing extra vehicular chaos and pollution a way forward for the future?

**Mr and Miss Bower and Gallagher**

Way too many houses for a small village like Lound. There is ample traffic already on small roads. Lound is a nice unspoilt village which is big enough and does not require housing developments. People who live and move to Lound do so because they like it as it is and will not be grateful of the site 167 proposal.

**Mr Gallop**

This site is wholly inappropriate for development on such a scale. An application on an adjacent site ten years ago plus by another party was rejected for only 3 bungalows (and lost on appeal) quite rightly due to amongst other things surface drainage and increase run off flood risk. Now someone is suggesting 130 or more houses is quite astonishing in an area rich with wildlife, ie deer, barn owl to name but two and on fundamentally the same land and same issues. Tarmac over the fields why not, street lighting everywhere. This is a rural area and should be protected not urban sprawl as Bradwell and Belton or Caister and Ormesby has become.

There is totally inadequate infrastructure to support such a huge, by scale, development which would be a genuine blot on the rural landscape for Lound village. Indeed it would change the whole characteristic of the immediate rural area which is renowned for walkers, horse riders, country pursuits, and quiet enjoyment generally of the residents and visitors alike. It would certainly risk to blight the value of some of the existing properties adjacent to the site in addition. Traffic "rat running" has already increased significantly with the consequential damage to verges, rubbish dumping etc thanks to navigation systems etc. The increase in internal local traffic alone would simply become intolerable and destroy the community as we know and love - no more a quiet visit to enjoy the ducks on the mardle that families and children love to see.

This isn't Blundeston, Bradwell or Corton. There are no immediate local jobs or prospects of same or schools to cater for such numbers. It will just create more local traffic on inadequate rural roads not intended or fit for



the purpose. Throwing up blocks of housing on any old bit of land that shows up is not a solution to a wider housing issue generally spoiling the enjoyment of the many for a very few.

### **Lily Gosling**

I don't agree that Lound would benefit from more houses being built, this is a small village and should stay so, as a resident of Lound since 1958 I feel the quality of life of the people that live in Lound at this time would suffer. The houses are not needed, but the need for a quiet place to escape to is hard to find and many visitors come to Lound to enjoy the freedom that Lound can extend them. Any expansion would spoil this quiet lovely unspoilt village.

### **Audrey Grapes**

I first moved to Lound in 1988, attracted by its idyllic appearance – country pub, post office, village shop. Over time the street in Lound has become a short-cut for traffic from A143 – Bradwell / Gorleston to Oulton Broad / Lowestoft, and because of the winding nature of the road, difficult to negotiate. In spite of 30 mph limit drivers constantly exceed this – often on mobile phones!

Lots of the existing properties are terraced and obviously do not have car spaces. Both the shop and Post Office are gone. The re-opened public house has generated more traffic, weekends as many as 12 cars parked alongside the pond, nose-to-tail, and in front of my property.

To introduce more houses, more cars with no amenities, bad drainage, access – particularly from proposed site 75 – seem most inappropriate. Changes in climate have seen Jay Lane / Church Lane, Lound Main Street and Blacksmith's Loke regularly turned into virtual rivers in the last two weeks alone. Drains have been overwhelmed.

I hope that instead of just looking at plans on paper in offices, your committee will hold more site meetings to fully investigate the for and against such plans that you have before you, not just 'rubber stamp' them through.

Bear in mind: lack of schools / no doctors surgery, no amenities, minimal public transport, lack of adequate drainage.

### **Jane Harrison**

I cannot believe this site has been put forward for a suggested 138 houses. My main concerns are traffic issues, I am assuming the only road exit possibilities from this site would be via Blacksmiths Loke or onto Church Lane. Neither of these roads would be able to cope with the amount of through traffic generated by the potential of over 200 vehicles from the proposed development.

If the traffic were to exit into the Village, The Street would become a major thoroughfare. It is already a very busy and dangerous road, with carparking on both sides of the road, housing on both sides, a busy cafe and popular pub. Traffic is currently a problem at peak times, I can't imagine how unpleasant it would become with all the potential influx of vehicles.

If the traffic were to exit onto Church Lane, again I can envisage major issues.

Firstly as above the traffic could still potentially pass through the village.



Secondly, potentially all traffic would exit very close to the church and Village Hall, at times traffic entering and leaving these areas can be busy, and it is a blind corner as you come round from the Church towards the A12.

Thirdly, Church Lane and Jay Lane already have a tendency to flood on a regular basis as soon as there is any significant rain fall, the building of houses on this land, could increase the level of flooding on the road, as drainage land will be lost, also traffic along this road heading to the A12 would be dramatically increased making it more difficult to negotiate the flooded areas.

Fourthly, the traffic from this site would be directed to the A12, this is a difficult dangerous junction, coming and going to and from Jay Lane, the increase in traffic volume at peak times, would increase the risk of road accidents at this junction.

Other concerns, are lack of school places in the area, overcrowding of the village, village ethos would be lost, potential for extension to churchyard would be lost, and important British wildlife lost from the area.

As a resident in an already busy village, I feel totally opposed to this site being used for housing.

#### **MR and Mrs RA and BC James**

This area is owned by Suffolk County Council and should not put good agricultural land up for building. The infrastructure needed e.g. sewage, power and water is a major concern. There is no mains gas in Lound village.

The burial grounds around St. John the Baptist Church will become insufficient in the future.

#### **Bruce James**

I have enjoyed life at Lound for many years. I consider this area as my heritage and find worrying the proposals here by the New Waveney Local Plan.

At present the village area has about 70-80 dwellings on 9 acres of land. The proposed site 167 would use a further 17 acres of "prime agricultural" land to provide a further 138 dwellings.

Such a large development would effectively triple the amount we have now and I fear would prove the present infrastructure unable to cope.

Jay Lane and Church Lane, the main route into our village, are in a disgusting state of repair with pothole and flooding problems and should not be subjected to further traffic without substantial repairs.

Lound sewage struggles to pump 1 1/4 miles from Back Lane to Hopton on Sea thus burdening their capacity in Norfolk.

Until now Lound has managed to remain a neatly compact village but if such a large development is allowed, sprawling eastward into open countryside the village's present charm and character would be lost forever.

The large site 167 extends onto low damp ground and thus is not ideal for building. There are drainage ditches along its northern and western sides which are essentially maintained to prevent the even lower Blacksmith's Loke area from storm flood.

The smaller proposed site 75 is also low wet ground. I can remember a pond there next to the road, development here would likely create further drainage problems.

My steadfast belief is that prime agricultural land should be preserved to feed an ever increasing population whilst the poorer and brownfield used for housing.



I say both proposed sites 75 and 167 are therefore unsuitable for housing development.

**Harry Jarvis**

The two areas proposed for housing sites 75 and 167 are prone to flooding especially the areas around Blacksmiths Loke as these are the lowest points in the village. The land in this area is very close to the water table hence the pond ('mardle') which is fed from an underground spring.

**Jacob Kent**

Over doubling the size of our village can never be a good idea. The location will only make Jay Lane more dangerous with increased traffic pulling out onto an already busy road. I feel the size of the development will also cause animosity between people on the new estate and existing residents forming old / new Lound rather than one community which we have now. Also that amount of people will make our small village even busier, congestion, parking, public transport are already a problem. Water, schools and the Paget are also concerns that I have.

**Kay Ling**

I believe this development of 138 houses is far too big for Lound, Lound only has 150 houses at the moment, Lound is used as a tranquil / away from it all village used by many people outside of the village to hike, walk dogs, birdwatch, horse ride, and visit for the peace and quiet, children can come and feed the ducks on the local village pond and enjoy a safe romp across those fields via the footpath (The Waveney Way) without any harm away from traffic. I believe the structure of the village will suffer from more houses being built and Lound will lose its elite Ness as a haven for everyone to enjoy.

**Jon Lovelock**

We are currently in the process of buying a property in Lound and are actually having second thoughts regarding carrying on with this due to the plans to build all these houses. We are buying in this village because it is just that, a small village. With these houses it will be doubling the size of Lound. We also would like to keep the natural beauty of the area for walks and bird watching, this amount of houses will have a drastic effect on this. Also the area would not have the amenities to withstand that many houses, there is no school or even a shop. The road network is not able to cope with this and also the volume of cars that will come with these houses will mean that the roads will become more dangerous as there are hardly any footpaths in the town. With the pub reopening it has reduced the street to single cars being able to get through. Blundeston is becoming over populated and sooner rather than later the two villages will become one and the small, quaint village life will be lost forever.

**Brian and Patricia Mitchell**

The good things about living in Lound is the peace and tranquillity of an unspoilt Suffolk village, there are very few of these quaint little villages left, this is the reason we choose to retire here 16 years ago its outrageous to even think our little village could take 213 houses with the sewerage system and extra traffic, we have no facilities the school has been shut and also our post office / shop.

**Kevin Morgan**



As already mentioned Lound is a small village which is part of the attraction for most who live here. I also suspect this is not the first time that property developers have tried to build in or around the village.

I would say the infrastructure of the village would not withstand the development of this kind, we have major flooding on certain roads / land around the village every year without fail.

The sewage system seems to also flood at times in Back Lane possibly overloaded? So I suspect this would not be able to sustain further development.

The village is surrounded by open countryside and employment mainly comes from agricultural or horticultural sector, so employment I would say will be very limited in this area.

So with next to nil opportunities for employment / no schools & facilities, any occupiers of any new homes would need to commute in order to find work etc. This would therefore increase the traffic flow on rural roads and lanes that surround the village by a considerable amount, they are barely adequate at peak times at present.

Further to the traffic issues I suspect any development on both sites will cause traffic problems for residents both entering and exiting the village during building so again increased traffic and disruption will be caused which is unacceptable to residents of the village.

It's difficult to see what positive effect such development proposals will have on the village. The feeling is that it will destroy rural nature of the village and the surrounding countryside and increased noise pollution and turn the village into an estate.

This development will not enhance the village in anyway the only enhancement will be to the developers bank account as they try to squeeze another few rabbit hutches on a plot of land while destroying another English village in the process.

#### **Robert Moyse**

I feel that if this planned development went ahead it would totally destroy what is and hopefully always will remain a very quaint and picturesque village. The above named site is directly behind my property and if the proposed houses were to be built it would destroy everything that I have enjoyed since moving to the village , the views I have from my Windows would be gone and replaced with a concrete jungle ! the wild life that i like to watch would be gone ! the peace and quite of being in a rural location would be gone !

The roads around the village could not cope with the extra traffic this would create , the drainage is very poor in village and adding more property's would only enhance this issue. There are already issues with localised flooding after heavy down poors , so if this proposed site goes ahead this would only get worse as there would be nowhere for the additional water to go if all these houses, driveways and roads where built.

#### **Anna Moyse**

I do not feel that site 167 is suitable for the proposed 138 houses. I feel there are numerous reasons for this. 138 houses would almost double the size of the village of Lound. I do not feel it would be in keeping with the village as it is, Lound is a lovely small picturesque village that people like to come and visit and walk around.

The existing infastructure would certainly not cope. The drains/sewerage would not be able to cope as it struggles as it is at present. There are many areas that flood when there is a heavy downpour of rain. This problem would be made so much worse if this proposal went ahead. The roads around the site are busy and narrow, more homes would make it even more hazardous. 138 houses means alot more than 138 cars. New roads would have to be built in order to reach the site as i belive the only access at present is through the farm. The school in the village has been closed so where would the families send their children? Also there are



no street lights in the village, surely a new development would include street lighting, leading to light pollution.

This site is directly behind my home. We have already had subsidence caused by trees belonging to Suffolk County Council which were not maintained by them. 138 houses would cause so many problems as I believe the area is very heavy clay. The ground is damp and boggy on a lot of this site. It also has a public footpath running through it which I believe to be part of the Waveney Way Walk. This walk is used by many people all year round. There is also a lot of wildlife on this site, every morning and evening I see the Barn Owls hunting for their food.

On a more selfish note we bought our property due to the wonderful location, the peace and quiet and the unspoilt nature of the area many years ago. We look out onto a farm at present, I would not be wanting to look out of my windows onto a housing development or sitting in my garden being overlooked by houses! I understand that development might be needed in the area but I for one feel that it needs to be 'infill' development and certainly needs to be in keeping with the village as it is, it needs to be done sympathetically and not on the scale proposed.

#### **Jennifer Ozinel**

I don't think this site is suitable for development. Lound is a small close-knit community. There is a good community spirit and neighbours rally round when help is needed. People come here for the peace and tranquility and to get away from the noise and bustle of town. I am worried that village life would be lost forever. This site is crossed by a footpath which is used by many people. Walkers come especially to use this footpath from many different areas. The village roads are narrow, and would not cope with the extra traffic from a large housing estate. There are no schools, work, or shops in the village, and the bus service is infrequent, so a development here would mean many additional car journeys, adding to pollution.

#### **moiraselvage**

This unique and picturesque village of Lound with a round tower church and mardle, would not be suitable for a site building 148 houses, or indeed for the plot for 14 houses.

The site by the Village Maid would not only destroy the tranquil beauty of the village, but be a most inappropriate site along the main street with its traffic possibly causing congestion and danger.

The aesthetic value of Lound's pastoral views and the enjoyment it affords villagers and the many visitors will be an enormous loss. The country walks, appreciation of flora and fauna, doggie walking, horse riding, bird watching will indeed affect the uniqueness of this historic village if building on such a gigantic scale is allowed.

Lound could possibly sustain the building of a house here or there, but THINK AGAIN in 20/30 years time what it might be like with concrete jungle tearing apart a jewel of a village.

Preservation not destruction should be the right route to contemplate.

#### **Louis Smith**

This potential site is completely inappropriate for development. A development of this size would double the size of Lound, and completely overwhelm the existing community. It would change the character of the



village. Surface water drains from West to East across this land, and any development here would disturb this flow and could result in flooding to existing properties in the village. The foul water drainage is already at full capacity, so significant investment in drainage would be required. Church Lane is a narrow lane which would not handle the extra traffic generated by a large new housing estate. Lound has no shops, schools, or employment and a very limited bus service, so new houses would mean many new car journeys. This area is also frequented by bats and barn owls which use the farmland as feeding areas. Finally a development which encircles the churchyard will prevent any future expansion of the churchyard - it is already nearly full.

#### **smith**

we wish to complain about the proposed application 1 the road and infra structure will not take any more use 2 we are constanly flooded 3 the traffic systym will not cope 3 the wildlife habitats and feeding aeras will be destroyed 4 the peacefull village will be destroyed 5 the acess to the site will create further hazards on the roads we fell that any more housing must be on a minor scale any building on the proposed site these houses will be higher than than most espescially in blacksmiths loke this would mean more flooding and sewage problems the site has a footpath that runs through it the water pressure is low and the supply is not very good at times ther is no parking only on the roads there is no street lighting there is no school in the aerea no shop only a pub and a café we fell that a devolpment of this size will only destroy this aerea mr g smith

#### **Miles Thomas**

A development of this size and nature would double the size of a very small village changing its nature considerably. There is little infrastructure to support this development as the roads around are small and would not cope with increased traffic. It is also close to a nature reserve, Lound Waterworks, and would impinge on the delicate balance of nature present. It would be better to site this development nearer better infrastructure such as a larger village or town.

#### **Mr & Mrs Tooke**

The village should remain a village and not double or more in size. The green field sites should remain green field and provide soak aware areas not used for housing.

Housing will cause light pollution with street lighting. The amount of traffic during and after building will increase considerable causing an increase in air pollution, there is plenty of traffic already. Wildlife will suffer which includes bats as well as owls, ducks and cuckoos and many other species of birds. The only work in the area is agriculture and existing public house and café. Empty shops and brown field sites should be used for new housing.

#### **Mr A Woods**

It's a pity because I love living in Lound and we know there is need for more houses. But 600 more people to come here no more village. Is this also to do with work in north sea. I hope there are less houses built. But I think it is to do with money like always.

#### **Historic England (Debbie Mack)**



Adjacent to Grade II\* Church of St John and proximity to Mardle House grade II listed building. Potential impact upon setting of high grade Listed building and other listed building.

### **Lound Parish Council (John Burford)**

Lound Parish Council had an extraordinary Parish Council meeting on 3rd May to discuss our reaction to the Waveney Local Plan consultation. This was attended by Parish Councillors and 30 members of the public, a very large turnout for our small village.

Everyone at the meeting was horrified by the two potential development sites which were put forward (site numbers 75 and 167), and the number of houses being suggested which would double the size of the village.

A lengthy and fruitful discussion took place where the members of the public freely shared their views. There was wholesale opposition to any large housing development in the village. Everyone agreed that any development in the village should be small in scale and within the existing character and built area of the village. The pertinent points of opposition in relation to the suggested development sites were :

- Inappropriate size
- Change the nature of the village
- The need to preserve nature and the environment
- Take away the possibility of church yard extension
- Owl and Bat habitat, both of which are protected species
- Flooding will occur to existing properties if building takes place on what is 'a flood plain.'

### **n/a (Judith Hobbs)**

Any development must be proportionate. 138 houses would more than double the size of this village, which would be swamped by it. Lound's 'small village' character would be changed for ever.

Lound is a 'green lung'/buffer between ever encroaching growth of Bradwell & Blundeston. It is a quiet, sleepy place with open skies, open space and wide vistas. Many visitors come to walk cycle & ride horses round its lanes and fields, and benefit from the peacefulness relaxation & leisure it affords. Lound is still small enough to be a community where people know & look out for each other. Lound would lose all this if a large development were imposed upon it. There is nothing here to sustain a big increase in residents; everything is a car-drive away; there is only a minimal bus service. We like it that way, and we certainly would not want street-lighting.

Moreover, this is a greenfield site & a serious wildlife habitat, with barn- & tawny owls, skylarks nesting, bats, weasels, voles, butterflies, moths and much else. It is crossed by a public footpath which is part of the Weaver's Way. Priority must be given to brownfield sites before any greenfield land is ruined.

A large development would require major new infrastructure, especially drainage, both surface water and sewerage. There have been recurrent problems with both for years. Sewerage often backs up in at the western end of the site and has to be pumped out. Also the western end is within the catchment of The Mardle (the village pond), is boggy and often under water. The adjacent land to the west (The Green) was built on in the early 1990s; this was previously marshy and acted as a mini flood plain for The Mardle. Now the water cannot escape and property at the western end Blacksmith's Loke is regularly flooded. The 'locals', who actually knew what they were talking about, warned the planning authority at the time that this would happen, but nobody would listen. If this field is built on the problems will only get worse.

Finally the issue of safety; 138 new houses means a couple of hundred additional cars, plus delivery vans and other vehicles having to negotiate narrow lanes, mostly without footpaths. There is already a problem of speeding through the village, & the added dangers, traffic noise and pollution would be simply unacceptable. Further, Church Lane/ Jay Lane, which is narrow, poorly surfaced & prone to flooding, & the



junction with the A12, already dangerous because of poor sight lines, short slip lanes and atrocious road surface, simply could not cope with the additional traffic - accidents waiting to happen.

An additional point

The churchyard is almost full and may soon have to be closed to burials. Local people clearly wish to be buried here if possible. If the churchyard were closed the Local Authority would have to bear the burden of burials in the public cemeteries. It therefore makes sense that any development proposals should consider the opportunity to allocate land for an extension to the north side of the churchyard, which it abuts.

**n/a (Alan Yardy)**

1. Any development which affects the medieval setting of this much admired church should be opposed.
2. Further traffic and access roads at this area of Church Lane would be very detrimental to all road users.
3. Additional traffic in Lound Street should be avoided.

**None (David Holmes)**

My property is adjoining this site, I am against this development for the following reason:

- 1 It is far too large and would completely transform the village
- 2 it is a rural site and has poor transport and road links which regularly flood
- 3 There is already a lack of local jobs and high unemployment
- 4 There are a number of brown field sites locally in Lowestoft which are undeveloped
- 5 When we approached WDC and SCC for planning permission for an extension we were refused as you stated that this would not fit in with the rural aspect of the area, that the area was unsustainable for development and that access to Church Lane would not be granted as it would increase the risk to traffic-. This development is much larger but seems to fly in the face of previous advice and policy

I am not against sympathetic and small scale development but this has been previously rejected by WDC and feel this is a massive development compared to the size of the village and completely against previous policy

David & Alison Holmes

**168 - Land south of Union Lane, Oulton**

**Environment Agency (-)**

We have done a high level review of the proposed sites and identified the following environmental constraints:

Source Protection Zone 3

\*Source Protection Zone - These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).



<http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

**Historic England (Debbie Mack)**

Proximity to Blue Boar Inn, grade II to the east and the Manor House grade II \* listed to the south east.  
Potential impact upon the setting of high grade and other listed buildings.

**Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:  
168 Land South of Union Lane  
We do not consider this site suitable for development due to poor access and egress road infrastructure.

**169 - Land south of Union Lane and west of Red House Close, Oulton**

**Gary Shilling**

Not suitable as village infrastructure not capable of sustain a development of this size, I.e drainage (already an unsolved problem), roads ( too narrow and un paved for pedestrians), Lowestoft swallowing up surrounding villages again.

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We do not consider this site suitable for development due to poor access and egress road infrastructure.

**170 - Land south west of Union Lane, Oulton**



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**Historic England (Debbie Mack)**

Proximity of ruins of Church of St Andrew grade II to the north west. Potential impact upon the setting of Listed building.

**Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:

170 Land South West of Union Lane

We do not consider this site suitable for development due to poor access and egress road infrastructure.

**171 - Land west of Flixton View, Oulton**

**Craig Hamilton**

I have 2 concerns associated with the proposed development. Firstly, for the number of homes being suggested I would have concern about traffic infrastructure either from Union Lane or via Hall Lane due to the significant increase in traffic. Secondly, other than the proposed dwellings adjacent, the dwellings suggested on the farmland towards Flixton, my understanding is that this would be to the detriment as it expands onto existing farmland, and surely using a brownfield site would have a better impact. This of course applies to 169, 170 and 171.

**Historic England (Debbie Mack)**



Proximity of ruins of Church of St Andrew grade II to the west. Potential impact upon the setting of Listed building.

**Oulton Parish Council (Carolyn Gosling)**

- Sites not suitable for development:  
171 Land West of Flixton View

We do not consider this site suitable for development due to poor access and egress road infrastructure.

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**172 - Land to west of Parkhill (south of Spinney Farm), Flixton (East)**

**Historic England (Debbie Mack)**

Proximity of The Lodge and The Hall, both grade II listed to the east. Potential impact upon the setting of Listed buildings.